



Five County Association of Governments Community Action Partnership (FCAOG CAP) Policies

Human Services Council Approved 07/10/2024

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Introduction

This manual specifically provides guidelines to Five County Association of Governments employees in the Community Action Department. Policies specific to the Community Action Department were generally added to meet specific organizational standards of the Community Services Block Grant (CSBG), Social Services Block Grant (SSBG), US Department of Agriculture (USDA) pantry programs, and US Department of Housing and Urban Development (HUD) Continuum of Care (COC) programs. These additional policies have been approved by the Five County Human Services Council, the tripartite board overseeing Community Action staff, volunteers, subgrantees, and programs. The Five County Association of Governments Steering Committee also oversees the Community Action programs.

Please note that policy changes enacted by the Five County Steering Committee can supersede policies contained in this document. As Five County AOG general policies change, these changes will be made in this policy manual. The Five County AOG Policies & Procedures manual can be found at http://www.fivecounty.utah.gov/hrdocs/2019/JUNE-2019_POLICIES-AND-PROCEDURES-FOR-THE-FIVE-COUNTY-ASSOCIATION-OF-GOVERNMENTS.pdf

Non-Discrimination Policy

It is the policy of the Five County Association of Governments that no person shall, on the grounds of race, color, national origin, religion, age, sex, disability, marital status, family composition, pregnancy, genetic information, source of income, sexual orientation/preference, gender identity, gender expression, political affiliation, or belief be excluded from participation in, be denied the benefits of, be subjected to discrimination under, or be denied employment in connection with any program or activity administered by the Five County Association of Governments.

The Five County Association of Governments is committed to the support of positive practices and efforts which will ensure equal opportunity and nondiscriminatory treatment of all persons, regardless of race, color, religious creed, ancestry, national origin, sex or disability.

However, Five County Community Action reserves the right to reserve service to clients under the following, non-protected circumstances:

- Causes any staff, volunteers, or other clients to feel threaten in any way. This includes sexual harassment, verbal and physical assault, displaying a weapon or a perceived weapon, and issuing threats.
- The client seeks services outside of walk-in hours and without a scheduled appointment.
- The client has been disqualified from Five County assistance as a result of fraud, failure to comply with the terms of service, or any other documented reason for that funding year.

Assignment of Responsibilities

Ultimate responsibility for implementation of the Affirmative Action Program rests with the Five County Association of Governments' Steering Committee. Affirmative Action directives issued by the Steering Committee will be carried out under the immediate direction of the Executive Director, by the Equal Employment Opportunity Officer.

Dissemination of Policy

The Five County Association of Governments will issue policy statements concerning nondiscrimination, equal employment and affirmative action to all employees and subcontractors to give them a knowledge of the laws and basic ideas related to equal employment opportunity. In addition, each employee of the FCAOG will receive a copy of these Personnel Policies which include the Affirmative Action Plan.

The FCAOG will display conspicuously and continuously a poster indicating that discrimination based on sex, race, color, national origin, disability, age, or religion is prohibited by state and federal laws as well as FCAOG policy.

Subcontractors will be informed that all information dissemination should affirm the commitment of equal employment and that procedures utilized in the selection of employees should not be discriminatory.

All advertisements for prospective employment with the Five County Association of Governments will include the phrase "Equal Opportunity Employer."

All county and district officials associated with the FCAOG, along with community groups who would have an interest in furthering equal employment opportunity, will receive a copy of this plan.

Five County Association of Governments Code of Conduct

The following policies are applicable to all employees, volunteers, contractors, and board members. The violation of these policies will result in disciplinary action as outlined in the Five County Association of Governments Policies and Procedures Manual at [http://www.fivecounty.utah.gov/hrdocs/2019/JUNE-2019 POLICIES-AND-PROCEDURES-FOR-THE-FIVE-COUNTY-ASSOCIATION-OF-GOVERNMENTS.pdf](http://www.fivecounty.utah.gov/hrdocs/2019/JUNE-2019%20POLICIES-AND-PROCEDURES-FOR-THE-FIVE-COUNTY-ASSOCIATION-OF-GOVERNMENTS.pdf).

These policies complement and enhance the conduct statements provided by the Utah Department of Human Services and the Utah Department of Workforce Services which have been signed by all department employees. These code of conduct documents can be found here:

Utah Department of Human Services:

<http://dspd.utah.gov/pdf/Department%20Provider%20Code%20of%20Conduct.pdf>

Utah Department of Workforce Services:

<http://jobs.utah.gov/services/tevs/codeofconductagreement.pdf>

Upon request, client will be referred to Five County Association of Governments Policies and Procedures Manual at http://www.fivecounty.utah.gov/hrdocs/2019/JUNE-2019_POLICIES-AND-PROCEDURES-FOR-THE-FIVE-COUNTY-ASSOCIATION-OF-GOVERNMENTS.pdf.

Volunteer Income Tax Assistance Program Volunteer Standards of Conduct:

<https://www.irs.gov/pub/irs-pdf/p5683.pdf>

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek advice from the Five County Executive Team and the Five County Steering Committee.

General Employee Conduct:

The organization and its employees must, always, comply with all applicable laws and regulations. The organization will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and/or bribery.

The organization does not permit any activity that fails to stand the closest possible public scrutiny. All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the organization's operations.

The organization expects its employees to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing, flirting, and similar unprofessional activities are strictly prohibited while on the job (including activities outside of FCAOG property).

Employees must not engage in sexual harassment or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.

The organization prohibits the solicitation and acceptance by employees, of gifts or gratuities in excess of \$50.00.

Lobbying:

Five County staff are encouraged to educate and inform the public on community issues. However, employees are expressly prohibited from lobbying. This includes asking individuals or elected officials at local, state, and federal levels to vote for ***specific pieces of legislation, referring to increasing funding or***

preventing funding cuts, or using federal funds to run for a partisan political office as an employee of Five County Association of Government. This rule also applies to any social media use on behalf of the agency.

Additionally, no federal, state, or locally appropriated funds will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a member of Congress, an officer or employee of congress, or an employee of a member of congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

Prompt Communications:

In all matters relevant to customers, suppliers, government authorities, the public and others in the organization, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

Cash Handling For Project Income:

Staff and Volunteer Roles

Only employees of the Five County Community Action Program are allowed to receive cash or credit/debit card payments from clients who are paying their processing/application fee (COCS, Rapid-Rehousing client rent, and any other applicable project). Volunteers should not receive or handle payments in any form.

Case managers should not collect income from clients, especially during home visits. Case Managers may collect rent payments in the office.

Record Keeping

At a minimum, there should be records of receipts at the following levels:

Client – Should receive a copy of the receipt from the receipt book / credit card machine / PayPal email confirmation.

Case File – A copy of a receipt of income memo (with credit card batch and sequence number or receipt book number, client name, and payment date, amount, and type) should be maintained in client files for as long as the program is required to retain the record. The staff person should also include the account to which the donation / project income will be

Program Director – The program director should receive a copy for use in preparing budgets, documenting project income for grant match / adjustments, and for auditing client files.

Five County Administration – They should receive a copy for the general ledger and for depositing cash donations / project income.

Receipt of Income Memos

A memo should be created immediately after receiving cash/check or conducting a credit/debit card transaction. A copy should be retained in client files and Accounts Payable (either an electronic or hard-copy).

Satellite Site Deposits

Some offices do not have the ability to safely and securely give cash/checks to admin in St. George Office within the required timeframe. In cases where cash/checks cannot be securely transferred within 3 business days, the Executive Director may authorize staff within the Community Action Department outside the main St. George office to make deposits on administration's behalf. When this occurs, cash/checks should still be double-locked, deposited within 3 business days, and abide by all record-keeping requirements as a staff at the St. George office(s).

[see cash handling policy for bank deposits at satellite site]

[see 24 CFR 576.500 Recordkeeping & reporting requirements]

Five County Community Action Code of Ethics

The following departmental guidelines supplement and enhance the Five County Association of Governments Code of Ethics. Nothing in this department guidelines shall supersede or negative the policies approved by the Five County Steering Committee or the code of ethic documents from the Utah Department of Workforce Services or the Utah Department of Human Services.

FCAOG CAP, as Community Action professionals, dedicate ourselves to eliminating poverty in the midst of plenty in this nation by opening to everyone the opportunity for education and training; the opportunity for work; and the opportunity to live in decency and dignity; and with respect for cultural diversity, commit ourselves to:

- **Remain Focused on Mission** - Recognize the chief function of the Community Action movement at all times is to serve the best interests of people with lower incomes which, in turn, serves the best interests of the entire community. Seek to empower people and revitalize communities. Engage in activities that move us closer to mission achievement and further our positive outcomes.
- **Be Outspoken Advocates and Educators** - Actively inform the community and decision-makers about issues affecting those with lower-incomes. Courageously confront and dismantle myths about social and economic inequality. Participate in promoting policies that support social and economic mobility, which reinforce the values of an equitable society.
- **Inspire Confidence and Trust in the Community Action Movement** - Lead and serve with professional competence and be up to date on emerging issues in our field. Practice the highest standards of personal integrity, confidentiality, respect, honesty, and fortitude in all we say and

do. Bravely confront any behavior or practice that could erode public trust in Community Action or disregard the struggle of people living with low incomes.

- **Practice Service Above Self** - Acknowledge service to the mission, vision and collective values of Community Action is beyond service to oneself. Avoid real and perceived conflicts of interest and ensure undue personal gain is not realized from the performance of professional duties.
- **Be Leaders, Support Leaders, and Create Leaders** - Actively engage people with low incomes in realizing and developing their own leadership skills. Respect and support other leaders, particularly the Community Action board of directors, by providing facts and advice as a basis for policy decisions and upholding and dutifully implementing policies adopted by the board. Personally practice open-mindedness, effective communication, inclusiveness, and self-care. Encourage and facilitate the professional and personal development of associates.
- **Strive for Performance Excellence** - Habitually opt for moving beyond mere compliance. Exercise our influence to inspire excellence through implementation of best practices, maximizing efficiencies, practicing innovation, providing outstanding, trauma-informed customer service, and honestly and robustly evaluating the outcomes of our work.

<https://communityactionpartnership.com/code-of-ethics-2/>

Five County Community Participant Rights & Responsibilities

POLICY: All participants have rights that must be acknowledged and respected. It is important for Community Action that participants have a clear understanding of their rights and responsibilities as they relate to the utilization of services provided. The rights and responsibilities listed below will be available for participants to review and will be explained to them upon their request. Additionally, these rights and responsibilities are in the FCAOG CAP universal application.

RIGHTS: Each participant utilizing services at Community Action has the right to:

1. Be treated with dignity.
2. Have freedom from discrimination.
3. Be assured of the confidentiality of information and privacy for both current and closed records.
4. Be made aware of reasons for involuntary termination and criteria for re-admission into the program. Reasons may include, but are not limited to: the potential harm or acts of violence to participants or others.
5. Be given information about grievance and complaint procedures.
6. Responsive communication from Community Action employees, including Community Action employees responding within a reasonable amount of time.

RESPONSIBILITIES: Each participant utilizing services at Community Action must:

1. Complete and sign appropriate paperwork for the services they receive.
2. Follow the outlines rules of conduct for the services they receive.
3. Refrain from bringing firearms or knives into any Community Action facility or sponsored activity.

4. Comply with the Utah Clean Air Act by not smoking or vaping inside any Community Action facility.
5. Treat all persons in a caring and respectful manner, mindful of individual differences, including cultural and ethnic diversity.
6. Not discriminate against anyone on the basis of race, color, creed, age, religion, disability, sexuality or nationality.
7. Not engage in activities which may be seen as a conflict of interest between OWCA, others involved at Community Action themselves.
8. Communicate with agency in a timely manner. If Community Action receives no response after two weeks of reaching out, your case may be closed and you may need to reapply again for services.
9. Check in every at least two weeks with your assigned case manager.

Right to Refuse Service Policy

Five County Association of Governments Community Action Partnership (FCAOG CAP) does not discriminate based on age, disability, national origin, pregnancy, family composition, race/color, religion, sex, marital status, family composition, pregnancy, genetic information, source of income, sexual orientation/preference, and any protected classes outlined by federal and state law. However, Five County Community Action reserves the right to reserve service to clients under the following, non-protected circumstances:

- Causes any staff, volunteers, or other clients to feel threaten in any way. This includes sexual harassment, verbal and physical assault, displaying a weapon or a perceived weapon, and issuing threats.
- The client seeks services outside of walk-in hours and without a scheduled appointment.
- The client has been disqualified from Five County assistance due to fraud, failure to comply with the terms of service, or any other documented reason. In this instance, the client is still able to apply for services in the next funding year.

Human Service Council Board By-Laws

For the purposes of clarification and understanding of the terms used in these by-laws, the following definitions shall apply:

- A. **Southwest Utah**. The geographical area consisting of Beaver, Garfield, Iron, Kane and Washington counties.
- B. **Five County Association of Governments (AOG)**. (Herein referred to as the “Association.”) The voluntary association of Beaver, Garfield, Iron, Kane and Washington counties, under which Human Service programs function.
- C. **Steering Committee**. The policy body made-up of representatives from each of the five (5) participating county political jurisdictions in the Association, responsible for the total functions of the Association.
- D. **Human Services Council**. (Herein referred to as the “Council.”) That body responsible for Human Service functions in the five (5) county areas (Southwest Utah).
- E. **Ad-hoc Work Committees**. Sub-committees by the Council to assist in carrying out specific responsibilities.
- F. **Sub-Councils**. Advisory groups recommended and organized by the Council.
- G. **Community Action**. The goal of community action agencies is to reduce poverty, revitalize low-income communities, and empower low-income individuals and families to become fully self-sufficient.
- H. **Tripartite Board**. A board that shall be divisible by three; and shall not have more than one-third elected or public officials, not less than one-third low income representatives, with the remainder from the private sector.

ARTICLE II: NAMES

The name of this body shall be “The Human Service Council.” For identification purposes within this document, the Human Service Council shall also be known as the Council.

ARTICLE III: PURPOSE

The Human Services Council is charged with the responsibility of making policy recommendations to the Steering Committee of Five County Association of Governments (AOG) on all matters pertaining to community action agencies in Southwest Utah.

Tripartite boards are responsible for oversight and governance of community action agencies. The duties of the Council include, but are not limited to:

Development

Conduct periodic needs assessments of the causes and conditions of poverty within the five county area and to decide what role, or mission, the agency will assume relative to other community organizations and resources, in addressing those needs.

- Needs Assessment
- Clarifying Agency Mission

Planning

Participate in agency annual and longer-range planning activities. Specifically, individual members of the board, and the board as a whole, ought to contribute to, and benefit from, various aspects of program planning:

- Long-range Strategic Planning
- Annual Planning

Implementation

Because members of the Council have "advisory" responsibilities members are expected to carry out their duties as any "reasonably prudent person" would do. At a minimum, this would require:

1. Regular attendance at board and committee meetings;
2. Thorough familiarity with core agency information, such as the agency's bylaws, articles of incorporation, sources of funding, agency goals and programs, Federal and State CSBG statutes;
3. Careful review of materials provided to board members;
4. Decision-making based on sufficient information;
5. Ensuring that proper fiscal systems and controls, as well as a legal compliance system, are in place; and
6. Knowledge of all major actions taken by the agency.

ARTICLE IV: GOVERNANCE OF THE COUNCIL

SECTION 1. General Governance. As the Human Service Council is responsible for Community Action activities in Southwest Utah, the Council shall participate in policy development and implementation as delegated by the Five County Association of Governments Steering Committee.

SECTION 2. Powers of the Council. The Human Service Council may exercise all powers created hereunder. The Council shall designate staff and/or council members to make all recommendations to the Steering Committee of the Association.

SECTION 3. Council Membership. The direction and management of the affairs of the Human Services Council shall be exercised, conducted, and controlled by the Council membership, which shall consist of fifteen (15) members. Each board member will have one vote.

- a) Composition and Manner of Selection: The Council membership shall be divisible by three; and shall not have more than one-third elected or public officials, not less than one-third low-income representatives, with the remainder from the private sector. The fifteen (15) members of the Council shall be appointed and elected as follows:
 - I. Five (5) members shall constitute the public sector of the Council and such members shall be appointed by the county commissions in each of the five counties which make-up the Southwest Utah jurisdiction.
 - II. Five (5) members shall consist of a low-income representative selected by low-income residents in a democratic selection process. This representative shall be nominated by individuals who are low income and the vote shall be implemented in a low income community program. The elected representative will then be submitted for approval by the county commission in the county they are representing.
 - III. Five (5) members shall consist of a commissioner from each of the five counties, which make-up the Southwest Utah jurisdiction.
- b) Each board member must be a resident of the county they are representing.
- c) Term of Appointment. A member of the Council shall be appointed for a staggered term of two (2) or three (3) years. Council member may be re-appointed by the representative county commissioners of the county they are representing.
- d) Equal Opportunity. Appointments to the Council shall not be withheld on the basis of race, creed, color, sex, age, political affiliation, or national origin.

- e) Low-income individuals, community or religious organizations, or representatives of low-income individuals that consider themselves inadequately represented on the Five County Human Service Council may petition the Council to adjust and realign Council membership. The petition should be submitted to the Community Action Program Director at the Five County Association of Governments. At this time the information will be provided to the Council for review at the Council meeting. Petitioner will be informed of the outcome of the meeting.

