

# HOME-ARP PROGRAM MANUAL

Washington County

Office of Community Development

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# Overview / Introduction to HOME-ARP

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law. This bill provided \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses.

\$5 billion in ARP funds were appropriated to be administered through the Housing and Urban Development Department's (HUD) HOME program, and were allocated via a <u>formula</u> to local governments, insular areas, and consortia of units of general local government that qualified for an allocation of HOME funds in Fiscal Year (FY) 2021. This funding is to be used to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations by providing housing, rental assistance, supportive services, and increase housing stability across the country.

Washington County received \$6,101,728 in HOME-ARP funding from this allocation. These funds are administered by the County's Office of Community Development (OCD)

On September 13, 2021, HUD issued Notice CPD-21-10: Requirements for the Use of Funds contained in the HOME-American Rescue Plan Program (The Notice). The Notice outlines the approved processes, uses, and requirements for Participating Jurisdictions (PJs) utilizing HOME-ARP funding. This program manual summarizes and interprets those requirements contained within the Notice, the Waivers and Alternative Requirements For Implementation of the HOME American Rescue Plan Program ("the waivers") as well as additional support and guidance provided by HUD. Additionally, Washington County's Office of Community Development (OCD) may update this manual in the future with additional subrecipient requirements to ensure proper utilization and documentation of HOME-ARP funding.

# Allocation Plan & Budget

In 2022, Washington County Consortium produced the HOME-American Rescue Plan Allocation Plan For Washington County and the Cities of Beaverton, Hillsboro, & Tigard, containing a description of agency and service provider consultation, public participation comments, needs assessment, gaps analysis, and a description of how the County intended to distribute HOME-ARP funds. HUD approved the Washington County Consortium's HOME-ARP Allocation Plan as a Substantial Amendment to the FY2021 Action Plan on September 1, 2022. This plan was amended in November 2024 to add population preferences not previously described in the plan.

Activity	Funding Amount	Portion of Total	Statutory Limit
Non-Congregate Shelter Acquisition / Rehab	\$4,076,296	66.8%	
Supportive Services	\$500,000	8.2%	
Non-Profit Operating Expenses	\$305,086.40	5%	5%
Non-Profit Capacity Building	\$305,086.40	5%	5%
Administration and Planning	\$915,259.20	15%	15%
Total HOME ARP Allocation	\$6,101,728		

This allocation was determined based on the needs assessment and gaps analysis as well as consultations held with community-based organizations as documented in the allocation plan. One of the biggest gaps identified was a lack of year-round shelter in Washington County. During the 2022 Point-in-time count (PIT), there were 227 unsheltered individuals and 496 individuals in emergency shelter. Many of the emergency shelters in Washington County are winter shelters which were in operation during the PIT count but do not operate year-round, so the number of unsheltered individuals over the course of the year could be much higher. People experiencing a housing crisis or fleeing an unsafe situation need to find a safe place to stay quickly.

Year-round, non-congregate shelter can help fill this gap. Washington County Supportive Housing Services Program, administered by the County's Department of Housing Services has funding to support ongoing operating costs of non-congregate shelter. Allocating 66.8% of the HOME-ARP funds for non-congregate shelter acquisition and rehabilitation was seen as an opportunity to provide stable shelter and access to critical services to those who are chronically homeless and at-risk of homelessness. 5% of the HOME-ARP funds were allocated for non-profit operating expenses, with an additional 5% allocated for non-profit capacity building to ensure sub-recipients can successfully carry out the HOME-ARP activities once contracted.

8.2% was allocated towards supportive services to provide homeless prevention services in the form of financial assistance for payment of rental & utility arrears, rental assistance, and utility assistance to alleviate the number of households that may be evicted because of past due rent. 15% was allocated to Administration and Planning to cover Washington County's costs to administer the program.

# General Program Requirements

The American Rescue Plan provides funds for homelessness and supportive services assistance under the HOME statute of Title II of NAHA (42 U.S.C. 12721 et seq.) and authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of NAHA or regulation for the administration of the HOME-ARP program, except requirements related to fair housing, civil rights, nondiscrimination, labor standards, and the environment, upon a finding that the waiver 3 or alternative requirement is necessary to expedite or facilitate the use of HOME-ARP funds. Pursuant to ARP, the per-unit cost limits (42 U.S.C. 12742(e)), commitment requirements (42 U.S.C. 12748(g)), matching requirements (42 U.S.C.

