

City of Evansville Department of Metropolitan Development (DMD)

# **EMERGENCY SOLUTIONS GRANT**

## **AWARD MANUAL Part I 2024**

**Administration  
Shelters  
Street Outreach**

First Issued July 17, 2017

# **ESG SHELTER AWARD MANUAL**

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## **Chapter 1**

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### **EMERGENCY SOLUTIONS GRANT OVERVIEW AND PROGRAM OBJECTIVES**

#### **Emergency Solutions Grant (ESG) funds are administered locally by the City of Evansville Department of Metropolitan Development (DMD)**

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), enacted into law on May 20, 2009, consolidated three of the separate Homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revised the Emergency Shelter Grant program and renamed it as the Emergency Solutions Grant (ESG). The new ESG grant focuses on assisting people quickly to regain stability in permanent housing after experiencing a housing crisis and/or Homelessness.

DMD officially collaborates with the Continuum of Care (CoC) for their region. The City of Evansville is part of the Indiana Balance of State CoC. The Indiana Planning Council on the Homeless is the governing body for the Indiana Balance of State CoC. On February 12, 2012 the City of Evansville made an official declaration of collaboration with the Indiana Balance of State CoC.

The Indiana Balance of State CoC is divided into regions, and the City of Evansville is part of Region 12. The Homeless Services Council of Southwest Indiana (HSC) serves officially as the Region 12 Planning Council. On December 14, 2012, the Region 12 Region Planning Council Charter was adopted. The following performance goals were adopted:

- 1) Decrease shelter stays by increasing rapid re-housing to stable housing.
- 2) Reduce recidivism of households experiencing homelessness.
- 3) Decrease the number of Veterans experiencing homelessness.
- 4) Decrease the number of persons experiencing Chronic Homelessness.
- 5) Decrease the number of households with children.
- 6) Increase the percentage of participants in CoC funded projects that are employed at exit to 38 percent or higher.
- 7) Increase persons experiencing homelessness's access to mainstream resources.
- 8) Collaborate with local education agencies to assist in the identification of homeless families and inform them of their eligibility for McKinney-Vento education services.
- 9) Improve homeless outreach and triage to housing and services.
- 10) Improve HMIS data quality and coverage, and use data to develop strategies and policies to end homelessness.
- 11) Develop effective discharge plans and programs for individual leaving State Operated Facilities at risk of homelessness.

Some Highlights of Requirements and Priorities for City of Evansville ESG funds:

- The new ESG places an emphasis on communities working together as a system with coordinated entry system.

- ESG subrecipients are expected to participate in coordinated entry with other ESG sub recipients within the homeless system.
- ESG subrecipients are expected to allow referrals using a common assessment in coordinated entry.
- ESG subrecipients are expected to work with other ESG subrecipients on community solutions to ending Homelessness and triage for clients that fall in-between gaps.
- ESG subrecipients are expected to attend at least 75% of Homeless Services Council of Southwest Indiana monthly meetings.
- ESG subrecipients are expected to coordinate ESG funds between the DMD and Indiana Housing Community Development Authority (IHCDA) if receiving ESG funds from both sources.
- ESG subrecipients are expected to keep data up to date in HMIS at least on a monthly basis.
- ESG subrecipients are expected to allow a Regional Data Administrator to gather aggregate data from HMIS (keeping personal information confidential).
- A fairly new HUD rule, Equal Access to Housing, does not allow discrimination against couples including unmarried, and the lesbian, gay, bisexual, or transgender (LGBT) community.
- HUD does not allow discrimination against children based on age and gender.
- Monitoring of ESG subrecipients will be done through the Standards of Care committee process.
- HUD will not allow new transitional housing applications, only those that previously received ESG funds for transitional housing are allowed to apply for ESG funds.
- Couples have been identified as a gap in our local current Homeless system. Most couples are split apart based on gender, but there are times when a couple needs to stay together due to disabilities or other pressing priorities.

In addition, all City of Evansville ESG subrecipients are expected to adhere to this manual.

#### ESG Components & Eligible Activities

1. Street Outreach
  - A. Available to serve unsheltered homeless persons
  - B. Can be used for essential services that include:
    1. Engagement
    2. Case Management
    3. Emergency health and mental health services
    4. Transportation
    5. Services for special populations
2. Emergency Shelter
  - A. Available to serve homeless persons staying in emergency shelters
  - B. Can be used for essential services that include:
    1. Case Management
    2. Child Care, Education, Employment, Life Skills & Legal Services
    3. Outpatient health Services, Mental Health, Substance Abuse Treatment

- 4. Transportation
- 5. Services for special populations
- C. Can be used for the operations of a shelter
  - 1. Utilities
  - 2. Food
- 3. Homelessness Prevention
  - A. Available to serve persons below 30% AMI at immediate risk of becoming Homeless
  - B. Uses:
    - 1. Prevent an individual or family from becoming homeless (diversion).
    - 2. To help an individual or family renting regain stability in current housing or obtain permanent rental housing.
  - C. Can be used for housing relocation and stabilization services and short/medium term rental assistance.

The category of Homeless Prevention is also available in conjunction with a rapid re-housing program targeted at homeless clients that previously were eligible for rapid re-housing but lost eligibility status. These are very limited and require DMD approval.

- 4. Rapid Re-Housing
  - A. Available to serve persons who are below 30% AMI and are literally homeless
  - B. Can be used to help a Homeless individual or family move into permanent housing and achieve Housing
  - C. Can be used for housing relocation and stabilization services and short/medium term rental assistance
- 5. Administration - DMD does not keep administration for themselves, but allocates administration funds to one or more agencies up to 7.5% for coordinated entry administration at the city-wide level.

There is no cap on homeless prevention and rapid re-housing activities with ESG. Shelter and Street Outreach combined have a cap based on the amount of funds received by Emergency Shelter Grant in fiscal year 2010.

**Declaration of FY 2010 Grant Fund Commitments**

<b>Activity Type</b>	<b>Obligated Amount</b>
Homeless Assistance	\$ 129,964
Homelessness Prevention	\$0
Administrative Activities	\$0
<b>Total FY 2010 Award</b>	<b>\$129,964</b>

**City of Evansville**  
**Department of Metropolitan Development**

**Citizen Participation Plan for the Consolidated Planning Process**  
**Community Development Block Grant (CDBG)**  
**Emergency Solutions Grant (ESG)**  
**Home Investment Partnership Grant (HOME)**

**INTRODUCTION:**

The City of Evansville (City), as a recipient of CDBG/ESG/HOME funds is required to complete a Consolidated Housing and Community Development Plan. The primary purpose of the community development and planning programs covered by the Citizen Participation Plan is to develop healthy urban communities by providing decent housing and a suitable living environment, and expanding economic opportunities principally for low and moderate income people. The U.S. Department of Housing and Urban Development requires the City to submit a detailed citizen participation plan that provides and encourages the participation of persons of low and moderate income who are residents of the areas in which these funds are proposed to be used.

**I. PUBLIC NOTICE**

There shall be an advanced 10-day public notice of the availability of required federal documents (e.g., the five-year Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports), and of all public hearings and meetings pertaining to the funds related to the Citizen Participation Plan.

The City of Evansville will continue to identify communication resources, to insure accessibility for all persons, regardless of their disability, language, or nationality to information provided by the City. The City has identified nine (9) known resources of communication that will be utilized by the City/DMD in providing notification to the public.

All public notices will be sent by email to the following organizations requesting the distribution of information. The Evansville Courier & Press and Our Times Newspaper will publish legal ads as requested.

1. **The Evansville Courier & Press** – local newspaper
2. Minority outreach newspapers and/or other media resources
  - a. **Our Times Newspaper**
  - b. **HOLA Newsletter**
  - c. **El Informador Latino**
3. **WNIN** – A local media agency that provides Public Service Announcements(PSA) in English and Spanish
4. **The Evansville Blind Association** – read PSAs to visually impaired
5. **City of Evansville** – post public notifications on City of Evansville website: Evansville.in.gov where links to plans and reports are made available for

review and comments.

6. **United Neighborhoods of Evansville (UNOE)**
7. **The Evansville Housing Authority**
8. **Indiana Balance of State - CoC**
9. **Evansville Vanderburgh Public Library**

The advertisements announce the amount of federal funds available, the projected community development and housing activities to be undertaken, and the expected/actual population being served. Current operating agencies, and organizations on a contact mailing list receive emails regarding the public meetings. The DMD maintains an interested parties list of organizations or persons requesting notification of updated plans and public meetings.

Chapter 2.200 of the Evansville Municipal Code established an ordinance requiring online audio and video archived recordings of public meetings of government or advisory bodies. It is the intent to achieve greater transparency of local government by requiring the archiving of audio and video recordings of public meetings or local governing or advisory bodies via the Internet (Ord G-2014-35, passed 12-19-14). Most public meetings are conducted in the City-County Building, 1 NW Martin Luther King Jr. Blvd., Evansville, IN, either in conference room 307 or 301, where internet recording is available. Meetings and hearings are held at such locations that are accessible to the disabled and centrally located to the Focus areas. The City of Evansville will take whatever action is appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. The jurisdiction will take all due efforts to improve the public notification of events.

Any form of public notice will instruct entities interested in applying for these funds to contact the DMD and shall contain the following language, "The Department of Metropolitan Development does not discriminate on the basis of race, color, religion, national origin, age, gender or disability. If a reasonable accommodation such as a sign language interpreter is needed, please contact the Department at (812) 436-7823 (voice) or (812) 436-4928 (TDD) at least three (3) business days before the meeting."

## **II. PUBLIC HEARINGS AND MEETINGS**

- A. Needs Hearings: At least two public meetings are held each year to assess community needs and establish funding priorities in order to update the City of Evansville's Consolidated Plan. Public notices are posted in local newspapers and other media resources **30-days prior** to the required submission of plans/reports to HUD. The public is encouraged to submit comments in writing to DMD or attend the Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) meetings.
- B. Consolidated Plan: The Consolidated Plan Draft is made available on the City of Evansville website, [www.evansville.in.gov](http://www.evansville.in.gov) and in the DMD office for not less than 30 days prior to submission to HUD. Several public meetings are conducted in the focus area for citizens' review of the plan. All written comments are accepted up to four (4) days prior to submission of the Consolidated Plan. A summary of all

comments are forwarded to the City Council and the Mayor as well as becoming part of the final Consolidated Plan.

- C. Annual Action Plan: The Annual Action Plan Draft is made available on the City of Evansville website, [www.evansville.in.gov](http://www.evansville.in.gov) and in the DMD office for not less than 30 days prior to submission to HUD. One public meeting is conducted in the City-County Building for citizens' review of the plan. All written comments are accepted up to four (4) days prior to submission of the Action Plan. A summary of all comments are forwarded to the City Council and the Mayor as well as becoming part of the final Annual Action Plan.
  