SECTION 4. Resignation of Council Member. Any member may resign from the Council by filing a written resignation with the chairperson. The resignation shall be effective as of the date it is received by the chairperson. Three consecutive unexcused absences may constitute a resignation and may be considered for acceptance by the Council. Human Service Council members may be removed whenever it is recommended by the Council that such removal would be in the best interest of the functions of the Council. Such removal shall be without prejudice to the rights, if any, of the person so removed.

SECTION 5. Vacancies. In the event of any vacancy occurring in the Council by death, resignation, disqualification, end of term, or otherwise, the remaining Council members shall continue to act; and such vacancy shall be filled by the appropriate constituents' organization and described in Article IV, Section 3.

- a) Onboarding. New board members will receive an orientation within 6 months of appointment. Topics covered in on-boarding include (but not limited to):
 - (i) Board Governance Toolkit (attached)
 - (ii) [ROMA for boards training series](#)
 - (iii) Strategic Plan
 - (iv) Organizational Standards
 - (v) Community Needs Assessment
 - (vi) Community Action Plan
 - (vii) Bylaws (Including Demographic Selection Policy)
 - (viii) Whistleblower
 - (ix) Conflict of Interest
 - (x) Financials (from current fiscal year)
 - (xi) Open and Public Meeting Act
 - (xii) Community Services Mission Statement
 - (xiii) Annual schedule of meetings, important dates

SECTION 6. Meetings.

- a) Regular Meetings. The Council shall meet at least four (4) times a year at a time and place determined by the Council. Notice of such regular meetings shall be mailed to Council members no later than five (5) days prior to the meeting. All meetings will be scheduled for the convenience of the members and the public. The notices of any such

meetings will include the agenda to be considered. Public notices will be posted at least 72 hours prior to the time of each Council meeting.

- b) Special Meetings. Special meetings of the Council may be called by or at the request of the chairperson or by two (2) or more of the Council members. Notice of any special Board meetings shall be given in writing at least five (5) days before the scheduled meeting.
- c) Electronic Meetings. Any Human Service Council members may participate by electronic means at any meeting by giving advance notice to the Community Action Director prior to Community Action posting the agenda for the meeting 72 hours in advance of the meeting. The anchor location information will be posted in the public notice on the Utah Public Notice Website.
 - a. The following definitions shall apply to this section. All other words shall carry their normal and natural meaning.
 - i. Act: The Open and Public Meetings Act established in Utah Code Title 52 Chapter 4.
 - ii. Anchor Location: a location or locations for the public meeting to take place, where interested persons and the public may attend and monitor the open portions of the meeting, and if public comment is accepted, to participate in the meeting, at least one of said locations is the Commission Chambers at the Kane County Courthouse, unless changed by resolution.
 - iii. Electronic Means: any system or combination of systems that is reasonably available to the County Clerk or other appropriate county staff to operate, including a phone, one or more phones or phone systems or other electronic or video system or combination of systems, that would allow one or more Commissioners to participate in a Board meeting, which system or systems allow all Commissioners to adequately hear each other and allow interested persons and the public to attend and monitor the open portions of the meeting and if public comment is accepted to participate in the meeting.
 - b. Council members who participate in a meeting by Electronic Means shall be counted towards the quorum requirements of the Act.
 - c. A meeting may be conducted entirely by Electronic Means with no Human Service Council members present at the Anchor Location.
 - d. For any meeting, whether one or all council members are participating by Electronic Means, Community Action shall provide adequate personnel to be

present at all Anchor Locations to ensure that interested persons and the public may attend and monitor the open portions of the meeting and if public comment is accepted to participate in the meeting. The Anchor Location for any meeting shall have adequate space for interested persons and the public to attend and to participate.

- e. Community Action may establish more than one Anchor Location so long as each location is sufficient to comply with the Act.
- f. If one or more council members have given notice to Community Action to participate by Electronic Means, Community Action shall give notice of this information to the other council members at least twenty-four hours in advance of the meeting and shall provide the information on how the council members will participate.
- g. Community Action shall otherwise ensure that all recording requirements of the Act are complied with for any electronic meeting.
- h. No Commissioner may participate by Electronic Means, and no Board meeting shall be conducted entirely by electronic means unless the Electronic Means are adequate to fully comply with the Act.

SECTION 7. Quorum. A quorum to conduct regular business shall consist of one-half of the 15 members of the council seats (8 persons). No formal action will be taken unless a quorum is present. Furthermore, no financial decisions relating to budgets, appropriations, or general financial decisions shall be made without at least 3 of the 5 county commissioners present. A majority of those in attendance at any meeting shall, in the presence of a quorum, decide any action. If less than a quorum of the Council is present at the time and place of any meeting, the Council members may adjourn the meeting until a quorum is present. The Council members may discuss informal business but may not vote nor take formal action without a quorum being present. If a quorum exists but a majority of commissioners are absent, the quorum may take formal action on all matters, except for those relating to budgets, appropriations, or general financial decisions.

SECTION 8. Conflict of Interest. Members of the Council shall abstain from voting or otherwise being involved in the decision-making process when it might be interpreted that they could economically, politically, or personally benefit from such action. This same individual shall not be restricted from answering questions or otherwise participating in providing information pertinent to the decision-making process of others.

Full disclosure of financial interest is required for all council members and staff.

SECTION 9. Conduct of Meetings. Robert's Rule of Order, Newly Revised, shall govern the conduct of all meetings.

ARTICLE V: OFFICERS

SECTION 1. Number of Officers. The officers of the Council shall consist of a chairperson and vice chairperson.

SECTION 2. Election, Term of Office, and Qualifications. All officers shall be approved by the Steering Committee of the Association, based on recommendations for chairperson as determined by vote of the Council and shall hold this office for one (1) year. A person may be re-appointed by a majority of the Council to serve additional one (1) year terms.

SECTION 3. Vacancies, Removal, Resignation. A vacancy in any office because of death, resignation, removal or disqualification, or any other cause, shall be filled for the unexpired portion of the term in the manner prescribed by these guidelines for regular appointments or elections to such offices. An officer may be removed, either with or without cause, by vote of a majority of those in attendance at any regularly scheduled meeting of the Council, at which a quorum is present, if the matter of the removal was included in the notice of the meetings as provided in Article IV, or at a special meeting of the Council called for that purpose. Any officer may resign from office at any time by giving written notice to the Council. Any such resignation shall take effect upon being accepted by the Council. Three (3) consecutive unexcused absences may constitute a resignation and be considered and approved by the Council.

SECTION 4. Duties of Officers.

- a) The Chairperson. The chairperson shall preside at all meetings of the Council. The chairperson, upon approval of the Council, shall appoint ad-hoc work groups responsible for assisting the Council in its activities. The chairperson shall carry out other duties and responsibilities consistent with these by-laws, as may be assigned to him by the Council, Steering Committee, or state and local statute.
- b) The Vice Chairperson. At the request of the chairperson, or in the absence or inability to act, or if the office be vacant, the vice chairperson may exercise all the duties and powers of the chairperson. The vice chairperson shall perform such other duties as may be assigned to him by the Council or Steering Committee.

ARTICLE VI: COMMITTEES

SECTION 1. Ad-Hoc Committees. The chairperson of the Council may appoint, with the approval of the Council, such ad-hoc work committees as may be necessary or appropriate to carry out the objectives and purposes of the Council. Each such work committee shall be appointed for the period required to execute its duties. With the approval of the Council, individuals who are not members of the Board and who have special knowledge or background that may be appropriate to the Committee task may be appointed to serve on such committees in an advisory or consultative capacity. A Council member shall be the chairperson of all standing and ad-hoc work committees organized by the Council. An Ad-hoc committee shall limit its activities to the accomplishment of those tasks for which it is appointed and shall have no powers except those specifically conferred by action of the Council and approved by the Steering Committee. The committee shall periodically inform the Council regarding progress and shall report completion of the special task and any recommendations resulting. The Council will take action on any recommendations forwarded to the Council by the Ad-hoc committee and present to the Steering Committee for approval.

ARTICLE VII: REVISIONS

SECTION 1. Amendments. These by-laws may be altered, amended or repealed and new by-laws may be adopted by the affirmative vote of two-thirds (2/3) of the Council members. However, at least five (5) days written notice shall be given of the intention to alter, amend, repeal, or adopt new by-laws. Proposed changes will be available for review five (5) days prior to meeting

RE-ADOPTED BY RESOLUTION OF THE HUMAN SERVICE COUNCIL ON: July 13, 2022

Whistle-Blower Policy

A whistleblower as defined by this policy is an employee of Five County Association of Governments who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resources Director. The employee must exercise

sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to those responsible for investigating and coordinating corrective action (Program Director, Deputy Directors, Executive Director, HR, and Steering Committee members).

Employees with any questions regarding this policy should contact the Director of Human Resources.

Record Retention

Records for federal and state programs

Records must comply with state and federal requirements. Physical records should not be kept longer than necessary and should be either shredded or burnt after the retention period has end. The actual period will depend on grant source.

Non-federal or state programs

For non-federal or state programs, such as court ordered community service, records shall be maintained for five years. After such time, physical records will be destroyed.

Confidentiality

All physical files must be stored on-site at Five County Association of Governments and must be double locked (meaning locked inside a cabinet in a locked room where non-authorized staff cannot have access to the cabinet).

Electronic access to client records should also be restricted. Employees must comply with all end-use agreements of SealWorks, Utah HMIS, CAP60, or any other authorized client database containing person protected information. This includes changing passwords, locking computer screens when away from the desk, not giving any other employee or non-employees access to passwords, secure electronic documents, or physical access to workstations. This includes any data pulled from HMIS, which is stored on a secure server and all computers are password protected.

Applications

Application:

- Confidentiality
- Good for 6 months, unless clients has been working with FCAOG monthly. Otherwise, the contents of the file are shredded
- All Questions asked on the application will be relevant to the requirements of HMIS, CAP60, or other databased used for funding sources.

Client Database Policies

CAP60 database

Case status

Applied: client/applicant has submitted a partial application or a complete application without any funding source linked to them, yet. An eligibility assessment service may be input onto the case when staff work with the client to submit a complete application and are working with them satisfy the application process.

Approved: when client/applicant screening committee approves the funding, the client/applicant is to be funded and case status is to be moved to “approved”. They stay in the approved until the 180 days of follow-ups are completed. All services must be input onto the case.

Denied: client/applicant is either ineligible for any funding, falsified information given to CAP, or there’s no funding for them.

Completed: client/applicant receives services (other than an eligibility assessment). All services are to be input onto the case along with all follow-ups /goals/outcomes. Once the follow-ups are completed and the client does not get any more assistance, move the case to complete.

Pending: this case status isn’t used currently

Expired: used when the case manager hasn’t closed/completed the case status during time of roll over onto the next fiscal year.

Closed: used when the client/applicant is approved to be funded but doesn’t submit needed information, follow program requirements (like paying rental portion for RRh clients), or any other reason they’re not funding with direct client services.

Social Media Accounts

Overview

Social media can be used to frequently communicate with the public and raise awareness of community needs and events. It is also a tool by which Five County Community Action will be compliant with the new organizational standards which go into effect October 1, 2015. These guidelines must be followed:

Authorized Accounts

All accounts must be authorized through the department head prior to being established. The director will maintain a master list of user names and passwords (where applicable, such as in the case of Twitter). Five County Administration will have access to these accounts as well.

For accounts which lack a departmental username and password (such as WordPress and Facebook), all accounts must have at least two administrators at all times, to ensure that department members have access to social media in the event of an emergency or with staff turnover.

All staff or volunteers who leave employment/volunteer service must relinquish all access to all Five County social media accounts prior to departure.

Just Serve Projects

JustServe.org matches faith, nonprofit, community and governmental organizations that need volunteers with volunteers willing to help. JustServe.org is provided as a service by The Church of Jesus Christ of Latter-day Saints. JustServe.org is not for proselytizing or publicity – simply a service to help link community volunteer needs with volunteers.

Five County Community Action has an account that several staff post opportunities on. All accounts must be authorized through the department head prior to being established.

JustServe general guidelines:

1. The best service opportunities are collaborative – working side-by-side with others in the community.
2. Humanitarian service opportunities should assist the poor and those in need of a helping hand.
3. Community service opportunities should enhance the quality of life in the community.
4. JustServe projects should not directly involve volunteers in fundraising, have a political focus, or be for-profit oriented.

Any personal information the Five County Community Action staff member provides will only be used to coordinate JustServe efforts. Submitted projects will be reviewed by local JustServe representatives to ensure they adhere to the above guidelines. A JustServe representative will contact the Five County

Community Action staff member if they have any questions regarding the project. The Five County Community Action staff member will be notified by email once the project has been posted.

If a community member wants to volunteer and contact the listed Five County Community Action staff member, the staff member should contact the potential volunteer within 5 working days.

Community Action Accounting and Procurement Policy

The Five County Procurement Policy can be found at

<http://www.fivecounty.utah.gov/hrdocs/PurchasingPolicy.pdf>

Please also keep in mind that Five County AOG must check a federal clearinghouse to determine if a vendors have been debarred from receiving federal funding. This is another reason prior approval of purchases are important.

HEARTH Act Educational Assurances Policy

Overview:

While both housing programs and school districts strive to provide the best service possible and link families to one another in order to provide supports, it is still up to the family to choose to use the service. A housing program cannot force a family with a student to be a member of the McKinney-Vento program at the school they are attending. Nor can the housing program refuse to provide housing services because of a family's choice to not use a school McKinney-Vento program. In addition, the school programs cannot require that a student live in a shelter or be a part of a housing program to receive school based services.

Five County Association of Governments – Community Action Partnership must follow these policies and best practices for all housing programs. To the extent possible, these best practices should also be incorporated into non-housing programs, emergency food assistance, transportation programs, VITA, etc.,

The following policy's goal is to provide procedures and best practices relating to the requirements under the HEARTH Act for funding programs seeking or receiving Continuum of Care funding from Housing and Urban Development (HUD) monies.

Definitions:

1. Continuum of Care (CoC): The group of community stake holders charged with developing a community-wide plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.
2. Housing Program(s): refers to any area housing program seeking or receiving Continuum of Care (CoC) funding originating from HUD monies from CoC Homeless Assistance Programs. For Five County Association of Governments, this also includes federal and state homeless funding sources administered through the Utah Department of Workforce Services – Housing and Community Development Division
 - a. Permanent Housing programs that fall under this category would include with their intake paperwork a flyer/brochure defining and listing the McKinney-Vento Education Rights of homeless students.

- b. For Permanent Supportive Housing that fall under this category the assurances and policies are the responsibility of the contracted supportive service provider.
- 3. Family: a parent/guardian with children ages 3- 21 (who have not yet graduated from high school).
 - a. Note: some “families” might contain heads of household (HoH) who are under 21 with dependent children. In such instances, if the HoH has not yet graduated from high school, BOTH the HoH and dependent children would qualify under this policy.
- 4. McKinney-Vento Educational Services: refers to the primary piece of federal legislation dealing with the education of children and youth experiencing homelessness in US Public Schools.
- 5. McKinney-Vento Homeless Assistance Grants: represents the primary source of federal funding for programs serving homeless people.

POLICY:

HUD ASSURANCE (1):

The Continuum of Care applicant will be required to demonstrate that it is collaborating with local education agencies to assist in the identification of homeless families as well as informing these homeless families and youth of their eligibility for McKinney-Vento education services.

- 1. The CoC will have a school district liaison serve on the Interagency Committee to provide school district representation.
- 2. Intake process for housing programs will include a section about children (ages 3 to 21) in the household. This section of the intake should ensure the following:
 - a. Name and age of the child(ren)
 - b. Grade the child(ren) is in
 - c. School the child(ren) is attending, or last attended
 - d. Transportation method to get to and from school
 - e. Identify needs to participate in school appropriately (i.e. school supplies or clothing)
 - f. Determine whether the child(ren) is currently a part of the school’s McKinney-Vento program
 - g. Indication that school based services were discussed

3. Parents/Legal Guardians/Unaccompanied Youth will be offered the ability to sign a release of Information allowing the housing provider to speak with the school/early childhood education provider to coordinate services. This release should not expire immediately upon the family leaving the program, but sometime after. This will allow the program to notify the school/early childhood education provider of changes to support the needs of the family. Parents/Legal Guardians/Unaccompanied Youth retain the right to refuse to sign a release of information.
4. Housing programs will forward a release of information/demographic information sheet to school districts/early childhood education providers to start the process for the student being enrolled in services.
5. Housing programs will notify families, during the housing program intake process, that they have rights and protections at schools for their school aged children and youth.

HUD ASSURANCE (2):

The Continuum of Care applicant will be required to demonstrate that it is considering the educational needs of children when families are placed in emergency or transitional shelter and is, to the maximum extent practicable, placing families with children as close to possible to their school of origin so as not to disrupt the children's education.

1. The Continuum of Care will require that the Agency that completes the Coordinated Entry Intake Process includes using child/youth educational information as a part of determining appropriate placement in a specific housing program. Child/youth educational information should include:
 - a. Name and age of the child(ren)
 - b. Is the child(ren) enrolled in school/early education program
 - c. Name of the school/early education program the child(ren) is attending, or last attended
2. The area Homeless Management Information System (HMIS) will include a section where housing programs can indicate that a referral to the school district's McKinney-Vento program has been completed. This will be completed by the housing program once the referral is made regardless if the family chooses to access the school services or not.
3. The CoC/Housing programs will notify families that a child(ren) may attend any school of their choosing in coordination with school district/early education program policies.

4. Housing programs will notify families of the ability of school districts to provide transportation services to keep the child(ren) in their school of origin and assist in coordinating this service for the child(ren) as appropriate.