<u>12750</u>), and set-aside for housing developed, sponsored, or owned by community housing development organizations (CHDOs) (<u>42 U.S.C. 12771</u>) in NAHA do not apply to HOME-ARP funds.

The Notice describes the requirements applicable to a PJ's use of HOME-ARP funds. Except as described in ARP's text, and The Notice, HOME statutory and regulatory provisions apply to a PJ's use of HOME-ARP funds, which are described in the <u>Code of Federal Regulations Title 24</u>, part 92. The waivers document describes alternative requirements to the HOME program standards imposed on PJs for the use of HOME-ARP funds and is included in any reference to "the Notice."

# **Qualifying Populations**

This funding will be used to address challenges faced by individuals and families experiencing homeless and housing instability, which are complex and individually unique. The Notice outlines the specific qualifying populations who are eligible to receive assistance through the HOME-ARP activities. In plain terms, those who qualify are people experiencing homelessness who do not have a fixed place to reside each night, are in immediate danger of losing their housing, or are fleeing domestic violence or other dangerous situations. The Notice defines these "Qualifying Populations" specifically as the following\*:

- 1. Homeless as defined in 24 CFR 91.5
- 2. At risk of homelessness as defined in 24 CFR 91.5.
- 3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking as <u>defined by HUD</u>.
- 4. Other populations where providing supportive services or assistance under section <u>212(a) of NAHA (42 U.S.C 12742(a))</u> would:
  - prevent a family's homelessness; or
  - serve those at greatest risk of housing instability:
    - Annual income ≤ 30% of area median income (AMI) and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs) OR
    - Annual income ≤ 50% of AMI and meets one of the conditions of at-risk of homelessness.

## **Preferences**

Washington County will provide access to all Qualifying Populations with a preference for families for its HOME-ARP activities. In consultation with community agencies, the need for shelters for families was identified by numerous agencies. Washington County will provide access to all four qualifying populations but will allow recipients to provide a selection preference for families who meet the criteria of one of the four qualifying populations. This preference is consistent with Washington County needs assessment in the HOME-ARP Allocation Plan.

<sup>\*</sup>and Veterans and families including veteran member that meet one of the preceding criteria

## Referral Methods

Coordinated Entry will be used to refer eligible individuals and households and will be expanded to include all four qualifying populations or will be supplemented by other referral agencies to permit applications from all four qualifying populations. Eligible individuals and households will be referred on a first come-first-serve basis, with a preference to subrecipients serving families. All preference or prioritization methods must be approved by Washington County's OCD.

Subrecipients may limit admission to or provide a preference for HOME-ARP Non-Congregate Shelter projects to households who need the specialized supportive services that are provided through the project. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability. All subrecipients must follow all applicable fair housing, civil rights, and non-discrimination requirements, including but not limited to those listed in 24 CFR 5.105(a). This also includes and is not limited to the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.

## **Duplication of Services**

HOME-ARP subrecipients are responsible for ensuring that clients receiving eligible supportive services funded through HOME-ARP are not simultaneously receiving or approved to receive the same services from another program or provider. The subrecipient organization must use the Homeless Management Information System (HMIS) database in coordination with other local service providers to verify this information.

# Eligible Activities

The Washington County HOME-ARP Allocation Plan outlines eligible activities:

- Non-Congregate Shelter Acquisition and/or renovation of facilities for use as a shelter.
- Supportive Services Homeless prevention services in the form of rental & utility back payments and assistance.
- Non-Profit Operating General operating funds for non-profits who will perform either of the above HOME-ARP activities.
- Non-Profit Capacity Building Funding for new positions which support either of the above HOME-ARP activities.
- Administration and Planning Washington County's costs incurred through administration of the HOME-ARP program.