- D. Consolidated Annual Performance Evaluation Report (CAPER): is made available online on the City of Evansville website, [www.evansville.in.gov](http://www.evansville.in.gov) and in the DMD office. A summary of the CAPER will be made available to the public for review and comment not less than 30 days prior to submission to HUD. One public meeting is conducted in the City-County Building for citizens' review of the CAPER. All written comments are accepted up to four (4) days prior to submission of the CAPER. A summary of all comments are forwarded to the City Council and the Mayor as well as becoming part of the final CAPER.
  
- E. Substantial Amendments: A substantial amendment is defined as: the addition or deletion of an activity; or, a change in the location, scope, or beneficiary of an activity; or, an increase or decrease in program funds of at least 20% for any activity whose total allocation is \$100,000 or more. The Substantial Amendment is made available online on the City of Evansville website, [www.evansville.in.gov](http://www.evansville.in.gov) and in the DMD office. A summary of the Substantial Amendment will be made available to the public for review and comment not less then 30 days prior to enacting the changes.

There shall be public notice given of any substantial amendment to the Consolidated Plan and a **thirty (30) day period** for the public to review and comment either orally or in writing. Comments will be considered and responded to in writing by the DMD.

### III. CITIZEN COMMENTS/COMPLAINTS

Individuals, organizations, or neighborhood groups that have questions, comments or complaints pertaining to the Consolidated Plan, CDBG, ESG, HOME programs or proposals are encouraged to contact DMD for clarification, explanation, and/or assistance. All information and records relating to the federal funding process are open to the public for review. All inquiries should be directed to:

Department of Metropolitan Development  
306 Civic Center Complex  
One N. W. Martin Luther King, Jr. Blvd.  
Evansville, Indiana 47708  
Phone: (812) 436-7823  
Fax: (812)436-7809



DMD will provide timely, substantive written response to all citizen complaints.

#### **IV. TECHNICAL ASSISTANCE**

DMD staff will work with an organization to develop an effective proposal. DMD staff is available to answer questions and explain eligibility and benefit requirements to potential applicants. All applicants are required to contact DMD and have their completed proposal forms reviewed for correctness and completeness prior to the submission deadline.

#### **V. CITIZEN ADVISORY COMMITTEE**

The CAC is a seven (7) member body appointed by the Mayor to represent Evansville residents, especially the low-income community, in the allocation of funds process. Appointees represent housing, economic development and community development interests and are chosen on the basis of their personal knowledge about Evansville and the needs of the low-income community. All CAC meetings are open to the public.

CAC meet three (3) times during the grant review process; (1). CAC training and grant overview; CAC members receive a binder from DMD with ESG and Public Service CDBG grant proposals for evaluation and funding recommendations. Additional documentation includes: current HUD income guidelines, Needs Survey Results from Consolidated Plan, Low-Income Census Tract Map, and Grant requirements. (2). Agency presentations to CAC; opportunity for CAC to ask questions of agencies, and (3). CAC final recommendation; the seven member group recommends funding to the agencies and forwards to the Mayor.

Meetings are conducted in the City-County Building where the meetings are streamed Live online and recorded and archived for public comment.

#### **VI. CONSOLIDATED PLANNING PROCESS**

DMD will prepare a written description of all proposed uses of CDBG, HOME and ESG funds detailing all allocations, including proposed allocations to city agencies, in a summary (spreadsheet). Such description should provide sufficient detail to allow citizens to determine the degree to which they might be affected. At a minimum, this description shall include type of activity, location, and amount of federal money requested. This description along with a copy of each ESG and CDBG-Public Service proposals, will be distributed to CAC members and shall be made available to the general public for review **fourteen (14) days** before the CAC makes its recommendations to the Mayor. The summary spreadsheet containing these descriptions shall be provided upon request at no charge.

The CAC shall make recommendations to the Mayor on how to allocate CDBG Public-Service and ESG funds.

After review, the Mayor shall make funding recommendations to the City Council. The City Council, upon reviewing the recommendations of the Mayor, determines the projected expenditures for the proposed Annual Action Plan.

Availability of the proposed Annual Action Plan will be published as described in Section I **thirty (30) days** prior to final submission date.

After all comments have been reviewed, presented to the Mayor and City Council, and all changes made and ratified by the Mayor and City Council, the final Consolidated Plan shall be submitted to HUD forty-five (45) days prior to the end of the program year.

## **VII. ANTIDISPLACEMENT POLICY**

DMD shall follow its written Anti-Displacement and Relocation Policy and provide annual reports to HUD as part of the Consolidated Annual Evaluation Performance Report. The policy is kept on file at DMD and is in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

## **Chapter 2**

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### **PROGRAM REQUIREMENTS**

This section describes the basic program requirements and responsibilities under the ESG program. Subrecipients of ESG funding are responsible for demonstrating compliance with all of the program requirements and the ESG and HEARTH Regulations at 24 CFR Parts 91 and 576.

Program requirements include:

#### **1) Written Policies and procedures**

Subrecipients are required to create and maintain written policies and procedures that details program and contract expectations for staff and volunteers. They should include ESG program specific rules and expectations as outlined in this manual.

#### **2) Keeping Accurate Financial and Service Delivery Records**

Maintaining accurate records is an important aspect of management of ESG projects. Measurement of project performance relies on the tracking of information about services and activities. Sufficient records must be established and maintained to enable the subrecipient to show that ESG requirements are being met. Therefore, it is important that accurate information and documentation regarding program activities and services provided with ESG funds is gathered and maintained. DMD requires consistent reporting on expenditure of funds, program activities and measurable outcomes. In order to report fully on program outcomes and activities, subrecipients should consistently gather demographic information on the population being served by the ESG program and consistently report the types of activities being provided to participants.

Subrecipients that utilize ESG funds under the Essential Service category for Case Management activities are required to enter all relevant client-level data including case notes into HMIS or DV Client Track (if it is a victim services provider) on a consistent basis.

ESG regulations require that records be maintained for a period of at least five years after the end of the grant term. Agencies must have in writing that records will be maintained for five years.

### 3) Documentation of Homelessness

ESG subrecipients are required to obtain and maintain adequate documentation of the evidence used by the subrecipient to establish and verify the homeless status of persons being served. Written, dated and signed documentation of homeless status must be maintained in each participant's file.

The order of preference for documentation to demonstrate homelessness status is as follows:

1. Third-party documentation (obtained from another service provider or Third-party who is aware of the households living situation.)
2. Intake worker observations
3. Self-declaration

When third-party or intake worker observation documentation is not obtainable subrecipient must provide a record of due-diligence and the steps that were taken in attempting to obtain that level of verification. Maintain the record of due-diligence with the self-declaration form in the participant file.

Lack of third-party documentation must not prevent the household from being immediately admitted to an emergency shelter, receiving street outreach services or receiving services provided by a victim service provider.

If the Head of Household is unable to provide a written self-declaration the subrecipient staff member is encouraged to write down the Head of Household's personal account and document it on the form.

The Participant Eligibility Worksheet (HUD Homeless Documentation form) was created for use as a guide for proper documentation of homelessness. It is not required that this specific form be used, however the form that the subrecipient uses must document from where the participant was referred, what third-party verification was obtained, when possible, and must include a space for client and subrecipient staff signatures. The Participant Eligibility Worksheet (HUD homeless documentation form) can be found on IHCDA's ESG Web site: <http://www.in.gov/myihcda/2450.htm>.

**HUD has clarified the definition of homeless and the ESG program recognizes the following characteristics as being eligible for participation in the ESG program:**

- A. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - 1. Has a primary nighttime residence that is a public or private place not meant for habitation;
  - 2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government program); or
  - 3. Is exiting an institution where (s) he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
  
- B. An individual or family who will imminently lose their primary nighttime residence, provided that:
  - 1. Residence will be lost within 14 days of the date of application for homeless assistance;
  - 2. No subsequent residence has been identified; and
  - 3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.
  
- C. Any individual or family who:
  - 1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that related to violence against the individual or family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - 2. Has no other residence; and
  - 3. Lacks the resources or support networks e.g., family, friends, faith-based or other social networks, to obtain other permanent housing

ESG Street Outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under 24 CFR 576.2 listed below.

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

#### **4) Termination of Participation and Grievance Procedure**

It is important that subrecipients effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time.

- A. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- B. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
  - 1. Written notice to the program participant containing a clear statement of the reasons for termination;
  - 2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  - 3. Prompt written notice of the final decision to the program participant.
- C. Termination under this section does not bar the subrecipient from providing further assistance at a later date to the same family or individual.

## **5) Participation of Homeless Persons**

- A. Subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the subrecipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).
- B. If the subrecipient is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.
- C. To the maximum extent practicable, the subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

## **6) Ensuring Confidentiality**

- A. The subrecipient must develop and implement written procedures to ensure:
  - 1. All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local

- HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
  3. The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- B. The confidentiality procedures of the subrecipient must be in writing and must be maintained in accordance with this section.
- C. In addition, subrecipient should keep written records or files pertaining to families secured and only allow authorized personnel access to these files.

## 7) Building & Habitability Standards

The following habitability standards are required for shelters that receive ESG-funded operating assistance:

- **Inspections.** Current fire and health inspections must be in place during the contract period.
- **Structure and Materials.** The shelter building should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
- **Access.** The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.
- **Space and Security.** Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.
- **Interior Air Quality.** Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.
- **Water Supply.** The shelter's water supply should be free of contamination.
- **Sanitary Facilities.** Each resident should have access to sanitary facilities that are in proper operating condition. These facilities should be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.
- **Thermal Environment.** The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and Electricity.** The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- **Food Preparation.** Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
- **Sanitary Conditions.** The shelter should be maintained in a sanitary condition.

- **Fire Safety-Sleeping Areas.** There should be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.
- **Fire Safety-Common Areas.** All public areas of the shelter must have at least one working smoke detector.

## 8) Sanctions for Noncompliance

If it is determined that a subrecipient is not complying with the requirements of the ESG regulations or other applicable Federal laws, DMD in conjunction with HUD may apply one or more of a variety of sanctions against the subrecipient. These include but are not limited to requiring that previously committed ESG funds are returned or the determination to not provide future grant funding to the subrecipient.