HUD ASSURANCE (3):

Project applicants must demonstrate that their programs are establishing policies and practices that are consistent with, and do not restrict the exercise of rights provided by the education subtitle of the McKinney-Vento Act, and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness.

1. Housing programs will allow families and child(ren) to miss required functions if they are participating in a school related activity.
2. Housing programs will allow flexibility in curfew requirements in order to allow families and children the ability to participate in school related activities.

HUD ASSURANCE (4):

Project applicants must demonstrate that programs that provide housing or services to families are designating a staff person to ensure that children are enrolled in school and connected to the appropriate services within the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney- Vento education services.

1. Each housing program will identify a lead person within the agency that will be the contact for school districts/early childhood education programs if issues, concerns, or changes to processes/law/procedures occur.
2. The school district liaison serving on the Interagency Council will keep the CoC updated with a list of housing program leads and make the list available for housing providers, school districts, early education programs, and other agencies.

Addendum:

HUD Assurance (1) Suggested Best Practices:

1. The CoC/Housing programs will request letters of support/letters of collaboration from school districts at the time of application of funding, and as appropriate afterward. These will be used to demonstrate collaboration of services.
2. The CoC will consider education and early care issues as they relate to the various programs.
3. Housing programs should have the educational rights of homeless children and youth displayed in areas where families frequent. (These are available in English, Spanish, Russian, Marshallese, and Vietnamese currently. If other languages are needed the program can request this of a school district.)

4. Housing programs should have the area wide brochure of school McKinney-Vento services available to families, both that the family can notice their own and in offices where case managers meet with families.
5. Housing programs invite school districts/early childhood programs to participate in program happenings and community events in order to collaborate. These may include family nights, resource fairs, meet and greet nights, and other events organized and held by area shelter and housing providers and agencies.
6. Housing programs can invite school districts/early childhood education providers prior to school starting for registration with school level McKinney-Vento services.
7. Housing programs can invite school district personnel/early childhood education providers to case management meetings to staff specific cases.
8. Housing programs will have meeting spaces available for school districts/early childhood education providers to meet with families, conduct early intervention screenings, etc.
9. Housing programs/CoC to have links to school district services/early education programs available on websites.

HUD Assurance (2) Suggested Best Practices:

1. The CoC/housing programs will work with school districts to have an updated list of schools that are near housing programs and maps of school sites for reference.
2. Housing programs will notify school districts/early childhood education providers of changes in the housing program/status/location of families to ensure services are modified appropriately.
3. Housing programs will make referrals for educational needs of a child(ren) for additional school district/early childhood education program services. Services may include:
 - a. School supplies
 - b. Appropriate clothing
 - c. Supplemental education needs (special education, English language learning, etc.)
 - d. Extracurricular activity needs
 - e. School participation fees
4. The CoC/Housing programs will develop a guideline of school related issues to discuss with families. This can be done jointly with school districts. It can include issues such as:

- a. McKinney-Vento rights and protections
 - b. Impact of changing schools
 - c. Ability of families to seek additional school services for a child in need
 - d. Participation in extracurricular activities
5. Housing programs will develop supplemental educational services that fit their environment (i.e. homework center, tutors, mentors).

HUD Assurance (3) Suggested Best Practices:

1. Housing programs and school districts will have cross training opportunities.
2. The CoC will have basic training available on the CoC website about school district McKinney-Vento guidelines and about HUD McKinney-Vento guidelines. Ensure that the training includes school district definitions of homeless services is much broader; and families may qualify for school district services when they don't qualify for HUD services.
3. Housing programs have the opportunity to participate in free educational webinars offered by the National Center on Homeless Education.

HUD Assurance (4) Suggested Best Practices:

1. Each housing program will ensure that case managers for families receive basic training on the rights of homeless children and youth in schools.
2. The Interagency Committee will work with local school districts to learn about professional development opportunities that are available and communicate the opportunities to the housing programs.

General Volunteer Policies and Procedures

Short-term Volunteers

Those serving for less than a month or fewer than 20 hours do not need a background check, but may not have access to restricted areas, client or confidential information, or positions only available for longer-term volunteers. As such, these volunteers must always be within the line of sight and/or hearing of a supervisor who has passed a criminal background check.

Court Ordered Community Service Volunteers that volunteer at any Five County AOG Community Action are not required to have a background check.

Standard volunteer application form

Unless volunteer is signing up for a specific program with a different application process, all volunteers must use the current Five County AOG Community Action General Volunteer Form. Staff must follow up with applicants within three business days. After receipt of application, the appropriate volunteer coordinator will schedule an interview.

Interview and Background check

- Sex offender first – registry
- Utah state background check

Allow volunteers to choose their own opportunity for service as much as possible. If a volunteer is unwilling to perform the volunteer positions requirements, it will be difficult to accommodate. However, don't assume based on prior work history, volunteerism, and or/ educational obtainment that volunteers will automatically want to do the same duties (Don't assume a receptionist will want to answer phone, etc.).

"If you have any violations which would restrict you from serving in the public in any way."

Volunteer Rights

Volunteers must sign that they acknowledge being at will and may be released at any time. However, volunteers should be apprised of the Five County grievance procedure

[See forms Five County AOG Community Action General Volunteer Form]

Code of Conduct

All volunteers not covered through a specific program code of conduct (court ordered community service and VITA), must sign the Utah Department of Human Services and Utah Department of Workforce Services codes of conduct papers.

Having a violation is not automatic disqualification for service, unless the specific program or funding source requires such action. For instance, those with sex and violent offences may be able to serve as a VITA volunteers with restrictions/ supervision.

Dress Codes and Conduct

Real shoes, no sandals and flip-flops. Should have good hygiene

Assessments

Assessment

This initial interview will provide information vital to understanding what can, or cannot, be done for a client. The first step in this interview is to ask questions to understand client goals, barriers, and how staff can support. The assistance given is intended to facilitate self-sufficiency and/or economic security.

Another helpful hint is to make sure that when doing the interview to use open-ended questions that will allow the client to share their information with you. It is ideal to be able to guide the interview to save time, but a real understanding is essential and may take time.

Listed below are some examples of questions that may be helpful in finding information. These are suggestions and should be used in ways that you find most comfortable. When you are comfortable interviewing, interviewees will be comfortable in responding.

- What is your one-time crisis?
- What are you looking for?
- Where did you sleep last night?
- Do you have a Job?
- Are you working with any other agencies?
- What can you do on your own?
- Will you be able to continue to pay for things, once FCAOG CAP funding is done, and how?
- Where would you like to see yourself in 6 months, 12 months, 2 years?

DBA Baseline Assessment or Arizona Matrix Assessment

For clients who are not homeless and attempting to access services (which will be most community members served through CSBG). The AZ matrix reviews strengths and vulnerabilities and is accessible in CAP60. This assessment can be administered monthly to track client progress, identify barriers, and help case managers celebrate client progress and strengths.

Assessment for Homeless

There are several types of standard ASSESSMENTS available to assess a client requesting housing services (i.e. VI-SPDAT FAMILY, SPDAT, YOUTH SPDAT, etc.).

For homeless clients (see table below for homeless definitions as defined by HUD), the SPDAT is used as the assessment tool to review with the client who is experiencing homelessness or at-risk of homelessness. Make sure to review and sign (both client and case manager) the Utah Homeless Management Information System (HMIS): Informed Consent Release Form. If the client already has a SPDAT in HMIS (Homeless Management Information System) and it is less than 6 months old, a new SPDAT does not need to be administered. However, if the SPDAT assessment is older than 6 months, FCAOG staff can complete a new one. If the client or case manager feels like their previous

assessment was inaccurate or their situation has changed, a SPDAT assessment can still be conducted (no matter how new the SPDAT is).

There are two different forms, one for Families and another for individuals. If the household is two adults with no children, then two individual assessments are completed, with the highest vulnerability score of the two used to enroll a coordinated entry enrollment into HMIS. These forms can be printed and filled out and then entered online, or entered directly into HMIS, whichever is most convenient for the interviewer.

[See Forms Appendix for Five County Association of Governments Community Action Coordinated Assessment Consent]

[See Forms Appendix for Five County Association of Governments Release of Information]

[See Forms Appendix for Service Prioritization Decision Assistance Tool (SPDAT)]

[See Forms Utah Homeless Management Information System (HMIS): Informed Consent Release Form]

[See Form [Community Action Application](#)]

Assessments/ HMIS / CSBG Data Entry

Homeless Assessments:

Category 1,3, or Category 4 (see homeless definition) will be assessed for rapid re-housing as part of coordinated assessments within the Five Counties area. Five County case managers may assist other agencies with completing assessments and can travel to meet clients, as appropriate and needed. When unsheltered clients present themselves at Five County offices in Cedar and St. George and indicate they are homeless, VI-SPDAT and/or SPDAT assessment are conducted by Five County Community Action staff members.

All client information entered in HMIS and CAP60 will require a signed consent form. If signed, client information is accessible to those who provide access via HMIS and CAP60 policy. Additional CSBG consent forms will be signed to release information to agencies not using the coordinated assessment and/ or do not have HMIS access.

One of the most important things to know with assessments is that FCAOG CAP keeps the score confidential.

Once FCAOG CAP has entered the scores into the Utah Homeless Management Information System (UHMIS), they are prioritized. Their score rates them according to what services they are available for.

[see forms for 5 Co. VI-SPDAT & SPDAT Consent]

[see forms for UHMIS Informed Consent Release Form]

SPDAT Scoring

A VI-SPDAT assessment should be followed up by a SPDAT assessment for clients who have the score required to complete a SDPAT. The SPDAT will be used as a tool for prioritizing housing clients for rapid re-housing. Those with greatest need or acuity (who are score on the top of the community housing list) will be housed first.

Entering Client Information into Homeless Management Information System (HMIS):

Prior to client information being input into HMIS, a HMIS Informed Consent form must be presented to the client. If the client signs the form, data entry person can put information release restriction in HMIS as “Restrict to MOU/Info Release”. If the client does not want to sign the HMIS Informed Consent form, the data entry person must still put the information into HMIS, but put the information release restriction in HMIS as “Restrict to Organization” instead. Note: if the client is input as “Restrict to Organization”, they will not show up on the HMIS housing list by any other agency except the data entry person’s log-in.

Case managers must input services into HMIS no later than 5 days after a service has been rendered (including case management). All enrollments must have the same dates throughout the entire enrollment in HMIS (client paperwork dates must match the enrollment dates in HMIS). Make sure Case notes may be entered at program exit, but should be entered no later than 5 days after a client exits a rapid re-housing program.

Note: Case management is defined as “monthly” service, meaning it is input 5 days after the end of the month.

For information or training on how to input clients into HMIS or input a SPDAT into HMIS, visit <https://utahhmis.org/> or contact the Utah Office of Homeless Services Division with Department of Workforce Services.

Entering Client Information into CAP60:

All client information, services, data, and case notes need to be input into CAP60.

FOLLOW UP

Follow-up is one of the ways used to gather data that can help with the direction, obtaining of, evaluation and future use of funding. Follow-up is also a terrific way of supporting the client through their services with FCAOG CAP, as well as executing prevention services before situations get bad for the client. FCAOG CAP researches the outcomes based on their duration. FCAOG CAP sets up a date based on a 30, 60, 90, 120, 150, and 180-day scale. This is when an FCAOG CAP staff member will contact the client and ask them questions to evaluate where they are and how they are doing, as well as provide referrals and any prevention services the client may need. FCAOG CAP staff members follow up on jobs, housing and any basic ‘outcomes’ that they have had, both positive and negative. A FCAOG CAP staff member then inputs outcomes into CAP60.

All FCAOG CAP staff will complete follow-ups on all clients served, except for the Hurricane Valley Food Pantry and VITA clients.

Customer Satisfaction Surveys

Who

When FCAOG CAP looks at how to improve the services that FCAOG CAP offers there are a few things to look at. One of those is to perform a customer satisfaction survey. This will help find the areas that FCAOG CAP needs to make improvements. This feedback is essential in order to improve our customer service.

FCAOG CAP needs to make sure that each client is offered an opportunity to take the survey. The Customer Satisfaction Survey is also available to others who want to provide feedback, when applicable.

Surveys

As part of CSBG organization, a tripartite board must be provided with customer feedback. They are Five County Community Action Agency Customer Satisfaction Survey. This survey is about the satisfaction with the agency and the staff. It asks questions about the program and the staff and the processes that they follow. It is to look at the actual processes and people involved in the agency. Surveys are good to review both at staff meetings and the Human Service Council meetings.

[See Customer Satisfaction in Survey Monkey]

The customer survey is also available on the Community Action website at <https://fivecountycap.org/customer-survey/>.

Survey Monkey log-in information:

Username: capuser@fivecounty.utah.gov

Password: 5CAOGCAP1070

Process Once Taken

FCAOG CAP processes the results. The online surveys are put together by Survey Monkey and have all of the information organized into easily usable information. Responses are given at the Human Service Council meetings.

Confidentiality notice

There are several parts of confidentiality, but one of the most important part is to ensure that FCAOG CAP lets clients know that it is indeed confidential. Ensuring that they know that the surveys are confidential and that because of that there will be a no retaliation policy. This confidentiality should be written and signed by all involved.

Retaliation Policy

The retaliation policy is that there will be no withholding of benefits or services based on the responses to any of the surveys.

Intake

All applicants/clients have rights that must be acknowledged and respected. It is important to the Five County AOG- Community Action Partnership that all applicants/clients understand their rights and responsibilities as they relate to utilization of services provided at Community Action. The rights and responsibilities will be available in the universal application for applicants to review, receive any questions or concerns answered by Community Action staff – upon request, and sign. Additionally, upon applicant/client's request, can be referred to the Community Action website if they want a copy of the Code of Conduct or Grievance Procedure.

Initial Client Intake / Agency Referral

Applicants have a variety of ways to go through the intake process: walk-in (paper or online application), online application, client calls in and intake worker can input the information for them (over the phone), or community partner provides a paper application.

Application Process

All required intake paperwork will be listed on a checklist for each program. A release of information form is required annually.

[See Form [Community Action Application](#)]

[see Forms [checklist](#) (by grant)]

Self—Sufficiency Interview

An important part of the application process is the initial interview. This interview started with the first conversation with the client. The focal point of this interview must be to find and define how the client will move toward self-sufficiency and/or economic security, which is defined as an increased economic independence of a household with decreased reliance on social service(s) or income maintenance programs over a length of time. This interview is to find and develop the methods to accomplish this end. This also includes identifying barriers to self-sufficiency, working on client strengths and goal achievements.

Income Documentations Required from the Client

To accurately determine income eligibility for program services, the eligibility determinations must be based on **gross** household income for the 30 days prior to application for assistance/services. In order to continue to qualify for services, FCAOG CAP will require funded recipients to submit approved income documentation at a minimum of once every 12 months. Acceptable source documentation includes, but is not limited to the following:

- Check stubs
 - For servers/ tip based pay:

- Have to include tips, if applicable
- OR calculate hours from paystub by \$10 / hour
- Bank Statements
- Proof of SSI or Social Security (benefit letter)
- Written statements from employers ([DWS Employment Verification 630](#))
- Previous year tax form 1040 for self-employed individuals
- Award letters for government transfers
- DWS 24 month report (explaining any benefits, including financial assistance, received)

In order to accurately demonstrate client eligibility, the following items must be included in each client file:

- Current poverty guidelines
- Gross income for all household members over 18 years old and not in high school (as determined from the above sources)
- Source documentation for determining income and income types and amounts
- Calculations used to determine annualized gross income

FCAOG CAP must collect the last 30 days of income for all adults in the home. Intake worker is to input income into CAP60 as “monthly”, print off the CAP60 Eligibility sheet that shows the percentage of poverty the household is at during intake. For households that submit net income only, the intake worker is to calculate gross by using the following formula: net amount x .0765, then add that amount back into the net amount, which will give you the gross amount.

Net x .0765 = Tax amount tax amount x Net = gross

In some instances, households with no income may not have income verification which meets the typical verification process for intake. In these instances, a self-declaration of no income signed by the client can be accepted (**after attempts at collecting income documentation fails like last year’s taxes or bank statements**).

Once an application is filled out, submitted, and verified, if any household member refuses to disclose income, or sign a self-declaration of no income, that client will not be eligible for services under CSBG funded programs.

(see forms [self-declaration of no income](#))

Eligibility Assessment

FCAOG staff members can screen applicants for eligibility into any Community Action Program. Staff will stay up to date on all program eligibility requirements for the person to be referred to appropriate program.

CSBG Eligibility Requirements

For anyone to qualify for CSBG assistance, the household must be at/below 200% of the federal poverty level AND have be willing to work toward economic security.

COC or ESG Eligibility Requirements

Some of the COC and ESG program actually require applicants to be chosen from a homeless list (see HMIS By Name List).

COC and ESG applicants will be chosen through the Coordinated Entry process through either the Washington or Iron County Coordinated Entry group. The households with the highest score on the list will be chosen to fill open spots. However, only people with a DOVE alias on the HMIS by-name list can be chosen for the COC Th-RRh program. No “side dooring” will be allowed (see Rapid Rehousing policy and procedure of “side dooring”).

Those selected will be either Category 1,3, or Category 4 from the definition of literal homeless, as per 24 CFR § 576.2. Those chosen for selection will be working with the DOVE Center either as the individual access emergency shelter or continues DOVE Center’s Outreach Services. In the case of outreach, DOVE Center would have to validate that the client satisfies Category 4.