This section further explains the eligible costs for each activity in alignment with the Allocation Plan. For any expenditures incurred by subrecipient grantees to be reimbursed by Washington County OCD, the subrecipient must have an active and executed contract with OCD outlining all activities to be completed. Those expenditures must follow the restrictions contained within this guide, as well as any additional requirements outline in the Notice. More information can be found in the Notice, and on <a href="https://example.com/thesample.com/

# Non-Congregate Shelter (NCS)

#### General Requirements

Projects using HOME-ARP funding for the acquisition, rehabilitation, or new construction of NCS units are subject to the following restricted use periods, beginning at projection completion, to be enforced with an executed trust deed and promissory note:

Acquisition Only: 10 years

Rehabilitation: 10 years

New Construction: 15 years

HOME-ARP NCS units may only be occupied by individuals or families that meet one or more of the qualifying population categories as defined in the Notice. These occupants must be referred into the shelter through coordinated entry, with preference given to families. No individual or family may be denied admission to or removed from a HOME-ARP NCS unit on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking if the individual or family meets the criteria of one of the qualifying populations. Additionally, subrecipients must comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) when applying preferences through its referral methods.

All HOME-ARP NCS projects must be completed with 4 years from the date of the last signature on the written agreement between Washington County and the subrecipient. HOME-ARP NCS rehabilitation projects must begin operating as active shelters within 6 months after project completion.

Project completion for HOME-ARP NCS means:

- All necessary title transfer requirements and construction work has been performed.
- The project complies with the requirements of the Notice, including the HOME-ARP NCS property standards as evidenced by a final inspection conducted by OCD staff.
- The project is actively operating as a HOME-ARP NCS

- Final drawdown of HOME-ARP funds has been disbursed by OCD.
- Project completion information is entered into HUD's Integrated Disbursement Information
   System (IDIS). (Note: this step is performed by OCD)

#### Eligible Costs: Non-Congregate Shelter

HOME-ARP eligible costs include:

- a. Acquisition Costs: Costs to acquire improved or unimproved real property.
- b. Demolition Costs: Costs of demolishing existing structures for the purpose of developing HOME-ARP NCS.
- c. Development Hard Costs: Costs identified in <u>24 CFR 92.206(a)</u> to rehabilitate or construct HOME-ARP NCS units, except costs must be for meeting the physical standards established in Section VI.E.7 of the Notice.
- d. Site Improvements: Costs to make improvements to the project site, including installation of utilities or utility connections, and the construction or rehabilitation of laundry, community facilities, on-site management or supportive service offices.
- e. Related Soft Costs: Reasonable and necessary costs incurred by the grantee (subrecipient) associated with the financing, acquisition, and development of HOME-ARP NCS projects, including costs identified in 24 CFR 92.206(d) with the following exceptions:
  - i. Costs to provide information services such as affirmative marketing to prospective homeowners and tenants are not eligible.
  - ii. Costs of funding an initial operating deficit reserve are not eligible.
  - iii. Costs of project-specific assistance to community housing development organizations, including technical assistance and site control loans or seed money loans as specified in 24 CFR 92.301 are not eligible.
- f. Replacement Reserve: Costs to capitalize a replacement reserve to pay the reasonable and necessary costs of replacing major systems and their components whose useful life will end during the restricted use period. Major systems include structural support, roofing, cladding, and weatherproofing, plumbing, electrical and HVAC. The costs of replacing major systems must be determined through a Capital Needs Assessment or documented in writing after an inspection by the grantee to assess the remaining useful life of major systems expected upon completion of the HOME-ARP NCS project. The costs of a replacement reserve must be included in the project budget in the written agreement along with a list of major systems to be replaced with the reserve and projected replacement schedule during the restricted use period (i.e., reserve for replacement analysis).

#### Prohibited Costs: NCS

HOME-ARP funds may not be used for the following:

- a. Any costs associated with the operating of a HOME-ARP NCS project.
- b. Provision of additional HOME-ARP investment in a HOME-ARP NCS project during the restricted use period, except that additional HOME-ARP funds can be invested in the project up to one year after project completion in IDIS for eligible costs.
- c. Costs associated with the conversion of HOME-ARP NCS units into rental housing units.
- d. As non-federal matching contributions required under any other federal program.
- e. Provision of assistance under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g).
- f. Assistance to eligible low-income housing under Prepayment of Low-Income Housing Mortgages (24 CFR part 248).
- g. Payments for the acquisition of property owned by Washington County, except for property acquired by Washington County with HOME-ARP NCS funds, or property acquired in anticipation of carrying out a HOME-ARP NCS project.
- h. Payment of delinquent taxes, fees, or charges on properties to be assisted with HOME-ARP NCS funds.
- i. Rehabilitation costs for any NCS units which will not be occupied by a member or members of a qualifying population.
- j. Payments for any cost that is not eligible under the Notice.