## Chapter 3

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### ELIGIBLE ACTIVITIES

#### 1) Eligible Activities Under Administration

**ESG Administration has been allocated for coordinated entry administration at the city-wide system level. At the time of writing of this manual, Aurora with assistance from ECHO Housing Corporation, are the only two agencies conducting administration of coordinated entry. ECHO Housing Corporation is the fiscal agent of Destination: Home, our local plan to end homelessness.**

Eligible administrative costs include:

(a) *General management, oversight: and coordination:* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;
- (B) Developing systems for assuring compliance with program requirements;

- (C) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
- (D) Monitoring program activities for progress and compliance with program requirements;
- (E) Preparing reports and other documents directly related to the program for submission to HUD;
- (F) Coordinating the resolution of audit and monitoring findings;
- (G) Evaluating program results against stated objectives; and
- (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

## 2) Eligible Activities under ESG Shelter program:

### a) Homeless Assistance: Essential Services

ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter as follows:

- (i) Case Management-** the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant, including component services and activities consisting of using the I-HOPE tool, Arizona Self Sufficiency Matrix, working with local Rapid Re-housing program, conducting the initial evaluation, verifying and documenting eligibility, counseling, developing, securing, and coordinating services and obtaining Federal, State and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking.
- (ii) Child Care-** The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
- (iii) Education Services-** When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a second language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- (iv) Employment Assistance and Job Training.** The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist



individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

- (v) **Outpatient Health Services.** Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.
  
- (vi) **Legal Services.** (A) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. (B) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community. (C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants. (D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. (E) Fees based on the actual service performed (*i.e.*, fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services. (F) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.
  
- (vii) **Life Skills Training.** The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or

mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

- (viii) **Mental Health Services.** (A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. (B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community. (C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. (D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- (ix) **Substance Abuse Treatment Services.** (A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. (B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community. (C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
- (x) **Transportation.** Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following: (A) The cost of a program participant's travel on public transportation; (B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants; (C) The cost of purchasing or leasing a vehicle for the subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and (D) The travel costs of subrecipient staff to accompany or assist program participants to use public transportation.
- (xi) **Services for Special Populations.** ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking,

including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

**(xii) Ineligible Essential Services Activities:**

- Salary of case management supervisor when not working directly on participant issues/clients
- Staff bonuses that do not reflect actual hours worked
- Advocacy, planning, and organizational capacity building
- Staff recruitment or training, including conferences
- Transportation costs not directly associated with service delivery

**3) Homeless Assistance: Operational Costs**

Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel (natural gas for the building itself; not vehicle fuel), equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. In the event that an appropriate emergency shelter is not available eligible costs may also include a hotel or motel voucher for eligible households.

**1. Limitations on Funding Operational Costs**

Staff salaries (including fringe benefits) paid under the operating costs category is limited to 10 percent of the grant. For example, a subrecipient receiving a \$25,000 ESG grant would be able to pay only \$2,500 (or 10 percent of that amount) for operational staff costs. Maintenance and security salary costs are not subject to the 10 percent cap.

**2. Ineligible Operational Costs include but are not limited to:**

- Recruitment or on-going training of staff
- Depreciation
- Costs associated with the organization rather than the shelter program (advertisements, pamphlets about organization, survey, etc.)
- Staff training, entertainment, conferences, or retreats
- Public relations or fund raising
- Bad debts/late fees
- Mortgage payments

**4) Eligible Activities Under ESG Street Outreach**

**There are six (6) eligible activities under the ESG Street Outreach program:**

Note: The only program allocated to receive 2017 ESG Street Outreach funds is the Coordinated Entry Assessment Team (CEAT) at Aurora. Traditional street outreach is funded by CDBG funds as part of crisis intervention for fiscal year 2017.

- 1. Engagement**
- 2. Case Management**
- 3. Emergency Health Services**

- 4. Emergency Mental Health Services**
- 5. Transportation**
- 6. Services for Special Populations**

**1. Engagement-**The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

**2. Case Management-** The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

**3. Emergency Health Services-**

(i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

**4. Emergency Mental Health Services-**

(i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

(iii) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

**5. Transportation-** The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(i) The cost of a program participant's travel on public transportation;

(ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(iii) The cost of purchasing or leasing a vehicle for the subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

(iv) The travel costs of subrecipient staff to accompany or assist program participants to use public transportation.

**6. Services for Special Populations-** ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

## **Chapter 4**

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### **REPORTS & HMIS**

#### **1) Reports**

ESG subrecipients are required to submit data upon request and annual report to DMD. Please *e-mail* these reports to DMD.

#### **2) Homeless Management Information System**

The Homeless Management Information System (“HMIS”) is a secure, confidential electronic data collection system used to determine the nature and extent of homelessness. **The Subrecipient is required to enter data into HMIS on a regular and consistent basis, which is defined as data entry within two weeks from the time of intake.\***

**HMIS is managed by IHCDA on behalf of the City of Evansville agencies as part of the Indiana Balance of State CoC.**

DMD will help regularly monitor HMIS usage to verify consistent data entry for applicable shelters. Data must be entered for the ESG funded shelter program and all other residential programs serving homeless individuals and families. The HMIS data elements to be collected are determined by HUD. The HMIS system is used to report to HUD on an annual basis and to aid in local and statewide policy and planning.

Subrecipients that utilize Essential Service funds for Case Management activities are required to enter all relevant client level data including case notes into HMIS or DV ClientTrack (if the subrecipient is a victim services provider) on a consistent basis.

Victim services providers are not allowed to enter data into the HMIS but must enter data into a comparable database as described below.

Victim service providers must enter client-level data on ESG beneficiaries/clients into a comparable database, which collects all of the HMIS universal data elements listed in this paragraph and generates unduplicated aggregate reports. Victim service providers are encouraged to use DV ClientTrack database. The data required for entry into DV ClientTrack database or the victim service provider's comparable database must include the following data elements: Name, Social Security Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Zip Code, Length of Stay at Previous Residence and Homeless Cause.

To sign up for DV ClientTrack, please contact Jill Robertson at [jrobertson@ihcda.in.gov](mailto:jrobertson@ihcda.in.gov) at IHCDA. Victim service providers within the Balance of State Continuum of Care can choose to opt into DV ClientTrack. Access to the data entered into the system will be restricted to the organization that entered it and therefore the system will be compliant with the Violence Against Women's Act (VAWA). The system will collect client-level data over time including, but not limited to all of HMIS's universal data elements, and generate unduplicated aggregate reports based on the data. Information entered into this comparable database will not be entered directly into or provided to an HMIS.

**3) Statewide Point-in-Time Homeless Count**

The subrecipient is required to participate in the annual Statewide Point-in-Time count in collaboration with its regional Continuum of Care by submitting appropriate data upon request by deadlines established by the IHCDA ESG Program Coordinator or the HMIS/ClientTrack Manager.

All subrecipients will be required to meet the following minimum standards for HMIS/ESG data collection and reporting;

- Subrecipients must enter into a HMIS/ESG Agency Participation Agreement and attend User training if they have not already attended.
- All subrecipient staff that participates in ESG eligible activities must have regular and convenient access to a computer with a high speed Internet connection.
- All subrecipient staff that participates in ESG eligible activities must have a unique assigned user name and password that they can access regularly during

work hours. Each such user must sign a Code of Ethics statement prior to receipt of their log in and password.

## **Chapter 5**

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### **AWARD MONITORING**

DMD will monitor a minimum of 33% every year, with the expectation that all programs will be monitored no less than every three years. New subrecipients and programs with new essential employees will be monitored within the first year of their grant agreement with DMD.

Subrecipients are expected to make available all participant level, financial and program records for periodic review on a schedule to be established by DMD. In addition, subrecipients will maintain participant files in compliance with the standard set by DMD. Significant deficiencies in file content or quality will result in required Plans of Corrective Action, with possible loss of allocated funds upon discovery of continuing deficiencies.

Program compliance and HMIS usage and data integrity will also be subject to regular and random monitoring by DMD staff. Monitoring of subrecipients may be conducted by DMD, IHCDA, local HUD Office of Community Planning and Development, HUD's Office of Special Needs Assistance Programs, HUD's Office of Inspector General, HUD's Office of Fair Housing and Equal Opportunity, or another federal agency to determine whether the subrecipient complied with the requirements of this program.

All shelters who will be subject to on-site monitoring will receive at least two weeks notification prior to the visit confirming the date and time of the monitoring and a monitoring checklist. The checklist contains a list of areas that will be reviewed and documents that will need to be made available at the time of monitoring.

Upon completion of the review, DMD will send a letter detailing all concerns and findings discovered during the monitoring visit. Agencies will be notified within 30 days of the monitoring visit unless an investigation of findings requires more time. If there are findings or concerns discovered, DMD will request the agency to submit a specific resolution or correction within a certain period of time.

Additionally, DMD staff may be available throughout the program year to conduct interim monitoring to help new subrecipients or agencies with new staff ensure their continued compliance with the ESG program. Please contact the ESG Coordinator to schedule an interim monitoring.

## Chapter 6

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### FINANCIAL MANAGEMENT

Before a subrecipient may first request reimbursement for ESG funds expended on specific activities/budget line items, the following items must be received by DMD:

- Signed/executed award agreement;
- Completed budget page aka Actual Project Information Form ;
- Authorized signature form for e-verify;
- Notice to Proceed
- Current enrolled status in System Awards Management (SAM); and
- Requested documentation in response to conditional funding (if applicable)
- **1:1 Match letter or affidavit for eligible ESG activities not used for match elsewhere.**

#### 1) **Match**

Each subrecipient must match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. A subrecipient may comply with this requirement through matching funds or voluntary efforts provided by DMD or project sponsor. Matching funds must be provided after the date of the grant award to the subrecipient. Funds used to match a previous ESG grant may not be used to match a subsequent grant award. No federal funds can be used for match, with the exception of Community Development Block Grant (CDBG).

All ESG Subrecipients are required to match their ESG program, one-to-one. For example, if the ESG award is \$10,000, the subrecipient must demonstrate \$10,000 as match. A match letter or affidavit must be submitted before a Notice to Proceed will be issued. Match must be used on ESG eligible activities not claimed as match elsewhere. The following items may be used as match:

Type of Match	Documentation required
Cash/Grant	Award letter or affidavit
Value or fair rental value of any donated material or building	Documentation of value of donated material or building. Documentation of previous year's match.
Value of any lease on a building	Documentation of value of lease on a building
Any salary paid to staff to carry out the program of the subrecipient	Timecards of staff member. Proof of salary payment (cancelled checks / bank statements). Summary list of all salaries counted as match. List should contain staff name, hours worked and total monetary value of time worked.
Value of the time and services contributed by volunteers to carry out the program of the subrecipient. (Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the local community.)	List containing all volunteer names, number of hours worked and total value of time contributed.



### Examples of Possible Sources of ESG Match

Below are some examples of match that could be used as ESG match. Please note that in order for the match to be counted, the source must be eligible and its use must be an eligible ESG activity. Match can be provided by the subrecipient itself OR any other community agency, but must directly benefit the ESG participants and be provided during the award term in order to be counted. This list is not exhaustive.