Category 1 – Literal Homeless:

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation (car, park, abandoned building, bus or train station, airport, campground); or
- ii. 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 programs); or
- iii. 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

Category 3 – Homeless under other Federal statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes, AND
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; AND
- iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days of application; AND
- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers of:
 - a. chronic disabilities, or
 - b. chronic physical health or mental health conditions, or
 - c. substance addiction, or
 - d. histories of domestic violence or childhood abuse (including neglect), or
 - e. the presence of a child or youth with a disability, or
 - f. two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4 – Fleeing/Attempting to Flee DV:

Any individual or family who:

- i. Is/are experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; AND
- ii. Has no other residence; AND
- i. Lacks the resources to obtain other safe permanent housing.

HEARTH-ACT Coordination

All staff working with TH-RRH grants are required to comply with HEARTH Act requirements [Please see “HEARTH Act Educational Assurances Policy”]

TANF Eligibility Requirements

For anyone to qualify for TANF rental assistance, the household must have

- at least one citizen in the household
- at least one child under 18 years old or 3rd trimester pregnancy
- at/below 200% of the federal poverty level or receiving public assistance verifiable through e-share
- Experiencing a one-time crisis

REQUIREMENT CHECKLIST

FCAOG CAP staff will ensure all needed information is being collected on intake forms. Each program will have a checklist specific to those program eligibility requirements. Each program checklist contains a list of pertinent information that will help assure that all the necessary documents have been obtained.

Required as part of COC or ESG RRH intake:

- A complete/signed FCAOG CAP application including the HMIS Informed Consent Release.
- A copy of the SPDAT used to qualify household for Rapid Rehousing (add to digital & physical file). This can be found in HMIS or requested from the person who conducted the SPDAT.
- Heart Act questions ANSWERED on back page of checklist sheet
- Homeless certificate, which includes a letter from the shelter (if needed) or a dashboard screenshot on HMIS that they’re at a local shelter. A self-declaration of housing is used when these documents cannot be collected but should be used as a last resort.
- Signed Rapid Rehousing Consent to Participate
- Signed Staff Certificate
- [UHMIS Basic Assessment Form](#) (the date on this form will be used for intake/enrollment in HMIS)

Other documents collected if don't get them by intake. Case Manager still should get them as soon as possible:

- Last 30-days of income or self-declaration. This is required for CSBG, which is a match for COC and ESG Rapid Rehousing funding. Any applicant that doesn't submit income cannot be funded with any CSBG funding, just their Rapid Rehousing funding.
- Picture ID
- Social security numbers for all household members. HMIS collects the social security numbers on all household members. This is not required but is counts toward data error rate on the data quality reports. Please make several attempts to get the numbers.
- Any past utility bills client may need help with getting these bills paid off IF they're a barrier to housing
- Housing stabilization plan, signed by the client

Required as part of CSBG/SSBG intake:

- A completed/signed FCAOG CAP application
- The AZ Matrix or VI-SPDAT or SPDAT
- Heart Act questions ANSWERED on back page of checklist sheet (see "HEARTH-ACT Coordination" section and "CHECK LIST w/ HEART ACT" form)
- Last 30-days of income or self-declaration or DWS MyCase 24 Month Report.
- Picture ID

Required as part of TANF intake:

- A completed/signed FCAOG CAP application including the TANF Income Guidelines and HMIS Informed Consent Release.
- Signed Forms 300 and 115c
- Picture IDs for all household members over 18 years old
- Social Security cards or birth certificates for all household members
- E-share benefits screenshot or proof of categorical eligibility determination OR Last 30-days of income
- Client's housing situation, client statement and case plan
- Signed TANF Employment Pathway

[See Forms Appendix for [CHECK LIST](#) w/ HEARTH ACT for FCAOG COMMUNITY ACTION for each program

DENIAL OR REJECTION

After intake is completed, the intake worker and/or case manager will call the applicant and let them know that they didn't qualify for CSBG services within three (3) business days after intake is completed. Best practice is for the applicant to receive referrals, options to apply again if their situation changes, and the appeal process via phone call or general denial letter.

1. The intake worker will explain to the client all the ways a client may qualify for funding (receiving current DWS services, previous federal tax returns, etc.).

The client may then have another chance to submit any documentation required to see if they qualify again.

2. If the applicant wants to meet with the Community Action Director to submit an appeal, the applicant will receive the Director's contact information. The Director will receive the physical file and any pertinent information of the applicant in order to make sure that there are no discrepancies or problems when the client comes in.

The denial letter, phone call, or email is designed to ensure that the client understands the process that was followed and the reason for the denial. The applicant will be informed of how the needs of the funding sources haven't been met, keeping it simple and concise.

[See Form [DENIAL LETTER](#)]

[See [FIVE COUNTY COMMUNITY ACTION GRIEVANCE PROCEDURE](#)]

STAFFING THE CASE

The first part of staffing the case is meeting with the client to make sure that all paperwork, pertinent questions, and other needed information has been collected and is correct. This is done as a part of the interview process and as the client delivers or sends in information and documentation for the case.

The second part of staffing the case is the process of getting approval or redirection for the client **once all required paperwork has been filled out**. The case manager can sit down with the staffing team and 'talk over' the case. Any loose ends, possible referrals, & problems will be reviewed and discussed. The appropriate funding source and funding availability will also be examined during staffing.

APPROVAL OR ACCEPTANCE

Once intake is complete and the client is deemed eligible for services, they are contacted by the Community Action Case Manager within three (3) business days after intake is completed. The case manager will help work with the client toward setting goals and what paperwork or information is needed to submit a check request for funding. Not all assistance is just financial. The case manager's focus can be on whatever the gap is: education, poverty or whatever barrier there is between the client and self-sufficiency and/or economic security.

The initial interview is important. Our goals are to meet service gaps in the community, move clients towards self-sufficiency and economic security. COC and ESG grants also serve the most vulnerable clients first (to the extent permitted by grant funding). FCAOG CAP strive to avoid duplicating services. These steps include (but are not limited to): eligibility, assessment, availability of programs, and linkages to other programs.

Availability of Programs

Another important thing to remember is that the support and aid is limited by the type of funding available. It depends on the funding source, and the stipulation that they have on the funds. Grants and grant requirements change frequently. As a result, particular services may be more available at sometimes more than others.

Linkages

Linkages are an essential component of eligibility screening, regardless of funding availability and the client's fit with programs. When clients are accepted into Five County Community Action programs, referrals become an essential part of receiving "wrap around services." When case managers work with other agencies effectively, the client has access to additional resources and supports which Five County alone cannot provide. Remember, there are no "Five County clients" but rather members of local communities which can be served by multiple agencies. It is best practice for the case manager to do a "warm-hand" approach, when available (see This is from "Coordinated Entry Core Elements" at

<https://www.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>, page #55). In this model, the referral is more than just handing people off or providing them a list of places to go and providers to contact. This approach requires the referring agency to contact the agency that was referred, along with any pertinent information required for their intake/eligibility. In some cases, a follow-up might be necessary to help the person connect with the receiving agency and/or complete necessary paperwork. Another great example of a warm hand approach referral is for the case manager to contact the receiving agency, talk with them about the client (with the client present) and set up an appointment that works for the client. Best Practice is for the case manager to follow up with the client after the appointment to make sure everything went smoothly. When providing referrals to housing areas, case manager is prohibited from steering people towards certain neighborhoods because of race, color, national origin, religion, sex, disability, or the presence of children. Best practice is for the housing referral process to provide potential participants with a list of all available units and projects for which they likely are eligible and then support them in making their own choices about which option(s) to pursue. (This is from "Coordinated Entry Core Elements" at <https://www.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>, page #49)

Information and referral to other community agencies is equally important for clients who do not fit into eligibility criteria with Five County. Lack of eligibility does not negate applicant needs and Five County staff should be as knowledgeable of community resources as possible. Often clients may receive better service by working through community partners. This is a positive way to help them by giving them a direction and contact information of where they may still be able to get assistance. This is a linkage.

Some programs consider eligibility screening an administrative function. When linkages are provided as part of the eligibility assessment, less time will be considered administrative. Clients should also benefit, whether they were accepted into Five County programs or not.

Linkages should be tracked and recorded into CAP60. When no follow up occurs the service(s) will be considered information referrals (I&R); when referrals are followed up on, outcomes will be recorded and not considered information and referrals.

REFERRALS

This is not necessarily the end of the relationship with the client. A major part of the services that are offered are from linkages and referral.

These are all used as ways to allow the continuation of help for those in need. When FCAOG CAP are unable to help someone FCAOG CAP can still help them with a direction toward possible help.

INDIVIDUALIZED PLAN

With the differences between clients being so different it is most effective to put together an individualized plan. This will allow each case to be focused on the specific needs of the client. A case plan is important and created mostly by the client. The client and case manager will have a conversation about the client's goals for progression. As FCAOG CAP case managers prepare a case plan, they look at the details, the holistic view, not just the service the client came in seeking. We need to evaluate their progress and how to adjust their goals. FCAOG CAP case managers may also be looking at the Department of Workforce Services MyCase reports as well as if they are on food stamps or any other type of government aid. All of this information will help us to keep the plan more effective.

Whether the case manager uses the AZ Matrix or the VISPDAT/SPDAT as the assessment, 3 focus areas should be chosen by the client to improving on.

[See Form [Housing Stabilization Form](#)]

[See Form [AZ Matrix](#)]

[see Form [VISPDAT](#)]

[see Form [SPDAT](#)]

Case Notes

An important part of the first meeting with the client is documenting notes in the "case notes" section in CAP60 (search client, select case, select case notes). FCAOG staff members will update the case notes with every client interaction including follow-ups after the case is closed, keeping record of every contact that the FCAOG CAP staff has with the client. Then the case manager will make sure the case notes are up to date and print out a copy (from CAP60 with the client's information in the header) and sign them (the last page of the case notes).

Case notes will be printed and added to the digital and physical client file once the case is closed (after 180-day follow-up is completed). Clients in all programs except the Hurricane Valley Food Pantry and VITA should have case notes.

General Guidelines for case notes are:

- Staff will record every contact (i.e. phone call, emails, staffing, funding).
- Staff will not include information they have not shared with the client(s). This is the client's record, and they have every right to request to read it.
- Staff member completing the case note is legally responsible for the accuracy and quality of the service(s) that were provided. It is best to have all staff members just add to the same case notes in CAP60 (so they are in one location).
- Staff will print case notes when the case is closed and add the signed case notes to the client file.
- Staff will sign their complete name and job title at the bottom of the last page of the final draft of the case notes.
- Staff will not use ditto marks on the case notes
- Case notes should not have any blank lines in the middle of the entry.
- Staff should be exact in noting the full date (including year), length of visit/contact, type of contact (home, office).
- Staff will avoid general words like "thing", "she/he", "there". Describe the subject, location, event every time.
- It is best practice to write the date and length of visit/contact on the case notes with each contact.
- Use only standard abbreviations/acronyms. Staff may use personal abbreviations if it is defined in the case notes prior to using the abbreviation/acronym.
- Staff will use spell check.
- Do not erase/white out the final case notes. Just cross through it, initial it, and write in the correction.
- Include phone calls, voicemails, emails, staffings, mailings, etc. Even when the staff does not respond back that information may still be important.
- Black or blue ink is preferred for signatures

[See Form [HOUSING STABILIZATION PLAN](#)]

Grievance

Five County Community Action Grievance Procedure

To assure those clients experiencing concerns, problems, etc. with any Community Action program may seek resolution in an equitable, non-punitive manner and with no adverse repercussions to the client and/or his/her status in any of the Community Action programs. Client must be offered the grievance procedure in the application. There must be an option for the client to sign the grievance procedure on the application, as well.

- a. Clients shall have the opportunity to express themselves regarding problems they are having with the program without being subject to any adverse action.
- b. The grievance process shall not interfere in any way with the client's status in the program, or with other aspects of the program.
- c. There shall be an appeal process that exists independently of the specific program activity that is the subject of the grievance, and shall have various levels of appeal
- d. Client's grievances must be transmitted without alteration, interference, or delay to the party responsible for receiving and investigating it.
- e. Attempts will be made to resolve grievances as quickly as possible.
- f. If the client perceives themselves as subject to substantial risk of imminent sexual abuse, they may verbally contact or file a grievance immediately with any administrative staff of Five County Association of Governments.

Five County shall inform DWS when a grievance is filed.

Grievance Policy

Notice to the Applicant [24 CFR 982.554(a)]

- Five County AOG gives an applicant prompt notice of a decision denying assistance. The notice contains a brief statement of the reasons for the decision, and states that the applicant may request a hearing. The notice describes how to schedule a hearing.
- Five County AOG will evaluate the following matters:
 - Whether or not the grounds for denial were stated factually in the Notice.
 - The validity of grounds for denial of assistance. If the grounds for denial are not specified in the regulations, then the decision to deny assistance will be overturned.
 - The validity of the evidence. Five County AOG will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, Five County AOG will uphold the decision to deny assistance.
 - If the facts prove the grounds for denial, and the denial is discretionary, Five County AOG will consider the recommendation of the person conducting the hearing in making the final decision whether to deny assistance.
 - If the decision to deny is overturned because of the hearing, processing for admission will resume.
 - If the applicant fails to appear for their hearing, the denial of admission will stand, and the family will be so notified.

Homelessness Programs

Rapid Re-housing (State Homelessness Funding and Continuum of Care)

Introduction

Five County operates a freestanding rapid re-housing program, which means that it does not directly operate a rapid re-housing program associated with a shelter. In a community where the length of stay in shelters is rising and many homeless people are being turned away, it is Five County's hope to work with shelters to house clients. The desired impact is to help homeless clients work towards self-sufficiency while freeing up shelter beds.

All ESG grants should comply with 24 CFR part 576 and the Utah ESG Policy and Procedure Manual. All Continuum of Care funds should comply with 24 CFR 578, Utah Balance of State Policies and Procedures manuals, Local Tripartite Board requirements (Five County Human Services Council), and the Community Services Block Grant (CSBG) organization standards.

Upon request, any client can receive the most recent approved FCAOG CAP Policies or their case file.

Five County AOG has established and maintains standard operating procedures for ensuring that RRH funds are used in accordance with the requirements of the grant, including:

Moves for victims of domestic violence, dating violence, sexual assault, and stalking

For each [program participant](#) who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under [§ 578.51\(c\)\(3\)](#), Five County AOG will retain:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the [program participant](#)'s case file. This may be written observation of the housing or service provider; a letter or other documentation from a [victim service provider](#), social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the [program participant](#) to whom the violence occurred or by the head of household.
- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a [victim service provider](#), social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the [program participant](#) to whom the violence occurred or the head of household.

[see Emergency Transfer Plan]

Length of Assistance

According to HUD guidelines, rapid re-housing funding sources provide short and medium-term rental subsidy. Each case should be determined separately, but the length of assistance may not exceed 2 years, or exactly 24 months of assistance. Enrollment into the housing grant begins once intake is complete.

Enrollment will be entered in HMIS and CAP60. Exits will also be entered into HMIS and CAP60, with a slight difference: HMIS will have the exit date of when the client is exited from the program. CAP60 will have the exit date 180-days after the HMIS date, to track that COC wasn't funding a staff person longer than the 6 months after exit time.

However, there may many clients able to achieve self-sufficiency prior to 2 years. After a client recertifies for an extension (any funding past 12 months of assistance- Annual Recertification), their case is taken 3 months at a time to see if the assistance is something they still need. After 12 months, the case is taken on a case-by-case basis.

Annual Income

For each [program participant](#) who receives housing assistance where rent or an occupancy charge is paid by the [program participant](#), Five County AOG must keep the following documentation of annual income:

- Income evaluation form specified by HUD and completed by Five County AOG; and
- Source documents (*e.g.*, most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the [program participant](#) and income received before the date of the evaluation;
- To the extent that source documents are unobtainable, the intake worker must first seek evidence from third-party (HMIS or letter from other homeless provider). If not available, the intake worker observations, written down are acceptable. If these two previous verification methods are not obtainable, the applicant (person seeking assistance) may provide a written statement [see self-declaration of housing form] 24CFR578.103a4

Program Participant Records

In addition to evidence of "homeless" status Five County AOG must keep records for each [program participant](#) that document:

- The services and assistance provided to that [program participant](#), including evidence that Five County AOG has conducted an annual assessment of services for those [program participants](#) that remain in the program for more than a year and adjusted the service package accordingly, and include case management services as provided in [§ 578.37\(a\)\(1\)\(ii\)\(F\)](#)

Housing Standards

Five County AOG retains documentation of compliance with the housing standards in [§ 578.75\(b\)](#), including inspection reports.

- **Services Provided-** Five County AOG documents the types of supportive services provided under the RRH program and the amounts spent on those services. Five County AOG keeps

record that these records were reviewed at least annually and that the service package offered to [program participants](#) was adjusted as necessary.

- **Match-** Five County AOG keeps records of the source and use of contributions made to satisfy the match requirement in [§ 578.73](#). The records indicate the grant and fiscal year for which each matching contribution is counted. The records also show how the value placed on third party in-kind contributions was derived. To the extent feasible, volunteer services are supported by the same methods that Five County AOG uses to support the allocation of regular personnel costs.
- **Conflicts of interest-** Five County AOG keeps records to show compliance with the organizational conflict-of-interest requirements in [§ 578.95\(c\)](#), the Continuum of Care board conflict-of-interest requirements in [§ 578.95\(b\)](#), the other conflict requirements in [§ 578.95\(d\)](#), a copy of the personal conflict-of-interest policy developed and implemented to comply with the requirements in [§ 578.95](#), and records supporting [exceptions](#) to the personal conflict-of-interest prohibitions. **[see staff certification form]**
Conflict of Interest with tenant and landlord could also arise. Landlord signs a statement of conflict of interest when providing unit information for possible funding. **[see Deposit or Housing assistance Landlord Agreement]**
- **Affirmatively Furthering Fair Housing-** Five County AOG maintains copies of their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in [§ 578.93\(c\)](#)

Low-Barrier Housing

Five County AOG rapid re-housing policies should reflect the policies set forth by funders (including US Department of Housing and Urban Development), the Utah Homeless Coordinating Committee, the Utah Balance of State, and local LHC addendum.