#### Property and Habitability Standards.

HOME-ARP NCS projects must meet the minimum HOME-ARP property standards prior to occupancy and the HOME-ARP NCS ongoing property standards throughout the restricted use period as described in the Notice. Washington County will make the determination that construction contracts and documents describe the work to be completed in adequate detail to establish a basis for inspection to determine that all work was completed to contracted specifications and that the project met the HOME-ARP NCS property standards.

All HOME-ARP NCS units and common areas must meet all applicable State and local codes, ordinances, and requirements and the applicable provisions of HUD's Lead Safe Housing Rules at <u>24 CFR Part 35</u>. In addition, all HOME-ARP NCS projects must meet the following minimum safety, sanitation, accessibility, and privacy standards:

- Must be structurally sound to protect occupants from the elements and not pose any threat to health and safety of the occupants.
- Must be accessible in accordance with section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and implementing regulations at 24 CFR part 35, all as applicable.
- Must provide each individual or family with an acceptable, individual room to sleep which includes adequate space and security for themselves and their belongings.
- Must have a natural or mechanical means of ventilation. The interior air must be free of
  pollutants at a level that might threaten or harm the health of occupants.
- Must have a water supply free of contamination.
- Must have in-unit sanitary facilities that are in proper operating condition and are adequate for personal cleanliness and the disposal of human waste.
- Must provide necessary heating/cooling facilities in proper operating condition.
- Must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances.
- Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Must provide one working smoke detector and one working carbon monoxide detector in each
  unit. All smoke and carbon monoxide detectors and alarm systems must be designed for
  hearing-impaired residents. All public areas of the shelter must have at least one working smoke
  detector and one carbon monoxide detector. There must also be a second means of exiting the
  building in the event of fire or another emergency.

Washington County OCD will inspect HOME-ARP NCS projects annually throughout the restricted use period of the project. When deficiencies are identified, a follow-up inspection will occur within 6 months, except in the case of non-hazardous deficiency corrections which can be verified through documentation submitted to OCD, such as work orders or paid invoices, in lieu of reinspection. If lifethreatening deficiencies exist, the owner or operator of the HOME-ARP NCS must correct such deficiencies immediately. In such instances, OCD will re-inspect to verify the deficiency has been corrected within 14 days.

## **Supportive Services**

HOME-ARP funds may be used to provide a range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities. Washington County has prioritized this funding to provide homeless prevention services in the form of financial assistance for payment of rental arrears, utility arrears, and rental & utility assistance to alleviate the number of households that may be evicted because of past due rent or utility payments.

The following utilities are eligible for assistance, either as an arrear or ongoing assistance:

- Gas
- Electric
- Water
- Sewer

Ongoing financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources. Financial assistance also cannot be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601 et seq.) and its implementing regulations at 49 CFR part 24, or Section 104(d) of the Housing and Community Development Act of 1974 (42 USC 5304(d)) and its implementing regulations at 24 CFR part 42, during the period of time covered by the replacement housing payments.

#### **Rental Arrears**

HOME-ARP funds may be used for a one-time payment for up to 6 months of rent in arrears, including any late fees or charges directly related to those arrears, if necessary for the household to maintain their existing housing or, for those without housing, if necessary to remove a demonstrated barrier to obtaining housing. Fees and charges may include late fees, returned payment charges, insufficient or nonsufficient funds fees, credit card processing fees, month-to-month fees, and any other fees that can reasonably be explained as resulting from a lack of financial resources on the part of a program participant. Arrears may not be paid to a program participant if said arrears will go towards a rental which was already receiving rental assistance or if the participant was living in housing provided with ongoing assistance such as project based rental assistance or operating subsidies.

#### Utility Arrears & Assistance

HOME-ARP funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service, within any 3-year period. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. For example, if a program participant utilizes the full 6 months of utility arrears, they may receive an additional 18 months of utility assistance. Program participant must have an active lease on file for the same address as the utility payment, a copy of which is to be provided to OCD on submission of a reimbursement voucher request.