In-Kind	Cash
211 Helpline: Time conducting I-HOPE assessments or other eligible expenses.	CDBG, CSBG
AIDS/HIV-related services provided to ESG participants	City or County funds
Alcohol and substance abuse services	Community Action Agencies
Bookkeeping/Administrative services for ESG program (but not billed to ESG)	Donations received as a result of the Neighborhood Assistance Program
Budgeting, credit repair service provided to participants in the community (but not billed to ESG)	ICJI grants, as eligible
Case management (not billed to ESG)	Local Foundations
Child care	Private donations
Clothing, Household, Hygiene items donated	Program income
Community Center - educational meetings related to housing, transportation vouchers, other eligible financial assistance	United Way
Donation Inventory Management	Township Trustees(s) assistance provided to ESG participants
Education, GED, classes (parenting)	
Employment assistance & Job Training	
Emergency Shelter/ Transitional Housing - services provided in program, not billed to ESG	
Faith Based Community; Ecumenical/Ministerial associations	
Food donated to participants by local churches (food stamps <i>cannot</i> be counted)	
Furniture donated	
Health care	
Housing Food kit, Move-in kit preparation	
Housing placement	
Hygiene Kit preparation	
Legal Services	
Life skills Training not billed to ESG	
Mental health services (CMHC's)	
Minority Health Coalitions	
Motel Stays	
Move in Kits donated	
Office space donated	
Street Outreach: Engagement, case management, emergency mental health services, transportation, services to special populations	
Outpatient Health services - Community Health Centers, other medical centers	
Rent, not paid with ESG	
Renovation of shelter facility, benefiting ESG participants	
School Corporations- eligible services provided to ESG participants	
Transportation	
Utilities, not paid with ESG	

Utility Companies- any amount that is waived from arrears or deposits off of amount due	
Volunteer - professional - local, customary rate	

**2) Budget Modifications**

At some point during the program year, the subrecipient may need to reallocate funds budgeted among their approved activities.

The Actual Project Information Sheet is required to submit budget modifications and is subject to approval by DMD.

Generally, increases and decreases of funds within previously approved activities will be approved. Budget modifications that request payment for something that has not been previously claimed will require further review, and may potentially be denied, although the DMD always tries to accommodate and serve agencies for reasonable requests.

**3) Claims**

***IMPORTANT INFORMATION ON:  
HOW TO PROPERLY SUBMIT INVOICES FOR PAYMENT***

Department of Metropolitan Development  
Updated February 2016

**WHEN IN DOUBT, CONTACT YOUR COMMUNITY DEVELOPMENT  
SPECIALIST (CDS)**

**Overview:**

When submitting invoices for payment to the Department of Metropolitan Development, it is important that the information be submitted in a legible and concise order. Once received by DMD each invoice is reviewed a minimum of four (4) times before payment approval. In order to save time and prevent problems with the invoice payment and claim processing (prepared by DMD), it is important that you check to be sure you have submitted all the required paperwork and that your figures add up.

**Claims are paid on a reimbursement basis** and each reimbursement request submitted will be required to have five (5) basic components – however - Additional information may be required based on type of program.

1. An Operating Agency Invoice form properly signed and dated;
2. An Operating Agency Invoice Form, must be completed summarizing the items to be paid;
3. A copy of the monthly monitoring report for the month and/or a project status report, being reimbursed;
4. Copies of cleared checks (front & back) or a copy of the bank statement(s) verifying checks have cleared the account;
5. Supporting documentation with items for reimbursement highlighted.

**If any one of the above items are missing or are incomplete, the agency will be contacted to correct the claim and resubmit for payment. All invoices are to be turned**

**in by the last day of October, exceptions need to be approved by DMD. As soon as Public Service Agencies receive their Notice to Proceed, they should turn in invoices from January to current date.**

**Claim Order:**

There is a definite order for submitting reimbursement request in order to speed processing. That order is:

1. Operating agency invoice form properly completed. Properly completed means:
  - a. The expenses are properly broken down by line item
  - b. The invoice is signed by a representative of the agency (at least one copy must contain an original signature).
  - c. Each invoice must have a unique invoice number YY-ACCOUNT#-XX. “YY”= year is 16 for 2016, “ACCOUNT#” will be provided to you by your Community Development Specialist, “XX” is the sequential number of the invoice, 01 for 1<sup>st</sup> invoice submitted, 02 for 2<sup>nd</sup> invoice submitted, etc.
  - d. The invoice is dated the day it is signed. This is not the month you are requesting payment. Example of correct date: 7/12/13. Example of incorrect date: July 2013
2. Summary sheet with a breakdown of all expenses to be reimbursed. This summary sheet must be organized in the same order as the line items on the invoice form. It should list the amounts to be reimbursed and subtotaled by line item.
3. Copy of the monthly monitoring report (when applicable).
4. Copies of cleared checks (front & back) or a copy of the bank statement with check numbers and amounts highlighted to verify the checks have cleared your account (where applicable).
5. Support documentation in the following order for each amount to be paid. **Again, these should be organized in the same order as they are listed on the summary sheet.**
  - a. Salaries:
    - i. Costs that may be submitted for reimbursement include: Salary amount, health insurance and FICA. Copy of the paycheck with stub or a payroll journal from a third party. No in-house payroll journals will be accepted.
    - ii. Copies of actual time sheets for all employees’ salaries requested. The third-party payroll summary does not substitute for the timesheets. If the employee works on more than one program, the time sheet should show the amount of time spent on the program as well as total time worked. **All time sheets should be signed by the employee and supervisor.**
  - b. All other costs:
    - i. Copy of the check. If your bank statement includes copies of the check, you may submit that copy. If it does not, you must make a copy of the **signed** check.
    - ii. Copy of the invoice(s) the check is paying. If the invoice is a credit card bill, copies of the original receipts should be attached immediately behind the credit card bill to show details of items purchased. If you purchased something on credit, you must submit the credit card bill and the check copy in order to be reimbursed.
    - iii. Copies of all bills showing they have been paid, i.e. Utilities = Vectren bill & water bill.

- iv. Copies of all receipts for items purchased for your project. Receipt must clearly state items purchased.
- v. If cost is for printing, a copy of the item printed should be included and must include the required acknowledgement(s).
- vi. If cost is for travel, you should also include a copy of verification of training (agenda or certificate of completion) and copies of all receipts to be reimbursed. Please note that travel expenses will not be reimbursed without receipts and an approved Travel Request Form from DMD.

**Things to remember:**

1. **All invoices are to be turned in by the last day of October, exceptions need to be approved by DMD. As soon as Public Service Agencies receive their Notice to Proceed, they should turn in invoices from January to current date.**
2. Double-check your work. Math errors are the number one reason invoices are sent back for corrections.
3. Copies must be complete and legible. Make sure documentation is not partially cut off when making copies.
4. Late fees and finance charges are not eligible expenses.
5. We do not pay past due amounts. You must submit current invoices.
6. Taxes are not eligible expenses for non-profits. The exception to this rule is hotel taxes.
7. Gifts, refreshments, etc. for staff and volunteers are not eligible expenses.
8. If requesting reimbursement for salaries and benefits for employees that spend time on more than one program, the time sheets must show a breakdown of time spent on each program. Salaries and benefits must be prorated based on the actual time spent on the program. If an employee is salaried and works more or less than 40 hours per week, reimbursement should be calculated as a percentage of time spent on the program, based on the actual hours worked.
9. If requesting reimbursement for rent and more than one program is provided at the same location, the rent must be prorated based on the space used by the programs.
10. **Invoices are public records. Please black out social security numbers and account numbers.**
11. **We do not pay from statements.** The exceptions to this rule are:
  - a. If the statement is for a service such as pest control and the vendor does not provide an invoice. Please provide a copy of the work order along with the statement.
  - b. The statement has very detailed information showing a complete listing of all charges in sufficient detail.
12. Invoices must be submitted monthly along with the monitoring report.
13. The amount invoiced must be tied (when applicable) to the number served and per unit cost (copy of monthly monitoring report.)
14. ***ALL REIMBURSEMENT REQUESTS SHOULD BE SUBMITTED TO THE FRONT DESK FOR DATE STAMPING AND RECORDING IN THE INVOICE LOG PRIOR TO BEING GIVEN TO THE CDS.***

**4) OMB Audit and Financial Statements:**

Each year, DMD collects Year-End Financial Statements and OMB audits from its subrecipients. To provide better customer service we have changed the submission process.

Organizations that are required to submit an OMB Audit formerly A133 must send their financials to DMD.

Organizations that are not required to submit an OMB audit still must submit their financials.

**OMB Audit Required:**

Subrecipients that expend \$750,000 or more in federal funds (as a collective whole from all of their federal awards) in a fiscal year must be audited in accordance with the requirements of 2 CFR 200.501, and provide a copy of such audit to DMD and to the Federal Audit Clearinghouse. If this applies to your organization, please submit a copy of your financial statements and OMB Audit to DMD.

**OMB Audit Not Required:**

Subrecipients that do not spend over \$750,000 in federal funds (as a collective whole from all of their grants) will only need to submit their year-end financial statement or Form 990. If this applies to your agency, please send a copy of year-end financial statement or Form 990.

**Mandatory Disclosure.**

The subrecipient must disclose, in a timely manner, in writing to DMD all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the ESG funds. The subrecipient's failure to make these disclosures may subject to the subrecipient to remedies of non-compliance set forth in 2 CFR 200.338.

If the total value of the subrecipient's currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the subrecipient must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in paragraph 2 of this award term and condition. This is a statutory requirement under section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.

## **Chapter 7**

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### **CIVIL RIGHTS /ACCESSIBILITY**

As a recipient of federal funds, you are required to maintain compliance with civil rights and fair housing laws. The information in this chapter is provided to educate you on your requirements and as a resource tool to assist you in facilitating access to housing for your clients. If you have specific questions about any of the laws please contact DMD for clarification.

The Fair Housing Act states that it is illegal to discriminate against any person because of race, color, religion, sex, handicap, familial status, or national origin in:

- the sale or rental of housing or residential lots;
- advertising the sale or rental of housing;
- the financing of housing;
- the provision of real estate brokerage services; and
- the appraisal of housing.

The Fair Housing Amendments Act of 1988 Final Committee Report to the House of Representatives (100-711) dated June 17, 1988 provides the background information to the Fair Housing Law and Committee intentions when submitted to Congress. The Fair Housing Amendments became Public Law 100-430 on September 13, 1988 to amend Title VIII, commonly called The Civil Rights Act of 1968. This legislation revised certain procedures and implemented new protections and enforcement. On Monday, January 23, 1989, the Federal Register contained the Final Rule for implementation of the Fair Housing Amendments Act of 1988. The effective date of this legislation was March 12, 1989 with the specific provisions for new construction effective March 13, 1991.