These are the current low-barrier principles which will be followed when serving homeless clients enrolled in state and HUD-funding rapid re-housing programs:

- Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or other unnecessary conditions.
- Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy and building and apartment units include special physical features that accommodate disabilities.
- Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- Housing and service goals and plans are highly tenant-driven.
- Supportive services emphasize engagement and problem-solving over therapeutic goals.
- Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental

communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.

- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements. When payment plans are scheduled, the client must pay their rent by the 5th of every month.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy or safety is in jeopardy. Whenever possible, eviction back into homelessness is avoided.
- In situations where the client has been previously funded with Rapid Rehousing funds and they're back on the HMIS By Name List (to possibly be chosen for more Rapid Rehousing funding), FCAOG will not re-fund households that:
 - Were exited from their Rapid Rehousing case:
 - Home visits were waived during the case
 - A violent crime was committed during the case
 - Case Manager observed what appeared to be illegal activity in the home (such as the sale or manufacturing of drugs, a significant safety concern, guns or any weapons, or any inappropriate nudity)

Fees for Services

In support of rapid re-housing, no enrolled client will pay a fee for service for any Five County service. The only allowable exception to this rule is for rapid re-housing clients to share their portion of rent to Five County. This project income may be documented as match and must be deducted from the grant reimbursement.

Match Sources & Uses

- Five County AOG matches all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources.
- Cash Sources
 - Five County AOG may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as [State](#), local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match. Five County AOG will ensure that any funds used to satisfy the matching requirements are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under this program.
- In-Kind Contributions
 - Five County AOG may use the value of any real property, equipment, goods, or services contributed to the [project](#) as match, with the [exception](#) of § 200.306(b)(5).
 - Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between Five County AOG and the third party that will provide the services.
 - The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided.

- During the term of the grant, Five County AOG will keep and make available, for inspection, records documenting the service hours provided.

Coordinating with Emergency Shelters and Other Human Service Providers

All rapid re-housing funding should be coordinated to support transitioning households from emergency shelters and providing linkages to other services which will increase self-reliance. Some can be provided within Five County Association of Governments (such as HEAT, Weatherization, and Aging Services) while many services must be coordinated with outside agencies. It is expected that Five County staff will coordinate services appropriately.

“Side-dooring”

Side-dooring is the practice of trying to bypass coordinated entry procedures and LHCC/COC-specific policies in place to ensure coordination of services. If any Five County staff deliberately engages in the practice, they will be subject to disciplinary action.

HEARTH-ACT Coordination

All staff working with rapid re-housing grants are required to comply with HEARTH Act requirements. As part of intake, those Heart Act questions and coordination must always occur for parents with school age children in the case.

Eligibility

Currently Experiencing Homelessness

The client must meet the Category 1,3, or Category 4 – Literal Homelessness definition of homelessness as defined by HUD to qualify for COC Rapid Re-housing funding. For ESG RRH, clients must meet 1 or 4 and live in an emergency shelter or a place described in paragraph 1 on link below:

https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

(see definitions sections for definition of Category 1, 3, and Category 4 of “Homeless” definition)

- **Not Eligible for other Rental Assistance Programs** - Five County cannot use state homeless or COC funding to pay for section 8 rent or to duplicate any other subsidized rental assistance program (this does not apply to Section 42 Housing which is a developer tax credit rather than direct client rental assistance). Five County will also not use homeless funding to pay utilities paid for by HEAT. In short, there will not be double-charged assistance in the rapid re-housing programs.
- **Most Vulnerable/Prioritization** - All clients must come from the top of the Community Housing list in the Homeless Management Information System. If a client declines the funding or doesn’t complete the full intake (within 30 days of the date they were chosen at the coordinated entry), FCAOG staff is to report that to their coordinated entry group to choose another candidate for the spot. Additionally, declining an invitation or having exited a program in the past do not constitute reasons to deny enrollment to clients. Five County AOG will comply with state and local coordinated entry procedures and will not allow deliberate attempts to side-door the coordinated entry process. If staff member does not comply with the correct coordinated entry process, disciplinary action will result.
- **Homeless Status Verification** - Five County AOG maintains and follows written intake procedures to ensure compliance with the homeless definition in 576.2 Procedures require documentation at intake of the evidence relied upon to establish and verify homeless status.

HOMELESS – DEFINITIONS (24 CFR § 576.2)

Category 1 – Literal Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation (car, park, abandoned building, bus or train station, airport, campground); or
- 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 programs); or
- 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

Category 2 – Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

Residence will be lost within 14 days of the date of application for homeless assistance; AND

- No subsequent residence has been identified; AND
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless under other Federal statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under the other listed federal statutes, AND
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; AND
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days of application; AND
- Can be expected to continue in such status for an extended period of time due to special needs or barriers of:
 - chronic disabilities, or
 - chronic physical health or mental health conditions, or
 - substance addiction, or
 - histories of domestic violence or childhood abuse (including neglect), or
 - the presence of a child or youth with a disability, or
 - two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4 – Fleeing/Attempting to Flee DV

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a 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; AND

- Has no other residence; AND
- Lacks the resources or support networks *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing

Chronic Homeless

The definition of Chronic Homeless is an unaccompanied homeless individual with a disabling condition who has been continuously homeless for 1 year or more, OR has had at least four episodes of homelessness in the past 3 years, where the cumulative total of the four occasions is at least one year. <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

A disabling condition is defined as:

- A disability as defined in Section 223 of the Social Security Act
- A physical, mental, or emotional impairment which is expected to be of long-continued and indefinite duration, substantially impedes an individual's ability to live independently, and of such a nature that the disability could be improved by more suitable conditions
- A developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act
- The disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agent for acquired immune deficiency syndrome, or
- A diagnosable substance abuse disorder

The term homeless in this case is the Homeless Definition of Category 1,3, & 4 as defined by HUD. Best practice is to also go through the timeline with the client once the case manager figures out the client meets the chronic homelessness definition.

(see forms for WA Co - [Chronic Homelessness Documentation & Timeline](#))

(see forms for WA CO CE P&P - [Local Addendum](#))

AT RISK OF HOMELESS – DEFINITION (24 CFR § 576.2)

Category 1 – Individuals and Families

An individual or family who:

- Has an annual income below 30% of area median family income for the area; AND
- Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
- Meets at least one of the following 7 conditions:
 - Has moved because of economic reasons 2 or more times during the 60-days immediately preceding the application for assistance _
 - Is living in the home of another because of economic hardship
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals_
 - Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room

- Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution) _
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the sub recipients approved Con Plan

Category 2 - Unaccompanied Children and Youth

A child or youth who does not qualify as homeless under the homeless definition but qualifies as homeless under another Federal statute.

Category 3 - Families with Children and Youth

An unaccompanied youth who does not qualify as homeless under the homeless definition but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with him or her.

Section 725(2): Children and youth who have 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.

[At a Glance Criteria for Definition of At Risk of Homelessness \(hudexchange.info\)](https://hudexchange.info)

Documenting Client Eligibility for Rapid Rehousing

There is a requirement that the eligibility of all program participants be collected before acceptance into a rapid re-housing program. To meet this requirement, documentation should be gathered at intake and follow the prescribed order of documentation and the forms/supporting documents must be complete. The preferred order of documentation is: 1) Third-party Verifications, including written and source documentation, and HMIS records; 2) Intake worker observations, certified in writing and retained in client file; 3) Self-Certification from persons seeking assistance with documentation of the intake worker's efforts to obtain third-party verification and reasoning why it was not able to be obtained. Once the documentation of homelessness has been received, Five County staff will complete the Homeless Certification – Category 1, 3, or 4 form and the Staff Certification of Eligibility form (case manager and department head will sign this). Case manager should complete the Five County AOG Community Action Check List form to collect other pertinent, but not required, documentation.

Part of the Staff Certification of Eligibility includes a conflict-of-interest statement. If there are conflicts that exist between the program participant and/or the case manager or department head, those conflicts must be disclosed to the supervisor. A new staff member will be assigned to work directly with this program participant, if the conflict is with the direct staff. If the conflict is with the supervisor, the direct staff will work with the deputy director on any decisions made concerning this program participant.

When a client is chosen to fill a Rapid Rehousing spot, they have 30 days (from the date chosen at the coordinated entry meeting) to submit their complete application to the FCAOG intake staff member. The client may have to answer more questions than required with HMIS, but that's also so they can qualify

for other funding sources (CAP60 required questions) and any other services Community Action offers. Additional elements collected for non-UHMIS programs are not entered into UHMIS, and only the minimally required data elements are entered into UHMIS. Special circumstances can be staffed with the Community Action Director, when applicable.

Third-party verification using HMIS records has been the departmental preference since July 1, 2016. The department head will work with case managers to ensure due diligence in obtaining this documentation.

[Examination of Income](#)

Income is calculated in accordance with 24 CFR 5.609 & 24 CFR 5.611 (a) Five County AOG examines the household income initially, and if there is a change in family composition (e.g. birth of a child) or a decrease of the household income during the year, the client may request an interim reexamination, and the occupancy charge will be adjusted accordingly. The client may also request to have their income examined again (to decrease their rental portion) if their monthly income decreases.

[Related Individual](#)

The term 'related individuals' means two or more persons related by birth, marriage, and/or adoption who reside together.

[Unrelated Individual](#)

The term unrelated individual means an individual who is not an inmate of an institution: (1) who resides alone or (2) who resides with one or more persons who are not related to him/her by birth, marriage, and/or adoption.

(see forms for [Self-Declaration of Housing status](#))

(see forms for [Homeless Certification](#))

(see forms for [Staff Certification of Eligibility](#))

(see forms for [Check List w HEARTH ACT](#) for FCAOG Community Action)

Units approved for Rapid Rehousing Funding

Environmental Review Policy

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it complies with the National Environmental Policy Act (NEPA) and related laws and authorities. All HUD-assisted projects are required to undergo an environmental review to evaluate environmental impacts. The analysis includes both how the project can affect the environment and how the environment can affect the project, site, and end users.

An environmental review must be performed before any funds, regardless of source, are committed to a project.

Documentation of the environmental review should be maintained in the environmental review record. This record contains the description of all activities that are part of the project and an evaluation of the effects of the project on the human environment and vice versa. This record should be made available for public review.

When conducting an annual Environmental Review, it is important put the following exception on the document:

We are requesting a determination of 'Supplemental Assistance 'for this project (24CFR 58.35 (b) (7) This project does not trigger any environmental issues because it does not involve construction of

any kind and will have no negative impact on surrounding environment. HUD's LBP regulations do not apply to hotel stays, RRH projects, or homeless shelters, so no action regarding LBP is required for this type of project.

Housing Criteria

Inspection (Housing Quality Standards-HSQ)

Before any assistance will be provided on behalf of RRH, Five County AOG will physically inspect each unit to assure that the unit meets HQS (initial home inspection) and Lead-Based Paint requirements. Assistance will not be provided for units that fail to meet HQS and Lead-Based Paint requirements, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and Five County AOG verifies that all deficiencies have been corrected. Five County AOG will inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

While the case manager works on obtaining all the necessary documents from the participant, a home inspection will be scheduled with the client. The inspection will follow the same guidelines (Housing Quality Standards) that were used prior to move in.

Rent Reasonableness

All units must meet Rent reasonableness. State Homelessness funding must also meet Fair Market Rent. A Rent Reasonableness form must be completed on each funded unit with 3 other comparable units documented with the form. If the landlord owns other comparable units, they must submit proof that the other units are the same cost as the funded unit. No unit will be funded without this proof.

If the landlord requests a rent increase, the Five County Association of Governments Case Manager will complete a Rent Reasonableness Form to determine whether the new rent is reasonable and if it falls within the FMR payment standard. Five County AOG will only provide rental assistance for units if the rent is reasonable. Rent Reasonableness forms must be completed regardless if the rent is at or below the fair market rent. Five County AOG determines whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for other comparable units. Reasonable rent cannot exceed rents currently being charged by the same owner for comparable unassisted units. When completing the Rent Reasonableness form, Five County staff will include, on the form, other rentals (with amounts being charged) by the same landlord for unassisted units. If the owner/landlord does not own any other properties, using a google search (Zillow, apartments.com, etc.) is allowed.

Rent Adjustment(s)

When a client moves into their unit, income is collected from the 15th of the month to the subsequent 15th of the month (i.e. move-in 01/01/2024, income collected will be 11/15/2023 – 12/15/2023). That income is input into HUD's HOPWA Rent Calculator. This sheet determines the highest of the two:

- 30% of Gross Income
- 10% of Adjusted Gross Income

If the participant reports a decrease in income, the Five County Association of Governments Case Manager will perform a revised rent calculation. If the client's income increases, the case manager will work with the client on a stabilization plan for that extra money. If the landlord's rent increase is denied because it is not reasonable, does not fit within the FMR payment standard, or because the unit doesn't pass the home inspection, the landlord and the client will be notified to explain the basis for the unit denial. If the landlord states they can get the unit to pass the home inspection, due time will be given to the landlord to do that. If the landlord or client wishes to enter into another lease, a new lease and contract will be generated and signed and submitted to Five County Association of Governments – Community Action. The landlord may choose to sign a new lease and contract after initial lease expires, but it is not required. An initial 12-month lease is required. If the client is re-housed, a rental agreement

is required, but doesn't have to be a 12-month lease. For clients who satisfy the 12-month lease, stay in their unit, and have a month-to-month lease ongoing needs to have documentation of that agreement with the landlord in the case notes.

[see <https://www.hudexchange.info/resource/1835/hopwa-income-resident-rent-calculation/>, click on [Income Resident Rent Calculator \(XLSX\)](#)]

[see [FY HUD Fair Market Rent Amounts form](#)]

Health and Safety Standards

Units must meet basic health and safety standards to be eligible for the housing subsidy of rapid re-housing. Inspections may be completed by Five County AOG staff or authorized sub grantee recipients that have completed the Lead-Based Paint Training on the HUD website and be certified.

[see <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm> for training]

Lead Paint Inspection

In some instances, HUD requires LEAD Paint checks to be conducted and for clients to be given information about LEAD Paint. The Lead Based paint inspection sheet must be completed and any needed corrections must be satisfactorily completed prior to funding. All clients moving into a unit that was constructed prior to 1978 must be given the Protect Your Family from Lead Based Paint pamphlet in their preferred language (when available). The English version of that pamphlet can be found at <https://www.epa.gov/lead/protect-your-family-lead-your-home-english>

This packet will be attached to the Renter Toolkit to be given to the client prior to move-in.

24 CFR 578.75(b) (noting specific activities and relevant sections of 24 CFR part 35) " 24 CFR 578.99(f) (requiring CoC-funded programs to comply with requirements in 24 CFR part 35, subparts A (disclosure), B (general requirements and definitions), H (project-based assistance), J (rehab), K (acquisition/leasing/support services/ operation), M (tenant-based rental assistance), and R (methods and standards for evaluation and reduction)); 24 CFR 578.103(a)(15) (requiring documentation of compliance)

Fair Market Rent (for reference)

Fair Market Rent is determined by Housing and Urban Development (HUD). Five County AOG COC Rapid Rehousing programs utilize rent reasonableness rather than being restricted to Fair Market Rent. However, these numbers are still important in determining budget and determining instances where rent reasonableness is not met.

Both Fair Market rent and Rent reasonableness is used on all units for COC and ESG programs even if the unit is at/below Fair Market Rent.

Fair Market Rents

Fair Market Rents can be viewed on the HUD website at:

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2021_code/select_geography.odn?data=2020&fmrtype=%24fmrtype%24

Client Choice

Clients are to have as much say in their housing as possible. Although Fair Market rent and housing reasonableness must be followed for Unified Funding (ESG/PAHTF) and COC funding, clients must be

listened to and have as much participation in housing as possible. COC does allow clients to live in a rental that exceeds the Fair Market Rent as long as they agree to work toward affording the rent.

Unit Affordability and Reasonableness

Once approved for Five County Association of Governments – Community Action (FCAOG CAP) Rapid Rehousing funding, the client and the case manager can start actively applying to rentals. To have the rental funded by Rapid Rehousing, all of the following criteria must be met.