#### Rental Assistance

Home-ARP funds may be used to provide program participants with short-term or medium-term financial assistance for rental payments provided that the total financial assistance, including any rental arrears provided, does not exceed 24 months of rental payments over any 3-year period. Subrecipient grantees may provide this short term (3 months) or medium term (longer than 3 months but less than 24 months) assistance to any program participant who meets the requirements for a qualifying population.

To provide this assistance, subrecipients must have a financial assistance agreement with the owner or property manager outlining the terms under which rental payments will be provided. Those terms must include requirements for the timeliness of payments, which must include the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The subrecipient is responsible for paying late payment penalties that it incurs with non-HOME-ARP funds. Rental payments can only be provided if the rent does not exceed the <a href="Fair Market Rent">Fair Market Rent</a> established annually by HUD, and if the program participant is not already receiving rental assistance or living in housing provided with ongoing assistance such as project based rental assistance or operating subsidies.

Program participants cannot have received funding through Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and its implementing regulations at 49 CFR part 24, or Section 104(d) of the Housing and Community Development Act of 1974 (42 USC 5304(d)) and its implementing regulations at 24 CFR part 42 during the period of rental assistance received through HOME-ARP.

# Capacity Building & Operating Expenses

Capacity Building and Operating Expenses are reserved for payment of expenses from nonprofit organizations that will carry out activities (Supportive Servies or Non-Congregate Shelter Projects) with HOME-ARP funding. Organizations may be awarded available funding from both the Capacity Building and Operating Expenses allocations, or just one of these categories, so long as that organization will perform an eligible activity with 24 months of the award. This funding is to be awarded through a written agreement which is separate from any agreement providing HOME-ARP funds for non-congregate shelter or supportive services.

Organizations are limited to one \$50,000 award per category, per fiscal year. Total funding awarded for both Capacity Building and Operating Expenses may not exceed \$75,000, per fiscal year. An award in these individual categories or in aggregate may not exceed 50 percent of an organization's total operating expenses for that fiscal year.

Below is a table of example award amounts in this category. These examples are for illustrative purposes only, organizations are not limited to adhere to the exact amounts described in the table so long as the above restrictions are followed.

Category:	Scenario A	Scenario B	Scenario C
Capacity Building	\$50,000	\$20,000	0
Operating Expenses	\$25,000	\$50,000	\$50,000
Total Award:	\$75,000	\$70,000	\$50,000

Example Capacity Building and Operating Expenses Award Amounts

#### Eligible Costs: Operating Expenses

Operating expenses are defined as reasonable and necessary costs of operating the nonprofit organization. These costs include employee salaries, wages and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment, materials, and supplies.

HOME-ARP funds used for operating expenses must be used for the "general operating costs" of the nonprofit organization. These operating costs must not have a particular final cost objective, such as a project or activity, and must not be directly assignable to a HOME-ARP activity or project. For example, HOME-ARP funds for operating expenses may not be used for staffing costs to provide supportive services, but they may be used to pay an employee's salary who performs accounting activities for the entire organization across multiple projects. Costs related to operating a non-congregate shelter (e.g., allocable overhead and staffing costs, insurance, utilities) cannot be paid with HOME-ARP funds.

#### Eligible Costs: Capacity Building Assistance

Capacity building expenses are defined as reasonable and necessary general operating costs that will result in expansion or improvement of an organization's ability to successfully carry out eligible HOME-ARP activities. Eligible costs include salaries for new hires including wages and other employee compensation and benefits; costs related to employee training or other staff development that enhances an employee's skill set and expertise; equipment (e.g., computer software or programs that improve organizational processes), upgrades to materials, and supplies; and contracts for technical assistance or for consultants with expertise related to the HOME-ARP qualifying populations.

# Federal Cross-Cutting Regulations

The requirements in Title 24 of the Code of Federal Regulations, (24 CFR) Subtitle A, Part 92.350 apply to the HOME-ARP program. All programs and projects receiving funding through HOME-ARP are subject to these and additional cross-cutting federal regulations. OCD will monitor subrecipient compliance with these regulations throughout the lifecycle of any project awarded funded.