Fair Housing legislation is clear in regard to discriminatory practices and penalties. The law does not intend to prohibit property owners, managers, and administrators from valid inquiries into an applicant's ability to meet lease requirements and/or program eligibility requirements as set forth in Federal or State programs or in a Tenant Selection Criteria. However, there are certain areas that owners, managers, and administrators must clearly understand in regard to legitimate questions and disallowed inquiries. These are discussed below:

1. Independent Living - An owner, manager, or administrator should not attempt to assess whether an applicant is capable of independent living but only whether the applicant meets essential eligibility requirements. If an applicant requires supportive services but does not ask that they be provided, the need for supportive services should not be considered a factor in determining eligibility. If the provision of supportive services is part of the housing program, then these services should be provided in a non-discriminatory manner. However, no provider is required to take any action which would fundamentally alter the nature of the program in order to accommodate the disability of an applicant or tenant. Restriction of Children/Handicapped in Housing: Evacuation Safely - There can be no restriction as to where persons may reside in housing with the exception of Federal or management priorities for certain adapted or accessible units. Accepting or rejecting applicants on the basis of the ability to evacuate safely is not allowed.
2. Legal and Illegal Questions - The Fair Housing Law clearly defines legal and illegal questions for all applicants of all housing in the United States. It is unlawful to make an inquiry to determine whether an applicant for a dwelling,

a person intending to reside in that dwelling after it is sold, rented or made available, or any person associated with that person, has a handicap or to make inquiry as to the nature or severity of a handicap of such a person.

However, the following inquiries can be made, **provided these inquiries are made to all applicants, whether or not they have handicaps:**

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy;
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with handicaps or to persons with a particular type of handicap;
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with handicaps or to persons with a particular type of handicap;
- Inquiry to determine whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance;
- Inquiry to determine whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance.

A manager or owner is never required to make available a dwelling to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals, or whose tenancy would result in substantial physical damage to the property of others.

### **Subrecipient Required Actions**

Subrecipients are required to make ESG funded facilities and services available to all on a nondiscriminatory basis, and publicize this fact. The procedures that a subrecipient uses to convey the availability of such facilities and services should reach persons with handicaps, or persons of any particular race, color, religion, sex, age, familial status or national origin within their service area who may qualify for them.

If not, the subrecipient must establish additional procedures that will ensure that these persons are made aware of the facilities and services. Subrecipients must adopt procedures to disseminate information to anyone who is interested regarding the existence and location of handicap accessible services or facilities.

**Subrecipients are required to post Fair Housing Opportunity poster and Handicap accessibility poster if applicable.** If a shelter cannot provide handicap accessibility services, then they must provide a procedure to refer individuals to accessible services or facilities.

**Subrecipients** operating Emergency Shelter and Transitional Housing are required to post Fair Housing Logos on materials given to participants.



## Civil Rights Laws *Introduction*

The civil rights laws, regulations, and executive orders are designed to protect individuals from discrimination on the basis of race, national origin, religion, color, sex, age and handicap status. These laws, regulations, and executive orders, as they apply to the ESG program, protect individuals from discrimination in housing, the use of public facilities and services, benefits created by ESG projects, and employment and business opportunities.

The following is a summary of the regulations.

### *Title VI - Civil Rights Act of 1964*

Title VI provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. It directs each federal department or agency that extends financial assistance to any program or activity through grants, loans, or contracts, except contracts of insurance or guaranty, to issue rules or regulations to be approved by the President to carry out the purposes of the Title. Title VI authorizes the termination or the refusal to grant or continue federal assistance under any program or activity involving a recipient receiving an express finding of a failure to comply, but only after due notice, an opportunity for a hearing, and a determination that compliance cannot be secured by voluntary means.

In accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, subrecipient agrees to take reasonable steps to ensure meaningful access to activities for LEP persons. Any of the following actions could constitute “reasonable steps”, depending on the circumstances: acquiring translators to translate vital documents, advertisements, or notices, acquiring interpreters for face to face interviews with LEP persons, placing advertisements and notices in newspapers that serve LEP persons, partnering with other organizations that serve LEP populations to provide interpretation, translation, or dissemination of information regarding the project, hiring bilingual employees or volunteers for outreach and intake activities, contracting with a telephone line interpreter service, etc.

### *Title VII – Civil Rights Act of 1964 (as amended)*

This provision prohibits discrimination in employment on the basis of sex.

### *Title VIII – Civil Rights Act of 1968*



Title VIII prohibits blockbusting, or discrimination in the sale or rental of dwellings, the financing of housing, or advertising. Title VIII makes it unlawful to deny any person access to, membership, or participation in any multiple listing service or real estate brokers' organization for discriminatory reasons. The law is applicable in stages and ultimately applies to all dwellings except those which are specifically exempt. Title VIII generally does not apply to the sale or rental of a single family house by a private individual owner who does not own more than three such single-family houses at any one time. After December 31, 1969, the sale or rental of any such single-family home is exempted from the application of Title VIII only if it is sold or rented without the use of a broker and without discriminatory advertising. The act does not apply to rooms or units in dwellings containing living quarters occupied by not more than four families living independently of each other and the owner occupies one of such quarters as his or her residence.

Also exempted is the sale or rental of dwellings owned or operated by religious organizations, for other than a commercial purpose, to persons of the same religion unless membership in such religion is restricted on account of race, color or national origin. Neither does Title VIII prohibit a private club, not open to the public and providing lodging which it owns or operates for other than commercial purposes, from limiting rental or occupancy to its members.

### *Section 3: Housing and Urban Development Act of 1968*

Section 3 provides that to the greatest extent feasible, training and employment opportunities shall be made available to low-income residents of project areas and that contracts be awarded to small businesses located within the project area or owned in substantial part by project area residents.

### *Section 109: Housing and Urban Development Act of 1974*

Section 109 provides that no person in the United States shall on the ground of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part under this title.

### *Section 504: Rehabilitation Act of 1974*

Section 504 provides that no otherwise qualified handicapped individual in the United States, as defined in Section 7(6), shall, solely by reason of this handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

### *Age Discrimination Act of 1975*

The Act provides that no person in the United States on the basis of age shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

### *Executive Order 11063*

Executive Order 11063 provides that no person on the basis of race, color, religion, sex or national origin, shall be discriminated against in:

- Housing (and related facilities) provided with federal assistance.
- Lending practices, with respect to residential property, when such practices are connected with loans insured or guaranteed by the federal government.

*Executive Order 11246, as amended by Executive Order 11375*

Executive Order 11246, as amended by Executive Order 11375, provides that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in any phase of employment during the performance of federal or federally assisted construction contracts in excess of \$25,000.

*Executive Order 12138: Women Business Enterprise Policy*

For purposes of this Order, affirmative action may include, but is not limited to, creating or supporting new programs responsive to the special needs of women business enterprises, establishing incentives to promote business or business-related opportunities for women business enterprises, collecting and disseminating information in the support of women business enterprises and ensuring to women business enterprises knowledge of any ready access to business-related services and resources. In implementing this Order an agency undertakes to use or to require compliance with numerical set-asides or similar measures. It shall state the purpose of such measure and the measure shall be designed on the basis of pertinent factual findings of discrimination against women's business enterprise and the need for such measure.

*Minority and Women Business Participation*

Minority-owned and women-owned business enterprises (MBE/WBE's) shall have the maximum feasible opportunity to participate in the performance of contracts under federal grant programs. Award recipients shall exercise their "best efforts" to ensure that MBE/WBE's are given the opportunity to participate in ESG-funded contracts, including contracts for services, supplies and construction activities. Indiana has adopted a goal of 11.47% participation by minority owned business enterprises and 5.93 for women-owned business enterprises in federally funded activities.

A minority- or women-owned business enterprise is defined for this program as a business which has been established for at least one year and is 51% owned, operated and controlled by minorities or women. Corporation or partnerships formed merely to qualify as an MBE or WBE for purposes of this program will not be considered minority or women-owned business enterprises.

Award recipients are required to maintain documentation supporting their "best efforts" to achieve the state goal of 11.47% minority owned business enterprise participation and/or 5.93% women-owned business enterprise participation on all ESG-funded procurement

and contract solicitation. To document “best efforts” and attain the goals, the following steps should be taken to solicit bids from and encourage participation by minority- or women-owned business enterprises:

1. Where legal notice is required by law, include language notifying bidders of the 11.47% and 5.93% MBE/WBE participation goal on the project.
2. Contact DMD or the Indiana Department of Administration Minority Business Development Division for a referral list of firms in the categories of work needed for the development including professional services, supply, and construction services.
3. Contact at least two (2) MBE/WBE firms from the referral list, notifying them of the impending bidding opportunity and how to participate.
4. If award recipients anticipate the use of subcontractors or additional purchasing contracts for supplies, then the referral list of qualified minority- and women-owned businesses should be disbursed to all prime contractors at this conference. Award recipients should supply a copy of the plans and specifications as well as a list of the organizations that will have plans and specification on file.
6. Award recipients must maintain documentation supporting their “best efforts” for monitoring and auditing purposes. **Award recipients must document solicitation of MBE/WBE firms through Certified Mail receipts, Certificates of Mailing, or receipts from hand-delivery of notices.**

## **Chapter 8**

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### **CONFLICT OF INTEREST**

#### **1) Requirements**

- A. The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under 24CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- B. The subrecipient must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from

a firm considered for a contract. The officers, employees, and agents of the subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the subrecipient may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the subrecipient.

- C. If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

## **2) HUD Procedure for Individual Conflicts of Interest**

### **A) Conflicts Prohibited**

No persons (as described in persons covered) who exercise or have exercised any functions or responsibilities with respect to ESG activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

### **B) Persons Covered**

The conflict of interest provisions apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, subrecipients which are receiving ESG funds.

### **C) Exceptions**

A request for an exception to this conflict of interest prohibition will be considered by DMD only after the subrecipient has provided the following:

1. A copy of the minutes from a public meeting denoting that the affected person has publicly disclosed the conflict of interest and has stated that he/she has withdrawn from functions or responsibilities with respect to the assisted activity in question.

An opinion from the subrecipient's attorney that the interest for which the exception is sought would not violate State or local law.

Once DMD receives minutes of the public meeting and an opinion from the subrecipient's attorney, DMD will respond in writing as to whether or not an exception to the conflict of interest prohibition has been granted.

Should DMD approve the subrecipient's request, a completed Uniform Conflict of Interest Disclosure Statement must be provided to DMD as well as filed with the State Board of Accounts and the Clerk of the Circuit Court of the county in which the governmental entity executed the contract or purchase within 15 days after the final action toward awarding ESG funds to the person in question. A copy of this form can be found at <http://www.in.gov/sboa/files/Form236.pdf>.

DMD will approve an exception to this conflict of interest prohibition only after it has been determined that such an exception will serve to further the purpose of the Act and the effective and efficient administration of the ESG program.