1. With COC funding, the rental should be priced around the Fair Market Rent (FMR) range. When the case manager and client are unable to find a rental with that price range, a Rent Reasonableness and Fair Market Rent Certification form will be completed and stored in client file to show that other, similar units are priced over the Fair Market Rent and the rent is reasonable for the desired rental. (see definitions section for “Fair Market Rent”)
 - a. To calculate utility allowances on the “Rent Reasonableness Form”, use this as a general guide:
 1. 3-bed units = \$125.00 a month for utility allowance
 2. 2-bed units = \$100.00 a month for utility allowance
 3. 1-bed units = \$75.00 a month for utility allowance
 4. Studio unit = \$50.00 a month for utility allowance
 5. Room rentals = \$30.00 a month for utility allowance
 - b. For units that include utilities in the rent, the client is to pay the above amounts (i.e. for a 3-bed unit it’s \$125.00) back to the grant every month on top of the rental portion. However, this utility amount can be deducted from the client’s rental portion.
2. We generally encourage 2 occupants per room and no more than one room per person. According to the Utah Fair Housing Act, a landlord cannot restrict fewer than two individuals per bedroom. Here are some general guidelines to assist clients when searching for housing.
 - a. 2 people per room if a couple
 - b. 2 people of same gender/room—if no more than 12 years in age difference.
 - c. 2 people of opposite gender/room—if both children are 5 years of age or younger.
 - d. A den or living room may be considered a room when necessary.
 - e. Funds will not be used for units that are larger than a family needs unless otherwise determined by case managers and FCAOG staff.
3. This rental should be around the amount the client/household will be able to afford at the end of the program. If it is currently not affordable, there is an expectation that the client will increase their income to afford the rental. Generally, the case manager informs the client to plan on paying around 30% of their income and full utilities, starting the second month of rent (if they move into their unit before the 17th of the month, in which the 3rd month is when client rental payments start). The client is expected to pay their own utility bills, however, it can be deducted from the client’s rental portion (with a utility receipt). The case manager will also work with the client to apply for H.E.A.T assistance strategically during Rapid Rehousing funding.
4. The client (and all household members) must be on a lease (12 months) initially, signed by the owner or property manager. No subleasing is allowed.
 - a. Best practice is to have all new household member’s information within 90 days of when that household member moves into the funded unit. This includes the new household member’s income (15th of the month to 15th of the month)

5. Once the client accepts a COC spot (i.e. 1-bedroom, 2-bedroom, or 3-bedroom unit) they cannot move into a more expensive, larger unit unless:
 - a. There's a change to the permanent household size.
 - b. Household size qualifies for a larger unit (in cases where client accepts a lower bed unit b/c it's available and plans to move into something bigger when the bigger spot becomes available).
 - c. To stay in the current unit spot: The unit they are asking for, even if it's one room larger, is below the fair market rent for their approved spot (Ex: Sally was in a 1-bed spot but is requesting a 2-bed unit that's open. The unit is \$615.00 a month, which is below the 1-bed fair market value of \$717.00 a month).
 - d. To increase their unit they have to wait until the larger unit spot opens. Priority will be given to current clients versus pulling from the HMIS by-name list) when filling empty spots.
6. If there's a situation where the adults in the household are separating and requesting to receive continued funding:
 - a. Individual SPDAT: The adult that was chosen for the Rapid Rehousing spot will continue to receive the Rapid Rehousing funding. The other adult will have one of these options:
 - 5) The 2nd adult will be offered to have a SPDAT done (if literally homeless still) and placed onto the HMIS By Name List.
 - 6) The 2nd adult (if literally homeless still) will be offered a Rapid Rehousing spot in FCAOG (if spots are available).
 - 7) The 2nd adult (if not literally homeless) will be informed of other resources out there (i.e. CSBG deposit assistance, etc.)
 - b. Family SPDAT: The adult household member who is keeping the kids in their home will receive continued rapid rehousing funding.
 - 5) If both adult household members are sharing the kids (i.e. 50%/50%). Both adults will be offered to have individual SPDATs completed on them. The person with the highest SPDAT will receive the continued Rapid Rehousing funding. The other adult will have one of these options:
 1. The 2nd adult will be offered to have a SPDAT done (if literally homeless still) and placed onto the HMIS By Name List.
 2. The 2nd adult (if literally homeless still) will be offered a Rapid Rehousing spot in FCAOG (if spots are available).
 3. The 2nd adult (if not literally homeless) will be informed of other resources out there (i.e. CSBG deposit assistance, etc.)
7. If there's a situation where the client is requesting to move to another county within the five county area. That is acceptable if there is an open spot in that county. Priority will be given to current clients versus pulling from the HMIS by-name list) when filling empty spots.

Unit Conflict of Interest Exceptions

HUD generally prohibits conflicts of interest with lease agreements, such as family relationships between landlord and tenant, but does allow certain limited exceptions. When renting from in-laws or Family Members, grantees must present compelling evidence demonstrating that the unit had a pre-existing status as a rental unit before being rented out to a family member. This evidence should

emphasize the unit's rental history and substantiate its status as a bona fide rental property before its occupancy by a family member.

Grantees may submit a variety of supporting documents and materials to help establish the unit's rental history:

- **Rental Agreement and Lease Records:** Past rental agreements outlining terms, duration, and payments from previous tenants (e.g., signed leases from prior tenants with payment receipts). Before submission, all personal and confidential information must be appropriately redacted to safeguard the privacy of the individuals involved.
- **Advertisements and Listings:** Display ads from various sources that marketed the unit for rent (e.g., online listings, newspapers, showcasing features and availability).
- **Financial Records:** Bank statements or financial records showing rental income deposits (e.g., bank statements with consistent payments to a rental account).
- **Property Management Records:** If applicable, share reports from property management detailing rent, maintenance, and turnover (e.g., management reports covering rent collection and maintenance).
- **Tax Filings and Deductions:** If relevant, include tax return copies showing rental income and deductions (e.g., tax returns with reported rental income and related deductions). By presenting a combination of these types of evidence, grantees may effectively establish the unit's preexisting status as a rental property, meeting the requirements set forth by In-Law or Family Members.

Approval of renting from In-Law or Family members is entirely within OHS discretion. OHS must be informed of any possible funding for units that want to apply for an exception before any funding occurs.

The main goal of RRH is for the client(s) to obtain and sustain housing with the understanding that the client(s) will complete home visits, not violate their lease, and pay their portion of the rent (30% of client income). If any of these do not occur, the client(s) may lose their funding. Five County strives to avoid creating dependency while empowering clients to achieve their potential. Case Managers will have ongoing conversations with the client about satisfying their lease requirements to avoid eviction and making and achieving goals the client has set for themselves. FCAOG CAP strives to help the clients build a habit of prioritizing their housing, therefore, funding normally requires the client to pay a portion of their income toward their rent.

It's important for the client to be aware that their case can be closed if there has been no contact for 30 days between the case manager and the client. The case manager must document (in case notes) all attempts at contacting the client for case management. Contacts can be through phone, email, home visits, or case managers/therapists at community agency/agencies.

(see forms for [RENT REASONABLENESS AND FAIR MARKET RENT CERTIFICATION](#))

Case Plan

A case plan is a basic goal setting sheet to keep track of what FCAOG CAP is doing with a client. It shows the basic information and goes through what the plans focus is. It will also help to break up the plan into more attainable parts. The plan should be created and entered into HMIS within 30 days of

enrollment date. The plan should help track what the client is doing, and how much they are getting done. The final part of the plan holds them accountable and helps them take ownership by having them sign and date their agreement. It is important to make sure that case management is used to follow up with clients on a regular basis to review the case plan. In this template are a few examples of what can/has been done in an actual case plan.

Housing Stabilization Plan

For rapid re-housing programs, emphasis is placed on housing stabilization plans rather than case plans. This connotes the notion of housing first which is not applicable to all department or agency programs. These plans cannot remove a client from housing due to non-compliance. It also reinforces housing stabilization as the first step towards self-sufficiency.

Client Participation / Engagement of persons with Lived Experience

Within rapid re-housing and all other Community Action programs, clients should have “maximum feasible participation” in interactions with the department and agency. Rapid re-housing clients should have strong input into their housing stabilization goals and living situations, be invited to participate in policy decisions (such as the CSBG tripartite board [a.k.a. Human Services Council] or EFSP board), and have access to customer satisfaction surveys. Clients should also be empowered to understand the grievance process at the beginning of enrollment (see FCAOG application). Clients must agree to meet with a case manager at least once a month (see 24 CFR [§ 578.37\(a\)\(1\)\(ii\)\(F\)](#) and 24 CFR [§ 576.01\(e\)\(1\)\(i\)](#)) **(See Case Management Plan for more information)**

Hard-to-house populations

Five County AOG exercises judgment and examines all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

Clients Exiting vs Termination from Rapid Rehousing

Examples of when a client is exited from the program when they:

Exhaust the amount or length of time they can receive assistance

(e.g., such as reaching the 24-month limit for rental assistance). No funding can be provided after the 24th month of funding (enrollment date into the program is the first month, whether the client is housed or not).

Client agrees to close their case

Clients have the right to end participation in the program at any time. Client should provide verbal or written notice to case manager. In these instances, there will not be an appeal process.

No longer meet program eligibility requirements at re-evaluation

(e.g., such as exceeding income limits).

Client's rental responsibility exceeds rent amount

In instances where no subsidy can be provided, the client can be exited from program (although may have case management for six months afterwards).

Examples of when a client is terminated from the program when:

Client disappears

When the case manager is not able to connect with client (after making several attempts and noting it in the case notes) and the client has no known address and isn't responsive to emails or calls, the client will be exited with no exit planning.

Client violates program requirements or conditions of occupancy

Corrective Action Period with Terminations

If clients are not compliant with the program requirements, they must be presented the opportunity to correct these actions. The case manager must communicate with clients via two different mediums and provide 10 business days for clients to come into compliance (warning letter). The warning letter must fall on Monday through Thursday only at 5:00 p.m. only because the CAP office isn't open on Fridays for walk-ins. One medium must be certified mail sent USPS with the receiver being the client by check marking the "certified mail restricted delivery" on the certified mail slip (green) when the case manager has an address for that client.

If clients fails to satisfy the warning letter with the basic requirements of the program, they must be given a standardized termination letter/email/communication and provide information on the appeal process with a 10-business day deadline.

Any time a client is no longer being funded, after being funded, a termination letter (along with the appeal form) will be sent to the client.

Exceptions from this rule are when client(s) are no longer eligible due to AMI levels, when a client verbally agrees to close the case, or when the client disappears and the case manager has no known address for them. Case managers should help transition exiting clients as much as possible (although may have case management for six months afterwards).

Termination of assistance does not bar a recipient from providing further assistance to the same client at a later date ([§ 578.91\(a\)](#) and [§ 576.402\(c\)](#))

Exit planning

Whether exited or terminated, clients should be set up with an exit safety plan with emergency shelters and other agencies whenever possible.

When a client's case ends, the client can continue with case management for another 180 days. The exit plan sheet can be reviewed at these follow up conversations.

Due process

In terminating assistance to a program participant, Five County AOG will provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process consists of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; **[see consent to participate]**
- Written notice to the program participant containing a clear statement of the reasons for termination; **[see the [warning letter template](#) and [termination letter template](#)]**
- 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
- Prompt written notice of the final decision to the program participant.

Emergency Transfer Policy -24 CFR 578.7(d)

Emergency Transfers

Five County AOG is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), FCAOG allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of FCAOG to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether FCAOG has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Five County Rapid Re-Housing programs are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section or if they've already had a relocation.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify FCAOG's management office and submit a written request for a transfer to a different location with the region and possibly the state. FCAOG will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

- A statement expressing that the tenant reasonably believes that there is a threat of imminent harm of further violence if the tenant were to remain in the same dwelling unit assisted under FCAOG's program; OR
- A statement that the tenant was a sexual assault victim preceding the tenant's request for an emergency transfer. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm of further violence

Confidentiality

FCAOG will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives FCAOG written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the

dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about FCAOG's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

FCAOG cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. FCAOG will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. FCAOG may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If FCAOG has no safe and available units for which a tenant who needs an emergency is eligible, FCAOG will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, FCAOG will also assist tenants in contacting the local organizations aiding victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Generally, Five County AOG will only cover deposit and first/last month rent for one relocation. The exception to this rule applies to those covered by section 24 CRF 578.7(d), which in many instances will be those at risk of experiencing violence.

Service Animals

Definition

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA.

This definition does not affect or limit the broader definition of “assistance animal” under the Fair Housing Act or the broader definition of “service animal” under the Air Carrier Access Act. Some State and local laws also define service animal more broadly than the ADA does. Information about such laws can be obtained from the State Attorney General’s Office
http://www.ada.gov/service_animals_2010.htm

Guidelines

Where Service Animals Are Allowed

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go. For example, in a hospital it would be inappropriate to exclude a service animal from areas such as patient rooms, clinics, cafeterias, or examination rooms. However, it may be appropriate to exclude a service animal from operating rooms or burn units where the animal’s presence may compromise a sterile environment.

http://www.ada.gov/service_animals_2010.htm

Service Animals Must Be Under Control

Under the ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal’s work or the individual’s disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

http://www.ada.gov/service_animals_2010.htm

Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animals

When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person’s disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.

Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.

A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal’s presence.

Establishments that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.

People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.

If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.

Staff are not required to provide care or food for a service animal.

http://www.ada.gov/service_animals_2010.htm

Extra Deposits for Animals:

Service Animals

It is against the policies of Five County Community Action to pay extra deposits or fees for service animals because clients with legitimate service animals may not be asked for a pet deposit. In instances where Fair Housing is violated, the case manager should work with the client to find Fair Housing Enforcement resources.

Pets and non-service animals

Clients with pets rather than service animals may elect to have pets in their unit if it's not a lease violation, but will be asked to pay the difference in "pet rent" and "pet deposits" in addition to their rental portion amount each month. If this is not feasible, case managers should try to connect the client with resources to relocate pets on a permanent or temporary-basis. Ultimately clients may be facing a difficult decision, so case managers should approach this situation with as much sensitivity and problem-solving mind-set as possible.

Data Quality:

Client data may be input in real time or delayed process into UHMIS and CAP60 within 5 business days, data is looked at carefully and made sure that it is all completed and correct. The client determines which method of input is best for them.

In order to maintain great data quality, staff members are to complete quarterly data pulls and verification, with the goal of removing as many errors whenever possible.

All pertinent employees will complete the end-users training with HMIS within 60 days of hire date and gain access to HMIS. Until then, staff members that have HMIS access will input the new employees data until they have their own access. Staff members are not to share HMIS log in information. Only the agency staff who have completed all required training provided by the UHMIS Lead Agency or a UHMIS Lead Agency approved trainer will access UHMIS.

All authorized, current UHMIS end-users will complete the annual training, as required by HMIS. This allows all agency users to have continued ongoing access to UHMIS.

Accessibility:

All staff monitors need to be password protected. Log-in information is given to each staff upon hire. Staff are not to share log-in information. Monitors are to be locked when staff step away from them, even for a moment.

The HMIS Privacy Posting is to be hung in a room where those accessing services can see it (client meeting room, Community Action lobby, etc.)

Upon HMIS user leaving Community Action, the HMIS staff must be informed within 2 business days to remove their access. Any HMIS users that have left the agency must notify HMIS of the last work day so HMIS can remove their access from HMIS.

FCAOG continues oversight of anti-virus software and proper firewalls, ensuring it's monitored and updated automatically and frequently.

Quarterly ongoing data quality:

Quarterly reports will be ran and collected to go through and make sure all data is correct. If we find any errors, they will be looked at and corrected.

To ensure validity and quality of data, the following are steps to better ensure that:

1. Data is to be validated quarterly.
2. Data is to be validated at the end of the contract years or other reporting periods for each grant.
 - a. All reports are to be stored in the secure Community Action server in a separate folder named with the report and date it was pulled from HMIS.
 - b. Generate several reports from HMIS (such as "Clients In Programs" Report, "Data Quality Report", "APR", and "Service Summary" report.
3. Refer to client's paper application to fill in the gaps or if there is missing data. If data not collected, case manager is to contact the client and ask for the needed formation
4. After reviewing and correcting any issues found, regenerate the same reports you did in step 2(b), and verify that any errors have been corrected.

Accuracy:

The agency ensures the data it enters into UHMIS is accurate by:

1. FCAOG reviews all data collection documents annually to ensure they match current data collection standards.
2. FCAOG completes a quarterly data validation process to correct any inconsistent data.
3. FCAOG provides quarterly training on UHMIS standards to all UHMIS accessing staff.
 - a. Examples of data training include, but not limited to:
 - 1) Data issue correction
 - 2) deep dive on a specific data element
 - 3) data validation
 - 4) UHMIS use
 - 5) clarification of UHMIS expectations within the agency (i.e. services, programs, case notes)

Security:

A security incident is defined as the act of violating an explicit or implied security policy, including but not limited to:

- 1- A user caused intentional or unintentional sharing of data without explicit client consent. (e.g., emails containing client information or UHMIS accessed by an unauthorized user).
- 2- Attempts (either failed or successful) to gain unauthorized access to the UHMIS system or its data.
- 3- Unauthorized access to PPI due to misplaced, lost, or otherwise compromised access.
- 4- The unauthorized use of the system for the processing or storage of data.
- 5- Unwanted disruption or denial of service.

- 6- Changes to system hardware, firmware, or software characteristics without the owner's knowledge, instruction, or consent.
- 7- Unauthorized changes or disruptions to system hardware, firmware, or software.
- 8- Security incidents are fully defined in the UHMIS Standard Operating Procedures Section E.4 Security Incidents (see https://drive.google.com/file/d/1ZhIR_27cg3WEP18jVUp-hEHZaoek_9-A/view)

If a user notices or suspects a security breach, the user must immediately notify FCAOG Community Action's security officer or FCAOG Community Action Director. Security Officer will track all security incidents, the excel sheet is stored in the CAP server in the "HMIS" folder.