These additional regulations include the following:

- Affirmative Marketing and Minority Outreach.
- The National Environmental Policy Act of 1968 and related laws.
- Environmental review standards under 24 CFR Part 58.
- Labor Standards and requirements in 24 CFR 92.354 including the Davis-Bacon Act.
- Lead Hazard Control requirements.
- Uniform Relocation Assistance and Real Property Acquisition Policies Act.
- Section 104(d) of the Housing and Community Development Act of 1974.
- HOME Displacement, Relocation and Acquisition Program Requirements.
- Section 3 Economic Opportunities for Low- and Very Low-Income Persons.
- Conflicts of interest requirements as outlined in Notice CPD-21-10.
- Additional HOME-ARP Program relocation related requirements as outlined in Notice CPD-21-10.

For technical assistance in assessing the applicability of these regulations and requirements to an individual program or project, contact OCD.

# Post Award Reporting and Compliance

# Reporting

On a quarterly basis, all HOME-ARP assisted projects must submit a report via ZoomGrants, providing all requested information. Reports are due 15 days after the end of each fiscal quarter. These dates are October 15<sup>th</sup>, January 15<sup>th</sup>, April 15<sup>th</sup>, and July 15<sup>th</sup>.

Subrecipients with funding for NCS projects will provide a narrative update outlining project progress, goals, and activities to be completed in the following quarter.

Subrecipients providing Support Services must maintain household data for all clients assisted with HOME-ARP funds. On a quarterly basis, subrecipients must submit beneficiary data, along with all other requested information via ZoomGrants.

## Voucher Reimbursement Requests

Subrecipients shall submit a Voucher Reimbursement Request via ZoomGrants including copies of substantiating documentation no later than the 15<sup>th</sup> of each month. OCD will review these vouchers, working with subrecipients to ensure all billed items are properly eligible, itemized, and documented before approving all Voucher Reimbursement Requests. The County shall issue payment no later than thirty (30) days after approval of requests.

To receive reimbursement, grant subrecipients must be up to date with all contractually required paperwork and reports.

### Records

Subrecipients must provide substantiating documentation for incurred costs as attachments to submitted vouchers, via email, or as documented within HMIS. At a minimum, the following records must be provided:

- Documents which act as confirmation that all funding utilized from the HOME-ARP program benefited individuals and families within qualifying populations as defined the Notice.
- Evidence that each household qualifying as "at risk of homelessness" meet the requirements outlined in 24 CFR 91.5. The following documents are acceptable as forms of income
  - Income evaluation form contain the minimum requirements specified by HUD and completed by the recipient or subrecipient
  - Source documents for the assets held by the household and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement)
  - To the extent that source documents are unobtainable, a written statement by the
    relevant third party (e.g., employer, government benefits administrator) or the written
    certification by the recipient's or subrecipient's intake staff of the oral verification by the
    relevant third party of the income the household received over the most recent period
    for which representative data is available; or
  - to the extent that source documents and third-party verification are unobtainable, the written certification by the household of the amount of income the household received for the most recent period representative of the income that the household is reasonably expected to receive over the 3-month period following the evaluation.
- For all HOME-ARP Supportive Services projects pursuant to McKinney-Vento or Homeless Prevention Supportive Services:
  - Records, where applicable, demonstrating compliance with the termination of assistance requirement as described in Section VI.D.5 of the Notice.

Additional documents may be requested by OCD to comply with the required documentation outlined in the Notice. Subrecipients must maintain all records related to HOME-ARP projects for a minimum of 5 years from the date of contract execution, or as long as otherwise required by state or federal law.

# Monitoring

The Washington County OCD will monitor subrecipients for compliance with applicable federal requirements, such as accessibility, fair housing, lead-based paint, and Davis-Bacon. In addition, OCD will monitor general management, performance goals, financial management, data collection and reporting, eligibility determinations, nondiscrimination, program outreach, timely reporting, coordination with other programs, and inspection of completed units. Monitoring will consist of both desk and on-site reviews. On-site reviews will occur periodically and include an in-depth review of agency, project and client files. Desk monitoring of voucher submittals will include a review of contractual commitments, financial documentation, determination of cost eligibility, drawdown rates, and outcome/performance measurement review. The primary goals of monitoring programs and projects are to ensure accomplishment of services or projection construction, ensure accountability of public funds, ensure compliance with federal requirements and evaluate project performance during specific time periods.