**UNIFORM CONFLICT OF INTEREST DISCLOSURE STATEMENT**

**Indiana Code 35-44-1-3**

A public servant who knowingly or intentionally has a pecuniary interest in or derives a profit from a contract or purchase connected with an action by the governmental entity served by the public servant commits conflict of interest, a Class D Felony. A public servant has a pecuniary interest in a contract or purchase if the contract or purchase will result or is intended to result in an ascertainable increase in the income or net worth of the public servant or a dependent of the public servant who is under the direct or indirect administrative control of the public servant; or receives a contract or purchase order that is reviewed, approved, or directly or indirectly administered by the public servant. "Dependent" means any of the following: the spouse of a public servant; a child, stepchild, or adoptee (as defined in I.C. 31-3-4-1) of a public servant who is unemancipated and less than eighteen (18) years of age; and any individual more than one-half (1/2) of whose support is provided during a year by the public servant.

The foregoing consists only of excerpts from I.C. 35-44-1-3. Care should be taken to review I.C. 35-44-1-3 in its entirety.

1. **Name and Address of Public Servant Submitting Statement:** \_\_\_\_\_  
\_\_\_\_\_

2. **Title or Position With Governmental Entity:** \_\_\_\_\_  
\_\_\_\_\_

3. a. **Governmental Entity:** \_\_\_\_\_  
b. **County:** \_\_\_\_\_

4. **This statement is submitted (check one):**  
a. \_\_\_\_\_ as a "single transaction" disclosure statement, as to my financial interest in a specific contract or purchase connected with the governmental entity which I serve, proposed to be made by the governmental entity with or from a particular contractor or vendor; or  
b. \_\_\_\_\_ as an "annual" disclosure statement, as to my financial interest connected with any contracts or purchases of the governmental entity which I serve, which are made on an ongoing basis with or from particular contractors or vendors.

5. **Name(s) of Contractor(s) or Vendor(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. **Description(s) of Contract(s) or Purchase(s)** (Describe the kind of contract involved, and the effective date and term of the contract or purchase if reasonably determinable. Dates required if 4(a) is selected above. If "dependent" is involved, provide dependent's name and relationship):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. **Description of My Financial Interest** (Describe in what manner the public servant or "dependent" expects to derive a profit or financial benefit from, or otherwise has a pecuniary interest in, the above contract(s) or purchase(s); if reasonably determinable, state the approximate dollar value of such profit or benefit.):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Attach extra pages if additional space is needed)

8. **Approval of Appointing Officer or Body** (To be completed if the public servant was appointed by an elected public servant or the board of trustees of a state-supported college or university):

I (We) being the \_\_\_\_\_ of  
(Title of Officer or Name of Governing Body)

\_\_\_\_\_ and having the power to appoint  
(Name of Governmental Entity)

the above named public servant to the public position to which he or she holds, hereby approve the participation to the appointed disclosing public servant in the above described contract(s) or purchase(s) in which said public servant has a conflict of interest as defined in Indiana Code 35-44-1-3; however, this approval does not waive any objection to any conflict prohibited by statute, rule, or regulation and is not to be construed as a consent to any illegal act.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Elected Official

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Office

9. **Effective Dates** (Conflict of interest statements must be submitted to the governmental entity prior to final action on the contract or purchase.):

\_\_\_\_\_  
Date Submitted

\_\_\_\_\_  
Date of Action on Contract or Purchase

10. **Affirmation of Public Servant:** This disclosure was submitted to the governmental entity and accepted by the governmental entity in a public meeting to the governmental entity prior to final action on the contract or purchase. I affirm, under penalty of perjury, the truth and completeness of the statements made above, and that I am the above named public servant.

Signed: \_\_\_\_\_  
(Signature of Public Servant)

Date: \_\_\_\_\_

Within 15 days after final action on the contract or purchase, copies of this statement must be filed with the State Board of Accounts, Indiana Government Center South, 302 West Washington Street, Room E418, Indianapolis, Indiana, 46204-2765 and the Clerk of the Circuit Court of the county in which the governmental entity executed the contract or purchase. A copy of this disclosure will be forwarded to the Indiana State Ethics Commission.

## Chapter 9

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### LEAD BASED PAINT REQUIREMENTS

#### 1) *Background*

The primary cause of childhood lead poisoning is deteriorating lead-based paint and lead-contaminated dust and soil in older housing units. Although lead was banned from residential house paint in 1978 by the Consumer Product Safety Commission (CPSC), an estimated 57 million older homes still contain some lead-based paint. Of these, some 3.8 million dwellings are thought to have both lead-based paint hazards and young children as residents.

The amount of lead-based paint in housing is significant. Tens of millions of housing units contain at least some lead-based paint. Children living in homes with lead-based paint become exposed to lead by directly eating chips of lead-based paint or chewing on protruding surfaces painted with lead-based paint. The more common route of exposure, however, is the ingestion of lead-bearing dust that is generated by the paint when it deteriorates, chinks, or is disturbed through renovation or even abrasion from the opening and closing of windows. Even in this less direct way, lead-based paint can be a source of lead poisoning.

The most common route of exposure for children is through ingestion of lead-contaminated dust. This dust sticks to moist hands as a child plays or crawls across the floor, and is then ingested via finger sucking or other normal hand-to-mouth activity. A child can also be poisoned by eating lead-based paint chips and lead-contaminated soil, and by being exposed to other environmental sources of lead from inside and outside the home. Additionally, repair and renovation activities, such as repainting, that disturb lead-based paint can generate significant levels of leaded dust to which children can be easily exposed.

“Lead-based paint hazards” have been defined in the Residential Lead-Based Paint Hazard Reduction Act of 1992, commonly referred to as “Title X,” as any of six conditions which can present lead exposures sufficient to cause adverse health effects. These include:

1. lead-contaminated dust;
2. deteriorated lead-based paint;
3. intact lead-based paint on friction surfaces;
4. intact lead-based paint on impact surfaces;
5. intact lead-based paint on chewable surfaces accessible to young children; and
6. lead contaminated bare soil.

#### 2) *ESG Lead Requirements*



Since the ESG program deals primarily with the operation of short-term emergency shelters and the delivery of essential services to homeless persons, ESG is governed by Subpart K of the Lead-Based Paint regulations. According to the regulations, most emergency shelters are exempt from the lead-based paint regulations. Thus emergency housing using efficiencies, studio apartments, dormitories, single room occupancy units, barracks, group homes, or room rentals in residential dwellings are all excluded from the lead based requirements. The only ESG-assisted housing covered under the lead based paint requirements is longer-term transitional housing in an apartment with one or more bedrooms AND which has family residents who are part of a program requiring continual residence of more than 100 days.

The majority of ESG projects, with their relatively short stays in HUD-assisted housing, are exempt from the lead-based paint requirements. However, any ESG housing or services sites regularly frequented by children less than 6 years of age are encouraged to test for lead.

For long-term transitional housing, DMD requires all subrecipients to participate in educating the public on the hazards of lead poisoning. The EPA Lead brochures must be distributed to all households receiving long-term rental assistance. Documentation of this brochure must be maintained in each client file.

### *3) Essential (Support) Services and Operations*

For eligible ESG Housing properties that receive federal assistance for essential supportive services or operations, a number of lead-based paint requirements apply. The subrecipient / should conduct the following activities:

1. Visual assessment of all painted surfaces to identify deteriorated surfaces;
2. Complete paint stabilization of all deteriorated surfaces.
3. Incorporate ongoing lead-based paint maintenance activities into the regular building maintenance operations; and
4. Notification as described above.

### *4) Exemptions to the New Lead Based Paint Requirements*

- Residential structures built after January 1, 1978;
- Emergency action activities;
- Existence of Lead-Based Paint Unlikely;
- Areas where state and local governments banned lead-based paint prior to January 1, 1978;
- Properties found not to have lead-based paint during earlier testing that meets the requirements of prior evaluations;
- Properties where all lead-based paint has been identified and removed using approved methods;
- Human Threat Unlikely;
- Unoccupied units that will be demolished;
- Property not suitable for human residential habitation

- Rehabilitation that does not disturb paint;
- Child Occupancy Unlikely;
- Zero-room dwelling units;
- Elderly and disabled housing; and
- Emergency housing assistance (such as for the homeless) unless the assistance is for long-term assistance that lasts more than 100 days. In the case where longer-term housing assistance lasts for more than 100 days, then rule does apply.

#### 5) *Long-term Rental Assistance*

If there will be a child under the age of 6 residing in the unit receiving ESG long-term housing, the award subrecipient must conduct a visual assessment for the presence of lead-based paint. Award Subrecipients cannot provide long-term rental assistance to any unit with lead-based paint present.

#### 6) *Lead Hazard Evaluation*

The interior and exterior surfaces and common areas of the rental property must be visually assessed to identify deteriorated paints. Note: A visual assessment is not considered an evaluation that requires a notification of lead hazard evaluation, since the assessment does not evaluate lead-based paint and/or lead hazards.

If the visual assessment reveals deteriorated paint, the award subrecipient should notify the owner of the unit with inspection results. The owner is required to have the deteriorated paint tested for lead based paint or to assume the presence of lead based paint is its stabilization activities.

Award subrecipient staff should instruct the owner to conduct paint stabilization before the unit is occupied to control possible lead-based paint hazards.

Owners must correct the deteriorated paint identified during the visual assessment process using safe work practices in order to participate in the long-term rental assistance program.

#### 7) *Lead Hazards Reduction*

At the completion of any paint stabilization, the owner must sign the Lead Certification 8.11 of the HQS inspection form or a form with equivalent language. This section instructs the owner to provide certification to the administering agency if any correction of defective paint occurs at the unit.

- Training/Supervision. Workers performing paint stabilization must be trained in accordance with OSHA regulations at 29 CFR 1926.59. In addition, they must meet one of the following:
  - (a) Supervision by a certified abatement supervisor;
  - (b) Successful completion of an accredited abatement supervisor course in accordance with 40 CFR 745.225;

- (c) Successful completion of an accredited lead-based paint abatement worker course in accordance with 40 CFR 745.225;
- (d) Successful completion of the Lead-Based Paint Maintenance Training Program developed by the National Environmental Training Association for EPA and HUD;
- (e) Successful completion of the Remodeler's and Renovator's Lead-Based Paint Training Program developed by HUD and the National Association of the Remodeling Industry; or
- (f) Successful completion of an equivalent course approved by HUD.