The FCAOG security officer maintains a log of all potential security incidents that involve UHMIS. In every case of a suspected incident, the FCAOG Community Action's security officer or director will conduct an internal investigation, then contact the UHMIS Lead Agency security officer to report the incident within 30 days of the incident occurring. If an incident has harmed or poses an imminent threat to a client or the database, FCAOG Community Action's security officer or director security officer will notify the UHMIS Lead Agency security officer immediately and follow all recommendations from them. Depending on the severity of the breach, the HMIS user may have their HMIS access revoked.

Monitoring of client files

Program manager will oversee client eligibility and ensure necessary paperwork is completed and stored in the client file in the server. A tracking sheet will be created for any client served throughout the funding year. Each digital file will need to include all monitoring items on the track sheet.

(see form [BLANK FCAOG Rapid Rehousing AUDIT form](#))

Landlord Outreach

The need to develop and keep landlord relationships is especially important. It is Five County's goal to ensure both rapid re-housing clients and landlords are treated fairly. Five County has structured its Community Action to where separate staff work with clients and landlords, to ensure each party has an advocate.

The landlord advocate staff member, in consultation with the program director, can also increase the amount of the deposit(s) or fees initially to offset risk to landlords as appropriate. Landlords will need to have written policy in place to justify increase deposits that can only address criteria such as criminal history, poor credit score, bad rental history, length of employment, etc. No increased deposits can be made for any criteria based on protected classes (Race, Color, Religion, Sex, Handicap, Familial Status, National Origin).

Housing / Utilities

Move-in Payments

Normally Rapid Rehousing covers move-in costs. This includes application fee(s) to several rentals, double rental security deposit, first and last month's rent, and utility deposit(s) for the first month. Prior to the client moving in, a home inspection form must be completed and the unit must pass the inspection.

(see forms for [RAPID REHOUSING \(RRH\) HOUSING HABITABILITY STANDARDS](#))

(see form [RENTAL TOOLKIT](#))

Back Utilities

If the rental requires the client to put utilities in their name, the client needs to make sure there are no back utilities owed. If so, the client and the case manager will work towards getting those debts satisfied first. If utilities owed aren't a barrier to housing, case manager doesn't need to press the issue with the client.

Rapid Rehousing grants cannot pay back utilities that are in collections. However, the case manager can work with collection agencies to try to mitigate fees. In some instances, CSBG funds may be used, if all other resources have been exhausted (CSBG is resource of last resort.) This should only be done when **rent and utilities in collections become a barrier to current housing.**

Back rent in collections

Rapid Rehousing grants cannot pay back rentals in collections. However, the case manager can work with collection agencies to try to mitigate fees. CSBG may, depending on approval, be used as a resource. This should only be done when **rent and utilities in collections become a barrier to current housing.**

Rental Subsidy

Five County AOG subsidizes rent with the Rapid Rehousing grants. Clients submit their income from the 15th of the month to the 15th of the next month. That income is input into the rent calculation sheet. The client must pay the highest of 30% of income or 10% of adjusted income for rent. Clients will be responsible for paying utilities if separate from the rent. Client utility payments may be credited for additional rent subsidy with a receipt. Utility payments that are not paid by the client, such as LIHEAP (HEAT), Emergency Solutions Grant (ESG), or CSBG will not be deducted from the client's rental portion. COC grants cannot pay any utility payments, but the utility payments can be deducted from the client rental portion later, with a receipt.

A rental calculation form must be completed, reviewed with the client (with any errors changed) signed by client, and maintained in client folder. The calculation sheet should also be submitted for check/ACH requests to landlords as accounting back-up. The calculations are conducted quarterly, but may be revisited at the request of the client for unexpected challenges (job loss, new medical expenses, etc.) The full rent payment is to be paid by the grant, then the client pays Community Action their rental portion. This also applies to monthly pet fees. Community Action will pay for the pet fee and the client will pay the full monthly pet fee, in addition to their rental portion, to Community Action.

(see forms **REVISED COC-INCOME-ELIGIBILITY-WORKSHEET-TENANT-INCOME-AND-RENT-CALCULATION**)

[see <https://www.hudexchange.info/resource/1835/hopwa-income-resident-rent-calculation/>, click on **Income Resident Rent Calculator** (XLSX)]

30-day vacancy Payments

COC and ESG grants allows for up to 30-days vacancy for situations like abandoning a unit, early move-outs, etc. The last month's rent can transfer over for the up to 30-day vacancy payment. However, rental assistance cannot be provided for more than 30 days from the end of the month in which the unit was vacated.

Client Rent Determination & rental portion Payments

Client portions of the rent will start the month after move-in (for clients who moved in between the 1st and 17th of the month). For clients who move into their unit after the 18th of the month, the client won't

pay their portion until the third month after move-in, giving them time to get the money to start paying their portion.

To decrease barriers for clients to pay their portion, there are several ways for the client to make their payment:

Online

Clients can submit payments online at <https://fivecountycap.org/donate/> then click "Rapid Re-Housing Client Rent Portion". This is the Community Action PayPal account. The client does not need a PayPal account to use this method for payment, however there is generally a \$3.00 transaction fee that's added onto each payment transaction. If the \$3.00 fee isn't added to their rental portion amount, the payment is not paid in full until the \$3.00 is paid.

Walk-in payments

Walk-in payments are accepted where cash or cashier's check/money order will be accepted. When cash is given as payment, exact change is expected. The St. George Community Action office can also take debit or credit card transactions. The client is to be given a receipt.

A receipt of income memo is to be created, which is stapled to the cash/cashier's check/money order and given to accounts payable/receivable to be deposited into the project income account.

To provide flexibility to the client, clients can also drop off their check, money order, or cashier's check in the night drop box at the Five County St. George location. Once client notifies case manager of night drop payment, client is to be emailed and mailed their receipt when this occurs.

Phone payments

The client can call (435) 674-5757, the Five County AOG Community Action number in St. George to make a payment over the phone. The client is to be emailed and mailed their receipt when this occurs.

Once the client pays their portion, it is to be documented onto the spreadsheet used by staff to keep track of payments and Rapid Rehousing spots.

If office staff receive money in a satellite office, they must abide by the cash handling procedure for local deposits.

Clients are encouraged to pay their rent on time to help with housing instability. If a client is unable to pay their rental portion, their income can be collected and the rent payment amount can be recalculated for the following month, with the expectation that they still pay their portion for the current month. Clients that make at least \$50.00 toward their rent on time but can't pay the full balance for that month can be provided some flexibility. The current rent can be broken in half and added to the next two months of rent payments if the client pays their rent by the 5th of the month. If the client doesn't pay the full rent (rental portion + half of the previous month), they will be terminated on the 8th of the month (next day).

(see forms [FY -COC & ESG RRH SPOTS](#))

Funding Memos

To ensure consistency in documentation for payments, funding memos will follow a consistent procedure. Funding memos will be submitted into DocuSign. The funding worker will be the first signor and the Community Action Director will be the second signor. Once both signatures are on the funding memo. The memo is to be printed and taken the accounts payable. Then, the payment is to be submitted into both HMIS and CAP60 (within 5 business days). The signed funding memo is to be saved in the client digital file.

Utility Subsidy

Unless the funding source and grant scope of work covers utilities, clients should pay their own utilities. However, in accordance to HUD guidelines, utilities paid for by the client may be deducted from client portion of rent (including utility deposits).

Case managers should also note when utilities should be covered by other funding when it becomes a barrier to remaining stably housed.

The program director may also authorize additional utility assistance as an incentive for participating in financial literacy, employment, and other programs.

LIHEAP Utilization

Case managers are required to inform clients about utility assistance offered by the Utah HEAT program (administered by Five County AOG in the region). **Clients are not required to utilize this service but should be referred to the program.**

Supportive Services provided to clients

The following services can be provided to Rapid Rehousing clients

Case Management

FCAOG Community Action Case Managers provide case management to all ESG clients. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under [§ 578.23\(c\)\(9\)](#);
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Either FCAOG Community Action Case Managers or assigned DOVE Center Case Managers will provide case management to all COC clients. The DOVE Center is reimbursed for the case management time provided to the COC clients. It also includes housing searches and filling out applications with clients for units and helping clients apply for their annual recertification.

For DOVE Center Case Management reimbursements, the backup documentation for the reimbursement must include the DOVE Center staff name, DOVE Center position, pay rate, and amount of hours they worked with the COC client.

Food

The cost of providing meals or groceries to program participants is eligible.

Utility Deposits

This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies. These are typically paid for by CSBG match funding.

Eviction Policy

Five County AOG has the goal of stabilizing clients in their housing. Case managers should review the tenant education resource packet with the client at move-in. Case Managers are also able to inspect the apartment monthly, when applicable. Landlord outreach should occur monthly- when possible, identifying and mediating poor tenant-landlord relations proactively where possible. However, this will not always be successful, and some clients may face eviction.

The client may not be terminated from the program if an eviction is made by the landlord.

In instances where clients become evicted because of alleged/documented poor tenant behavior, Rapid Rehousing may be able to rehouse the client, even when eviction occurs, when appropriate. If clients are placed into new housing again, the case manager will review the lease with client and incorporate appropriate interventions into the case plan to help the client better prioritize their housing.

Multiple security deposits for the same client are allowable when a household must be relocated to a different unit (e.g., if FMR and/or rent reasonableness changes or if household composition changes). Any refund of the initial deposit must be returned to the agency, shown on the invoice disbursements journal as 'Program Income - Deposit Refund,' and reported on the CoC Annual Performance Report as Program Income.

In the event a rapid re-housing client goes through the eviction process, the case manager will staff the case with the supervisor as to whether assistance will continue (please refer to policy on exiting program). Case managers should establish safety plans, work with the clients to identify new re-housing opportunities- if eligible and conduct a new SPDAT assessment as needed. If the client's case is closed and they fulfill the category 1, 3, or 4 of the HUD homeless definition, the case manager should offer to put the client back onto the HMIS housing list and perform a new SPDAT.

As a policy, relocation deposits, first/last month rent, and other related services will be offered as permitted by funding source. In some instances, a funding source may restrict additional deposit after one relocation or may not allow for damages to be paid from a specific grant. COC can only re-house a client one time in the 2-year period. It is important during staffing that Five County AOG staff, sub grantees, and partners identify solutions to overcome barriers to rehousing, which may be using other available funding sources to rehouse a previous client.

Tenant Counseling, Housing Stabilization Plans, and Monthly Unit Inspections:

Housing Stabilization Plans should be made to help clients make and keep their goals, which should move them toward stabilization. Breaking the Housing Stabilization Plan will not result in termination of the client. The case manager should use the Housing Stabilization Plan to identify problems in advance. The primary purpose of housing plans is to keep clients housed and progressing (see 24 CFR 576-401€(1)(ii)).

All clients are allowed flexibility in designing their housing stability plans, which means they have the discretion to establish their own goals. They also are allowed discretion regarding

being required to participate in certain services to move toward their goals after being housed. Their goals should always have a Housing First and housing stability approach. Clients are required to participate in supportive services as a condition of continued program participation including participation in substance abuse treatment services and mental health services). If the client is terminated due to not participating in substance abuse treatment, they have the right to go through the appeals process. See [CoC and ESG Additional Requirements - Required Participation - HUD Exchange](#) for more information. See appeals process. Case Managers should meet with clients monthly to review the housing stabilization plans with the client (see 24 CFR 576-401€(1)(i)) and provide referrals to any needed physical health, mental health, or other social programs they may need assistance from.

After move-in, the case manager may complete home visits with the client. The first home visit agenda is to review the tenant education resource packet, the lease, review/create a new Housing Stabilization Plan, review their rental portion for that month. This should give the client enough warning and time to start saving for their portion. A home inspection should be completed monthly, with some flexibility. The case manager will mostly be looking for these things:

1. Safety hazards: blocking fire exits, unplugging fire alarm, stacked bins/boxes (could fall on children, nails on floor, etc.), medications/poisons/cleaning supplies/flammable liquids not properly stored, and/or cleared walkways.
2. Property kept within living standards: food on the floors or writing on surfaces (clutter is not a major issue unless it becomes a safety issue), no holes in walls, doors, broken cabinets, broken windows, mirrors, and glass, etc. No presence of mold, pests, and sickness.
3. No repairs to the home needed: dripping faucets / leaking dishwashers / toilet running / dripping ceiling / etc. Client may have responsibility for repairs, if caused by them. Landlord maintenance issues should be reported. Energy leaks (heat and cooling loss from unsealed windows and doors). Referrals to weatherization.
4. Homes built in 1978 or earlier must be closely inspected to make sure they are safe for families and children.
 - a. All landlords will complete a *Disclosure of Information on Lead-based Paint and/or Hazards*.
 - b. All RRh clients will receive an information booklet about *How to Protect your Family from Lead in your Home*. This typically comes from your landlord or in your lease.

All subsequent home visits will include reviewing the Housing Stabilization Plan, any issues with the rental, and any complaints from the landlord (when applicable). A SPDAT will also be completed quarterly, then input into HMIS within 5 days of assessment.

Deposit Returns:

Landlords are asked to return unused deposits back to FCAOG to try to provide services to additional clients. In many instances, landlords, may need to keep the full deposit to repair damages or recover costs. This is acceptable with an invoice that covers the full deposit amount. **However, it is against Five County Community Action's policy for the client to receive the deposit back.**

Master Leases:

Rapid Re-Housing policy prohibits funding rapid re-housing clients with master lease housing. This is a violation of regulations and best practices.

In some instances, Five County may be able to make payments to community agencies if they own apartment units directly (such as Dixie Sun Manor. If agencies own units which are already subsidized by another program, Five County will not be able to house clients in these units. However, the case manager may be able to fund the deposit from another funding source. The client shall be offered this option.

(Please see Deposit Assistance Policies and Procedures)

Essential Requirements for maintaining Program Participation

HUD rules allow for termination of assistance when a program participant violates program requirements.

When initiating termination proceedings, the recipient or subrecipient must:

HUD intends COC Program recipients and subrecipients to terminate assistance only in the most severe cases. When terminating hard-to-house homeless individuals, recipients and subrecipients must exercise judgment and examine all extenuating circumstances when determining if violations warrant termination.

- Provide the program participant with a written notice including the reason(s) for the termination. Clients must have ample time to address concerns before termination is initiated, which is at a minimum 10 business days (when the Community Action Department is open for business). The deadline can be extended for amount of days that the client was institutionalized during the “warning letter” period (with documentation of number of days). However, termination occurs with any institutional stay after 90 days.
- Allow for a review of the termination decision, which includes allowing the program participant to provide written objections. Note: The review cannot be conducted by the person who made the original termination decision or a subordinate of that person.
- Provide prompt written notice to the program participant after the final determination has been made via certified mail and another communication method.
- Termination under this section does not bar Five County AOG from providing further assistance later to the same individual or family.

Late Fees

Five County will not pay late fees due to a client’s negligence (not returning documentation before the case manager’s deadline or not recertifying before their rent is due). In cases of negligence, clients must pay their own late fees. Federal grants cannot be used to pay for late fees.

If the client does not pay their rental portion by 5:00 p.m. on the 5th of every month, a \$10.00 late fee will be assessed. In the event that the 5th of the month falls on a Saturday or Sunday, payment is expected the following Monday.

Case Manager Safety & Mandatory Reporting

It is important that the Rapid Rehousing Case Managers be vigilante about their own safety.

Home Visits

Home visits may tell the case manager many things about the household (understanding household dynamics, where the household needs support, how the household is taking care of the unit, eliminating the barrier of transportation for the household, etc.). However, the case manager must be vigilante with their own safety while doing home visits to make sure they’re in a safe environment.

Maintaining staff safety is of critical importance to Five County Association of Governments and DOVE Center. Case Managers must be well informed about and utilize strategies designed to promote staff safety. This may include but is not limited to being accompanied on a visit and if necessary, relocating visits to an office setting or public space.

Training on safety

Strategies and issues regarding staff safety are regularly discussed in staff meetings. At least annually, a staff meeting will be dedicated to training on safety focused topics selected with input from staff

Sharing of schedules and communication while in the field

Case managers are expected to maintain an up-to-date calendar that must be shared with their supervisor and/or other staff members. If contacted by the supervisor or another staff member, the case manager is expected to respond as soon as possible, but no later than the end of the day. In case of an emergency, the case manager contacts the proper authorities and then calls the supervisor directly after. An incident report must be filled out, signed, and turned into the supervisor within 24 hours of the event.

Planning for the visit and outdoor safety

Case Managers should get clear directions for where they are going and map out the safest, most direct route ahead of time. The Rapid Rehousing Case Managers may take the household file with them to the visit as long as it is stored behind a lock before and after the visit (i.e. in a locked suitcase or in the trunk of the car). No other household files may go into the household's home except their own file. If the Rapid Rehousing Case Managers has safety concerns, they need to talk with their supervisor about it. It may be helpful to go in pairs for the first home visit, or when the case manager feels that safety is an issue. Cell phones are useful to have on home visits, make sure it's charged to last through the home visit.

The case manager may want to:

- Decide before the visit, with the client, who you will say you are (i.e. babysitter, daycare provider, Root for Kids, old family/friend, Avon representative) if the case manager and client are seen together and asked who the case manager is
- Decide before the visit, with the client, a code word to alert the case manager if the visit needs to end immediately and the case manager needs to leave.
- Put all valuables out of site (in the trunk of the car) or don't bring them at all
- Keep the car doors locked
- Make sure the car has enough gas prior to arriving at the home visit
- Park in a well-lit and visible area, as well as backing the car into a spot
- Always trust your instinct about feeling uneasy/unsafe
- When leaving the home visit, have the car keys in hand
- Introduce yourself to the households' significant other
- If you are being followed, don't drive home. Instead, drive to a police station, hospital, gas station, or fire station where you can seek help.