#### 8) Safe Work Practices

- (a) The owner must use safe work practices when conducting paint stabilization. Safe work practices include safe work methods, occupant protection, worksite preparation, and cleanup.
- (b) Occupant Protection. Work should be performed in a vacant unit if possible. If residents must remain inside the dwelling during work, a barrier to the room where stabilization is taking place should be erected and residents should not be allowed to enter the work area until clearance has been completed.
- (c) Worksite Preparation. The worksite should be contained using plastic sheeting extending five feet beyond the perimeter of the treated area in all directions on the floor. Ventilation systems should be turned off until work is complete.
- (d) Cleanup. After paint stabilization is complete, the worksite should be cleaned to remove all lead-based paint dust. Cleanup must be accomplished by wet washing surfaces with a lead specific detergent or its equivalent. Other cleaning devices, such as vacuum cleaners with HEPA filters, can be used during cleanup. Waste and debris must be disposed of in sealed containers in accordance with Federal and state waste disposal requirements. Use of a HEPA vacuum is recommended.

#### 9) Exemptions to Safe Work Practices.

Safe work practices are not required when treated areas are tested and found to be free of lead-based paint, or if the surface area being treated is smaller than a total of 2 square feet per room or 10 percent of the total surface area of interior components, such as window sills.

- 10) Occupant Protection. Property owners should protect residents and their personal belongings from exposure to lead-contaminated dust and debris during paint stabilization.
  - (a) Personal belongings should be relocated to an area outside the treatment area or covered with an impermeable covering with all seams and edges taped shut.
  - (b) Residents may need to be temporarily relocated during treatment if they are exposed to lead-based paint hazards.
  - (c) Worksite Preparation. The award subrecipient should instruct the owner to control the spread of dust and debris at the worksite. This preparation should ensure that leaded dust, lead-based paint chips and other debris are contained within the

worksite until they can be safely removed. Protective measures include sealing off vents and doorways with poly sheeting; covering floors and furniture with poly sheeting and wrapping debris in poly before disposal.

11) Cleanup. After paint stabilization is complete, the worksite should be cleaned to remove lead-based paint dust. Cleanup must be accomplished by wet washing surfaces a lead-specific detergent or its equivalent. Vacuum cleaners with HEPA filters should be used during cleanup. Waste and debris must be disposed in sealed containers in accordance with Federal and state disposal requirements.

*12) Clearance*

- Clearance must take place following paint stabilization. Clearance helps to ensure that lead-based paint hazards are controlled and the unit is safe for habitation.
- Paint stabilization and other lead hazard reduction efforts are considered complete when clearance is conducted. Clearance must be performed to ensure that lead-based paint hazards have been controlled.
  - (a) Clearance consists of a visual examination, collection of dust samples, and laboratory analysis of the samples for lead.
  - (b) Clearance is performed after lead hazard reduction and clean-up are complete.
  - (c) Dwellings must meet the following clearance standards.

	Floors ( $\mu\text{g}/\text{ft}^2$ )	Interior Window Sills ( $\mu\text{g},\text{ft}^2$ )	Window Troughs ( $\mu\text{g}/\text{ft}^2$ )
Lead in Dust (as measured by a dust wipe sample)	40	250	800

- Clearance Examiner. The administering agency is responsible for hiring a certified professional to conduct the clearance. This professional may be a certified risk assessor, lead-based paint inspector, or clearance technician. The clearance examiner must be independent from the individual or entity who conducted the paint stabilization or other lead hazard reduction, unless they are employees of the administering agency. Note: If agency employees are used, the same individual who conducted paint stabilization is not permitted to conduct clearance.
- Clearance Report. Prior to closing, and within 15 calendar days of the completion of the lead hazard reduction activities, the tenant must be notified of the clearance examination. The administering agency should ensure that the report is prepared and sent to the tenant. This report should include:
  - (a) Beginning and ending dates of the lead hazard reduction activities.
  - (b) Name and address of the firm conducting lead hazard reduction activities and the name of the supervisor assigned to the lead hazard reduction activities.

- (c) The name, address and signature of each person conducting clearance sampling, the date of the clearance testing, and the certification number for each certified risk assessor or inspector who conducted sampling.
  - (d) The results of clearance testing and the name of each laboratory that conducted the analyses and the identification number of the laboratory.
  - (e) A detailed written description of the lead hazard reduction activities including methods used, location of rooms where activity occurred, and any suggested monitoring.
- **Notify Tenants.** The owner must provide a notice to tenants describing the results of the clearance examination. The award subrecipient should instruct the owner to notify tenants of clearance results.
  - **Staff Training.** As a result of the new cleanup and clearance requirements, the administering agency will need to evaluate their program design and incorporate these new requirements.
    - (a) All program staff should have a basic understanding of the proper clearance procedures;
    - (b) Staff conducting the clearance examination must complete one of the acceptable training courses listed under paint stabilization; and
    - (c) Program staff should understand the components of the clearance report and understand the procedures for notifying the buyer of the results.

## **Chapter10**

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### **PROCUREMENT PROCEDURES**

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth in 2 CFR 200 establishes standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment. The regulations include:

- Standards that prohibit conflicts of interest;
- Procedures for open competition with consistent technical solicitations;
- Affirmative efforts to hire minority- and women-owned enterprises;
- Maintenance of selection documentation;
- Contract administration system that provides sufficient monitoring.

The guidelines on procurement are summarized as follows:

- Subrecipients are allowed to use their own procurement procedures as long as those procedures conform to the provisions of the regulations;
- Subrecipients must maintain a system to handle disputes, protests, and other matters arising out of its contracts; maintain a code of conduct to prevent conflicts of interest (personal,

financial, and organizational); and use solicitations which are clear and accurately describe the materials, products, or services being procured

- Subrecipients must use some form of cost or price analysis in connection with each of its procurements. They must be able to justify procurements awarded on a non-competitive basis and justify the awarding of procurements by bid on the basis of other than the lowest bid.
- Subrecipients must initiate positive efforts to use small and minority-owned businesses to the maximum extent possible; include all applicable contract provisions in contracts; and not use the cost-plus-percentage of cost contracts.
- If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- The subrecipient's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

## Chapter 11

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# Region 12 Coordinated Entry



In 2009, the United States Department of Housing and Urban Development (HUD) instituted a rule that organizations receiving federal assistance to address homelessness must implement a coordinated assessment system for the delivery of housing and homeless services.

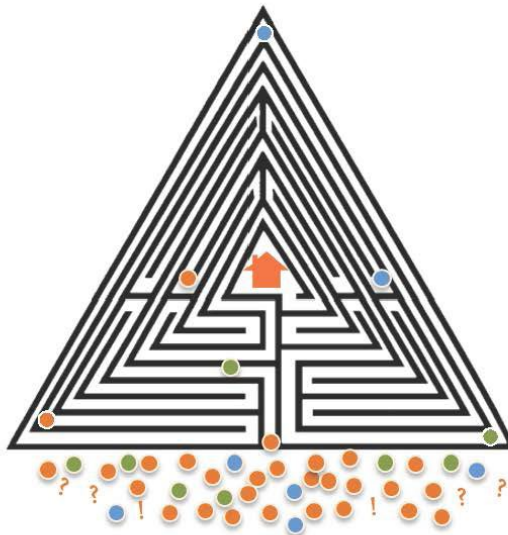
HUD said Coordinated Assessment was a new way to help people **move through the homeless services system faster, reduce new entries** into homelessness, and **improve data collection** and quality for homeless populations and services.

The Aurora Coordinated Entry Assessment Team (Street Outreach) will conduct an assessment of the individual using a standardized form. Currently they are using the VI-SPDAT as part of the Indiana Balance of State CoC. This information will be used to match the person with the most appropriate resources and identify the best path out of homelessness. Aurora is the lead agency for administration of coordinated entry with the assistance of ECHO Housing Corporation. Implementation of Coordinated Entry will help us maximize the use of scarce resources including employees, public services, and housing.

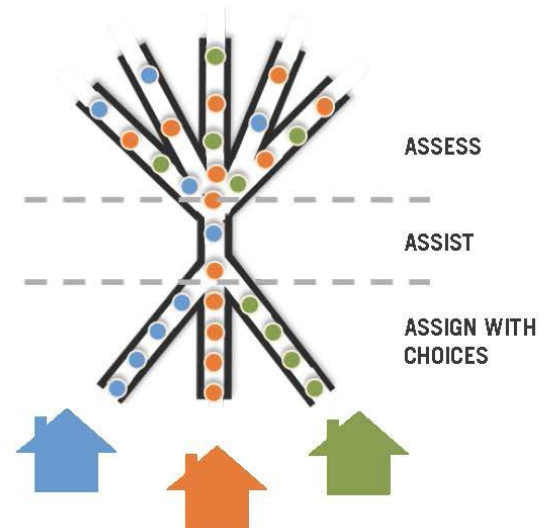
CES=Coordinated Entry System

# A SIMPLER, AND MORE EFFECTIVE WAY

## WITHOUT CES



## WITH CES



## Coordinated Entry FAQ

### What is Coordinated Entry?

A coordinated entry system (CES) aligns all homeless service providers in a centralized process that seeks to deliver better client/program matches.

### Is Coordinated Entry active today?

Yes, Region 12 launched Phase I of our CES on July 1, 2015. Presently, the CES is assigning placements in Permanent Supportive Housing only. We anticipate bringing other systems, such as Transitional Housing and Rapid Re-housing programs, only later this year during Phase II of implementation.



**Will Coordinated Entry affect me?**

Yes, HUD has mandated that all communities receiving CoC funds implement a CES. Within the coming 18-24 months, we anticipate that all homeless services will be accessed via the CES.

**How does Coordinated Entry work?**

All potential participants are assessed using a standardized assessment tool, developed by the National Alliance to End Homelessness, to produce a range of scores that seek to rank households based on vulnerability and barriers to housing.

**How can I refer my client to be assessed?**

Simply complete the "Request for Assessment" form and email to: [region12.ces@gmail.com](mailto:region12.ces@gmail.com)

**How long will it take after completed the "Request for Assessment" form before my client is assessed?**

This will vary based on the specifics of the individual you are referring. Upon receiving the Request for Assessment form, the Coordinated Entry Task Force will conduct a review of that participant's HMIS history. That information, along with current program openings, will help dictate how these requests are prioritized.

**I would like to follow-up on a client I previously requested an assessment on, how can I do this?**

For this, or any other questions related to the Coordinated Entry System, you can contact the CE Task Force at: [region12.ces@gmail.com](mailto:region12.ces@gmail.com)

## Chapter 12

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### STANDARDS OF CARE

**(This is the form used for Standards of Care monitoring.)**

**Homeless Services Council of Southwestern Indiana**

**Agency:** \_\_\_\_\_

#### **Evaluation Scores:**

**4** = *Exceptional adherence to standards of care indicators; Standards of Care met*

**3** = *Satisfactory adherence to standards of care indicators; Standards of Care met*

**2** = *Most standards of care indicators met, but room for improvement; Standards of Care met with reservations from the Evaluation Committee*

**1** = *Standards of Care not met*

#### **Administration, Management and Coordination**

*All involved organizations follow standard and required administrative and management practices, and coordinate their activities in order to ensure the best outcomes for tenants.*

\_\_\_\_\_ Organization has financial audit performed on a regular basis (usually, once per year)

\_\_\_\_\_ Organizational and program policies and procedures are reviewed and updated at least

annually and include detailed job descriptions of program personnel

\_\_\_\_\_ Organization allows program audit narrative (conducted by HUD) to be reviewed by the

Standards of Care Committee

\_\_\_\_\_ Overall section score

#### **Physical Environment**

*The design, appearance, physical integrity and maintenance of the housing units provide an*

*environment that is attractive, sustainable, functional, appropriate for the surrounding community and conducive to tenants' stability.*

\_\_\_\_\_ Facility has a reasonable "home-like" appearance both physically and environmentally—

residential appearance both internally and externally; scale, appearance, design and quality are

consistent with the neighborhood and meet (or exceed) community standards

\_\_\_\_\_ Common spaces are clean and orderly, and adequate for the number of residents

\_\_\_\_\_ The building's safety and security features are up to code and adequate for the facilities

needs

\_\_\_\_\_ Residences/rooms/sleeping quarters meet Housing Quality Standards

\_\_\_\_\_ Overall section score

#### **Access to Housing Services**

*Initial and continued access to the housing opportunities and supportive services is not restricted*

*by unnecessary criteria, rules, service requirements or other barriers.*

\_\_\_\_\_ Organization is located near a bus route (within .5 miles of facility)

\_\_\_\_\_ Program has adopted the “Housing First” philosophy of care, thereby reducing barriers to

program entry indicated by an average time from application to placement of 21 or less days

\_\_\_\_\_ Organization has adequate access to program service linkages (involvement on HSC and

relevant committees)

\_\_\_\_\_ Overall section score

### **Supportive Services Design and Delivery**

*The design and delivery of supportive services facilitate access to a comprehensive array of*

*services, are tenant-focused, effectively address tenants’ needs and foster tenants’ housing*

*stability and independence.*

\_\_\_\_\_ Organization offers comprehensive services or provides referrals to wrap-around services

for clientele

\_\_\_\_\_ Organization abides by tenant-driven services philosophy

\_\_\_\_\_ Organization has adequate staffing and receive appropriate supervision

\_\_\_\_\_ Staff and supervisors have access to service partners and linkages to care

\_\_\_\_\_ Overall section score

### **Property and Asset Management**

*Property management activities support the mission and goals of the housing, and foster tenants’*

*housing stability and independence, and appropriate asset management strategies sustain the*

*physical and financial viability of the housing asset.*

\_\_\_\_\_ Property management staff has a collaborative relationship with supportive services

(whether internal or external) and is aware of the policies and philosophy of the service staff

\_\_\_\_\_ Property management staff effectively communicates with tenants/clients

\_\_\_\_\_ Property management staff keeps residences in compliance with Fair Housing Standards

\_\_\_\_\_ Overall section score

### **Client/Tenant Rights, Input and Leadership**

*Tenant rights are protected within consistently-enforced policies and procedures, tenants are*

*provided with meaningful input and leadership opportunities and staff-tenant relationships are*

*characterized by respect and trust.*

\_\_\_\_\_ Leases are current and kept in clients' confidential file; policies/rules are posted in a conspicuous place

\_\_\_\_\_ Organization has a grievance procedure and that procedure is posted in a conspicuous place; staff is aware of the policy

\_\_\_\_\_ Organization has a confidentiality procedure and that procedure is posted in a conspicuous place; staff is aware of the policy

\_\_\_\_\_ Organization's policies center around providing client-driven services, meaning that clients are provided opportunities for education, input and feedback regarding services rendered

\_\_\_\_\_ Client sensitivity training is available and implemented with all staff and volunteers

\_\_\_\_\_ Overall section score

### **Data, Documentation and Evaluation**

*All involved organizations reliable capture accurate and meaningful data regarding the effectiveness, efficiency and outcomes of their activities and use this data to facilitate and improve the performance of those activities on an ongoing basis.*

\_\_\_\_\_ Organization provides monthly updates to Standards of Care Committee Co-Chairs on or prior to the due date (15<sup>th</sup> of the month)

\_\_\_\_\_ Organization allows for the development and training of program staff

\_\_\_\_\_ Organization has a representative involved in at least once HSC committee

\_\_\_\_\_ Client input is utilized in a useful way and feedback is provided to tenants in a timely manner

\_\_\_\_\_ Utilization of HMIS or equivalent database (grade based on intensity of use)

\_\_\_\_\_ Most recent Data Quality Report Card grade

\_\_\_\_\_ Overall section score

### **SWOT Analysis of Agency**

**Strengths: Weaknesses/Limitations:**

**Opportunities: Threats:**

**Comments:**

### **Courtesy of Siebert Consultants:**

#### **SWOT Analysis**

To move from where you are today to where you want to go, you have to determine your strategic position. The SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis helps you look critically at your organization. The four quadrants of the SWOT define your strategic position right now. Later we will use this information to guide the objectives and goals in your strategic plan.

SWOT Analysis is a powerful technique for understanding your Strengths and Weaknesses, and for looking at the Opportunities and Threats you face.

### ***How to Use this Tool***

To carry out the SWOT Analysis, see the attached worksheet, and write down answers to the following questions in each area.

#### **INTERNAL ASSESMENT**

**Strengths:** The internal assessment examines strengths that exist within your organization. Strengths encompass everything your organization does well. This includes capabilities, skills, and resources you can leverage and draw upon to execute plans and actions within your organization. Strengths are only meaningful when they assist an organization in meeting customer/constituent needs.

- What advantages does your Organization have?
- What assets or resources do we have?
- What would Clients say are our strengths?
- What do you do better than anyone else?
- What unique or lowest-cost resources do you have access to?
- What do people in your market see as your strengths?
- What factors mean that you "have clients seek your services?"

Consider this from an internal perspective, and from the point of view of your Clients in your market. And be realistic: It's far too easy to fall prey to "not invented here syndrome". Also, if you are having any difficulty with this, try writing down a list of your characteristics. Some of these will hopefully be strengths!

In looking at your strengths, think about them in relation to your competitors – for example, if all your competitors provide high quality services, then a high quality services is not strength in the market, it is a necessity.

**Weaknesses:** The internal assessment examines weaknesses that exist within your organization. A weakness is something your organization lacks or does poorly in comparison to others, or a condition that puts it at a disadvantage. Weaknesses encompass everything that is holding your organization back from achieving your goals or serving your Clients/Constituents.

- What could you improve?
- What should you avoid?

- What are people in your market likely to see as weaknesses?
- What factors cause potential clients to go elsewhere?

Again, consider this from an internal and external basis: Do other people seem to perceive weaknesses that you do not see? Are your competitors doing any better than you? It is best to be realistic now, and face any unpleasant truths as soon as possible.

Again use the worksheet, and write down answers to the above questions relating to Weaknesses.

## **EXTERNAL ASSESMENTS**

**Opportunities** The external assessment examines opportunities that exist in your area. Opportunities are situations that exist but must be acted on if your organization is to benefit from them. Opportunities most relevant to your organization are those that offer important avenues for growth, have the most potential for competitive development, and those that match up well with the financial and resource capabilities that your organization already possesses or can acquire.

- Where are the good opportunities facing you?
- What are the interesting trends you are aware of?

Useful opportunities can come from such things as:

- Changes in technology and markets on both a broad and narrow scale
- Changes in government policy related to your field
- Changes in social patterns, population profiles, lifestyle changes, etc.
- Local Events

A useful approach to looking at opportunities is to look at your strengths and ask yourself whether these open up any opportunities. Alternatively, look at your weaknesses and ask yourself whether you could open up opportunities by eliminating them.

Again use the worksheet, and write down answers to the above questions relating to Opportunities.

**Threats:** The external assessment examines threats that exist in the marketplace. Threats exist independent from your organization. Threats refer to external conditions or barriers that may prevent your organization from reaching its objectives. Your organization should recognize these threats and try to minimize them.

- What obstacles do you face?
- What is your competition doing?
- Are the requirements for your services changing?

- Is changing technology threatening your position?
- Do you have bad debt or cash-flow problems?
- Could any of your weaknesses seriously threaten your organization?

Again use the worksheet, and write down answers to the above questions relating to Threats.

SWOT Analysis is a simple but powerful framework for analyzing your Organization's Strengths and Weaknesses, and the Opportunities and Threats you face. This helps you to focus on your strengths, minimize threats, and take the greatest possible advantage of opportunities available to you.

Carrying out this analysis will often be illuminating – both in terms of pointing out what needs to be done, and in putting problems into perspective.

## **Chapter 13**

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### **REFERENCE MATERIALS & RESOURCES**

<a href="http://www.in.gov/ihcda/">http://www.in.gov/ihcda/</a>	Indiana Housing & Community Development Authority
<a href="http://www.in.gov/myihcda/2357.htm#H">http://www.in.gov/myihcda/2357.htm#H</a>	IHCDA-Partner website-ESG specific
<a href="http://www.hudhre.info/index.cfm?do=viewResource&amp;ResourceID=4517">http://www.hudhre.info/index.cfm?do=viewResource&amp;ResourceID=4517</a>	ESG Program Interim Regulations
<a href="http://www.access.gpo.gov/nara/cfr/cfr-table-search.html">http://www.access.gpo.gov/nara/cfr/cfr-table-search.html</a>	Code of Federal Regulations
<a href="http://www.access.gpo.gov/nara/cfr/waisidx_04/24cfr576_04.html">http://www.access.gpo.gov/nara/cfr/waisidx_04/24cfr576_04.html</a>	ESG Regulations
<a href="http://www.indianahousingoptions.org/home.asp">http://www.indianahousingoptions.org/home.asp</a>	Indiana Housing Opportunity Planner & Evaluator
<a href="http://www.hud.gov">http://www.hud.gov</a>	Official HUD site
<a href="http://www.hudexchange.gov">http://www.hudexchange.gov</a>	HUD Exchange
<a href="http://www.endhomelessness.org">http://www.endhomelessness.org</a>	National Alliance to End Homelessness
<a href="http://www.hud.gov/offices/fheo/index.cfm">http://www.hud.gov/offices/fheo/index.cfm</a>	HUD Fair Housing Equal Opportunity Link
<a href="http://www.indianahousingnow.org">http://www.indianahousingnow.org</a>	Indiana Housing Now Search Engine

14.231

Emergency Solutions Grant's Code of Federal  
Domestic Assistance (CFDA) Number

<http://www.hud.gov/offices/fheo/promotingfh/928-1.pdf>

Equal Housing Opportunity/ Fair Housing Poster