Communicable diseases/sanitation precautions

Case managers are encouraged to wash their hands or use hand sanitizer before and after each visit to help prevent bringing germs into clients and their own homes. If the case manager observes evidence of a pest control problem in the home, the case manager should limit the time in the unit.

Safety during home visits:

Case managers should not wear or bring valuables on a visit, should wear comfortable clothing and shoes that allow them to move easily, and carry identification on their person. Visits should take place in

common areas of the home, such as the living room or kitchen. The case manager should sit facing a door when possible. If a case manager feels unsafe around a family pet, he/she will ask if the pet can stay in another room. If the client is unwilling to do so and the case manager feels endangered by the animal, the case manager will leave the visit.

The case manager may want to: 1-Establish the goal of the visit, being clear about the schedule/time (and possibly that you're expected elsewhere at a certain time), 2-Keep your eye out for suspicious items in the house (i.e. drug paraphernalia, guns, alcohol containers, abnormal odors, threatening animals, etc.), 3-Always position yourself toward the door so you're not trapped inside, 4-Respect the household's space and ways of doing things, 5-Avoid giving out too much information (social media sites give out a lot of information about you), 6-If you are working with someone stronger than you (or the opposite gender/sex), consider meeting outside of the home in a neutral public location or pre-arrange for another staff to accompany you.

If any person in the home is agitated or aggressive, the case manager may attempt to de-escalate the situation if the case manager feels comfortable doing so and is not in immediate danger. If the case manager is not able to de-escalate or does not feel safe in attempting to do so, the case manager leaves immediately as calmly as possible, and contacts the police (when appropriate).

If a case manager observes what appears to be illegal activity in the home such as the sale or manufacturing of drugs or a significant safety concern such as a gun or any weapon or any nudity, the case manager can leave the home as quickly and calmly as possible. The case manager then immediately contacts the supervisor and determines the authorities that need to be contacted (such as the police and/or child abuse/neglect hotline). As a reminder, report any incidents to your supervisor. Case Managers should ensure that they fulfill their mandated reporter responsibilities whenever it applies to an abuse/neglect child/vulnerable adult situation(s).

Case Manager is to file a claim when:

Has the child's parent/caregiver said they may cause serious harm to the child?

Does the child have visible injuries from abuse or neglect?

Did the child tell you they are being abused or neglected, and they are afraid to go home?

Has the child been admitted to a hospital due to abuse or neglect?

Is there is a report of sexual abuse or serious physical abuse and the alleged perpetrator has access to the child?

Is there an active meth lab in the home?

Is there a suspicious or unexplained death of a child in the home?

Does the child need emergency treatment (medical or psychological) and the parents/caregiver are unavailable or refusing to get treatment?

Is there no caregiver available for the child and they are unable to care for themselves, or they are in immediate danger due to no protection?

If a child reports something to you, then **YOU must make the report to the Division of Child and Family Services (DCFS) at 1-855-323-3237**. You cannot report to a supervisor and allow the supervisor to

determine whether a report should be made. If you receive a disclosure of abuse or have reason to believe abuse is occurring, make the call yourself. Clinical professionals at DCFS are trained to receive and evaluate reports of child abuse and work through legal channels to determine how to investigate reports. Once a report is made, DCFS becomes legally responsible for handling the case in an ethical way.

Mandated reporter information

Five County Association of Governments Rapid Rehousing Case Managers are mandated reporters. If staff witnesses, hears about or suspects child abuse (including domestic violence in the presence of a child), substance use or neglect, it must be reported as soon as possible but no later than 24 hours after the incident. Once a report is made, an incident report must be completed and signed by the case manager and turned into the supervisor. The incident report must be completed within 48 hours and any case numbers given must be listed on the report.

- **Abuse/Neglect of Seniors/ Adults with Disabilities: 1-800-371-7897**
- **DCFS Report Line: (855)-323-3237**
- **Utah Domestic Violence: 1-800-897-LINK(5465)**

Waived home visits

Home visits may be waived by the domestic violence case manager (DOVE Center) while the case remains open and case management continues outside of the client's home. Situations which require this are as follows:

1. Abuser is living in the home OR at the home while the home visit is being done
2. Abuser knows housing location and is not staying away
3. Abuser's behavior includes stalking/following survivor
4. Any violent crime occurs at the client's residence

Should any of these situations occur, the supervisor is to be informed that the home visits are being waived and whether the case manager can continue providing supportive services to the client. In this situation, the client is to be offered two options to continue the home inspections:

- 1- Completed virtually via technology (with DOVE Center Case Manager)
- 2- Five County staff member come and do monthly physical home inspections.

When the client chooses the physical home inspection by Five County staff, the Five County Association of Governments-Community Action Case Manager can complete the home inspections but not the case management (and are invited to bring a second staff to accompany them).

If two FCAOG staff members attend the home inspection, best practice is for one staff member to stand in the open doorway while the other staff member inspects the home.

When the DV provider is no longer able to do home visits, they are to create a safety plan that includes safety for both the client and the FCAOG staff member(s) completing future home inspections. This is given to the FCAOG staff member before home inspections occur by FCAOG staff member(s). Best practice is to create 2 separate safe words/phrases, which should be created by the client.

Safe word/phrase #1: leave with no questions asked

Safe word/phrase #2: leave with no questions asked AND call the police

If client chooses not to create a safety plan for continued home inspections, home inspections will stop immediately. Client can choose to create safe words/phrases later to start up home inspections again with the FCAOG staff member(s).

Typically, DV provider will continue to provide case management during the case even when they're no longer performing home inspections (and Five County staff is completing home inspections, or no home

inspections are occurring). DV provider will frequently check in with client's current situation (in case DV provider can start completing home inspections again).

The Five County Association of Governments – Community Action Case Manager can voice any safety concerns with the supervisor and home visits may be waived altogether during the case if:

- Case Manager witnesses any abusive or violent, aggressive behavior toward anyone in the home.
- Increased safety concerns for any household member(s) or case manager.
- Case Manager sees any weapon in the home while conducting a home inspection.
- If the client chooses not to create/use their safety plan (created by the client and the DOVE Rapid Rehousing Case Manager) home inspections stop immediately.
- If home inspections are waived by DV provider and FCAOG, the case stays open and case management continues, with frequent check ins by the case manager on starting up home inspections again.

Meeting at the office

When home visits are waived, the client is still required to continue case management to keep the Rapid Rehousing case open. Thoroughly discuss where it's best to have visits that are safe and comfortable to both the client and the case manager (with case manager's office being an option for case management visits).

The case manager may want to:

1. Have an emergency escape route determined
2. Arrange furniture to give you access to the exit (when possible)
3. Interview in pairs if you're working with a possibly threatening person and/or when you feel your safety is or may be threatened
4. Use the office procedure for help when faced with a threatening participant
5. Keep your desk clear of objects that could be used as a weapon

Subgrantee Guidelines

Monitoring

Subgrantees are required to abide by all HUD and Utah Balance of State requirements. An annual monitoring visit will be conducted by Five County AOG administrative staff to ensure compliance with HUD and Utah Balance of State requirements.

Five County AOG reserves the right to ask for pre-award risk-assessments prior to entering any contract agreement with subgrantees.

Subgrantee Responsibilities

MOU's should outline the specific obligations of subgrantees. Grantees must abide this agreement to be reimbursed.

Monthly Reimbursements

Subgrantees are required to submit reimbursements monthly, to ensure project drawdown by administrative staff.

Annual Recertifications:

If clients receive assistance for more than a year, they must provide 30-days of income to verify they meet the 30% AMI mark to continue with the program. Income is collected from the middle of the month to the middle of the month (15th to the 15th), to fall in line with the client's quarterly income

submissions. Staff should utilize the HUD Income Verification Calculator tool on HUD exchange and place in client file.

Along with signing the HUD Income Verification Calculator sheet, the client must resign the Five County Release of Information and the "family printable documents" sheet on CAP60. If client refuses to sign the HUD Income Verification Calculator sheet, case manager can notate on the form why they refused to sign the HUD form.

Tracking Recertification dates in accordance with HUD requirements, on an annual basis, client's income and household composition of all participants will be reexamined [24 CFR 582.310(b)(2)] and input into the HUD exchange website to be signed by the client. This HUD exchange sheet also indicates if future funding, past the 12th month, can occur. The Five County Association of Governments – Community Action Case Manager will keep track of the renewal dates for each participant. 60 days prior to the re-certification due date, the Five County Association of Governments will contact the client's case manager (only if being case managed by another person) to inform them of the upcoming renewal and housing inspection. The income will not be due/collected until the 30-day letter is sent out. In the event that the client does not complete the re-certification after the 10-business day deadline of the 30-day notification letter, the landlord may be notified that rent may be placed on hold until completion of the re-certification and/or the rent will be terminated if the client fails to submit needed documentation. The 60-day notification deadline will extend to the end of the month that the recertification date is, but not require income, yet. It will also notify the client of the date the grant will no longer fund them if they fail to submit needed documentation or exceed income limits. The 60-day notification letter will be issued using two ways of communication to the client (i.e. certified mail and client's email). The client's case manager will also be emailed the letters. Best practice is for the certified letter to go to the last known address of the client via certified mail (certified mail marked "restricted delivery") or having the client sign the notice and email notice and email or bring in the signed notice to the case manager.

Documents Required from the Client

The client will receive notice of the required annual re-certification with the forms to be completed. The partner agency case manager (when applicable) will work with the client to complete this packet and return it to the Five County Association of Governments – Community Action within the 60-day specified time frame.

The client's submitted income or self-declaration of no income will be input into HUD INCOME ELIGIBILITY CALCULATOR on the HUD Exchange dashboard website. That must be printed and presented to the client for review and signing (on page #3). Five County Association of Governments Case Manager will also sign the 3rd page.

If there's no response within that stated period, a termination letter will be sent to the client with an appeal form, which give the client 10 business days to appeal the decision with Five County Association of Governments. In accordance with 24 CFR 582.310(b)(3), as a condition of participation in the program, each client must agree to supply the information or documentation necessary to verify the client's income.

(see forms [FCAOG COMMUNITY ACTION RELEASE OF INFORMATION](#)- must be annually re-signed by the client)

(see forms [CAP60 ELIGIBILITY SHEET](#) in CAP60–must be signed by the client)

(see forms [HMIS INFORMED CONSENT RELEASE](#))

(see forms [HOME INSPECTION](#) – COC PERMANENT HOUSING STANDARDS CHECKLIST – completed)

(see forms [WARNING LETTER TEMPLATE](#))

(see forms [TERMINATION LETTER TEMPLATE](#))

Exiting Clients from Program

Any time, for any reason, a client is no longer receiving housing assistance, they will be given a termination of funding letter.

The case manager must communicate with clients via two different mediums and provide 10 business days for clients to come into compliance (warning letter). The warning letter must fall on Monday through Thursday only at 5:00 p.m. only because the CAP office isn't open on Fridays for walk-ins. One medium must be certified mail sent USPS with the receiver being the client by check marking the "certified mail restricted delivery" on the certified mail slip (green) when the case manager has an address for that client.

Discontinuation Based on Poor Tenant Behavior

Five County Association of Governments expects tenants to abide by the terms of their lease. As such, case managers should review the tenant education resource packet and terms of the lease agreement with their client to help support good tenant behavior and set the client up for future success. Five County Community Action staff should problem solve/staff cases in instances where alleged client behavior risks eviction.

If a case manager determines that a client is breaking a lease, it is the duty of the case manager to encourage the client come into compliance with the lease, if possible. RRh staff may inform the landlords or the landlord advocate FCAOG of the concern.

Client does not meet the Minimum Requirements

Although Five County will not use eviction or failure to meet a case plan as a basis of termination, all clients are expected to meet the following requirements:

[Submit income verification documents and pay their portion of the rent \(including pet fees\)](#)

Clients are expected to pay their portion of rent. Income is collected from the 15th of the month to the 15th of the following month (including annual recertifications). This allows a two weeks' notice of what the client rental portion will be. To determine the correct subsidy amount, clients should submit income verification by the 20th of the month to calculate their portion but no later than the 5th of the following month (as that's when the client's rent is due). Calculations are made quarterly using the last 30 days income (the 15th of the month to the 15th of the subsequent month) unless a client requests a new calculation because their income decreased. Failure to submit documents for determining the rental amount or failure to pay after may result in termination. All pet (except for service animals) fees are to be paid by the client in addition to the rental portion amount, unless protected explicitly by the Fair Housing Act or state law.

[Actively engaged in obtaining housing](#)

If no application fees are paid, no housing searches are done by the client, client fails to follow through with potential housing/landlords, etc. client will be exited from the program after 90 days of enrollment date.

[Annual recertification under the 30% AMI guidelines after a year of being in the housing program](#)

If clients are no longer eligible, they will be discontinued from the plan.

Case Management for 180-days post exit

No matter the reason the case is closed, case management can still be billed for 180 days after the date of exit. Case Manager is to track the absolute last date of case management on the Rapid Rehousing sheet to help track this date. Case Manager is to also input the date into CAP60 under “edit case” and change their case status to “completed”. Note in the comment section at the bottom of the case information page the last date of rental assistance funding with the last date of case management (exactly 180 days after the rental assistance ends).

(see form [termination letter](#))

Continuum of Care (COC) Joint Transitional Housing - Rapid Re-housing grant with DOVE Center

Introduction

Five County operates a Joint Transitional Housing - Rapid Re-housing (TH-RRH) program in partnership with DOVE Center with the COC DV Bonus funding. With the DV bonus in mind, DOVE Center operates an emergency shelter and a shelter extension site (called Erin’s House). Although they are two separate programs, they work together to provide a low barrier and a temporary safe place for those experiencing literal homelessness. All Joint TH-RRH clients should have the option of staying at Erin’s House, to fulfill the transitional housing piece of this grant. These two programs combined provide crisis, safe housing while linking them with financial assistance and services to move people into permanent housing.

In a community where the length of stay in shelters is rising and many homeless people are being turned away, it is Five County’s hope to work with shelters to house clients. Currently, the community has experienced a long duration of a housing crisis and it takes longer for people to secure housing. The desired impact is to help homeless clients work towards self-sufficiency, remove barriers toward, and achieving permanent housing.

All Continuum of Care funds should comply with 24 CFR 578, Utah Balance of State Policies and procedures manuals, Local Tripartite Board requirements (Five County Human Services Council), and the Community Services Block Grant (CSBG) organization standards.

All TH-RRH funding should be coordinated to support households that are transitioning from an emergency shelter while providing community linkages and other wrap-around services that increase the individuals self-sufficiency. It is expected that Case Managers will coordinate services appropriately. The design of this grant is for a person to be selected for this grant (while at emergency shelter or fleeing DV), offered transitional housing while working toward obtaining permanent housing in the community, and have an opportunity to receive personalized case management services. The max amount of funding is not to exceed 12 months (from enrollment to exit).

Transitional Housing Placement and Payments

In accordance with 24 CFR § 578.37(2), COC can make payments toward transitional housing for clients enrolled in this grant. Payments to an Erin’s House unit can start once client is enrolled for a TH-RRH spot and the client is housed in a Erin’s House unit for up to 12 months. If the client doesn’t reside at Erin’s House, no other transitional housing payments will be made. However, the client can still access the Rapid Rehousing funding to move into a scattered site unit in their community.

The grant will fund the first month’s rent (or pro-rated rent) (see “bed specific spots” below”) and the deposit (equal to the rent) at move-in. Rent will be paid monthly (by the first of each month) when the

client plans to stay an additional month. If the client is planning on leaving before the entire month is up, a pro-rated amount will be funded.

Bed specific spots

The spots filled with COC will be bed-specific (i.e. 1-bed unit, 2-bed unit, or studio units). These payments are calculated by using HUD's Fair Market Rent Amounts

Erin House Transitional Housing Spot	Rapid Rehousing Community Spot
One studio unit (for up to 2 people) Payment of \$924.00/month	1-bed unit Rental amount around \$800.00/month
One studio unit (for up to 3 people) Payment of \$924.00/month	1-bed unit Rental amount around \$800.00/month
One 2-bed units (for up to 4 people) 4 th person (infant or toddler size) Payment of \$1,226.00/month	3-bed unit Rental amount around \$1,400.00/month
Total funding: 3 units and at least 5 beds	Total funding: 7 units and at least 16 beds

Deposits to the Erin House units will be paid by CSBG. For two single COC clients, they can be doubled up in a single room (bunk bed room) at Erin's House as long as both clients agree to try it. In that case, full deposits will still be paid for each client for the same unit.

The spots can be fluid, based off the client(s) need and availability at Erin's House. Example: a client was chosen (and accepted) the 2-bed unit at Erin's House with the 3-bed community RRh spot. There's a 1-bed Erin unit available that the family can fit in. They can accept the 1-bed transitional Erin's house unit and still get the 3-bed community RRH spot.

Erin House Payments

Tenants residing at Erin's House may be required to contribute to their rent. The client must pay the highest of 30% of income or 10% of adjusted income for rent. Client rental contributions should not exceed the transitional housing rent amount. For situations where two single COC clients bunk together at Erin's House, half the rent amount will be paid for each client. So, DOVE will still receive the full payment of the unit, but it will be divided into two separate funding memos with different names.

When rent payments are paid for Erin's House stays, FCAOG will email the DOVE Center Accountant and Program Manager every time a payment is made.

Rent payments are to include rent for when the tenant lives in the unit, monthly security and landscaping charges, and any other monthly recurring charges. Client rent calculations will be for the actual days the client plans to live at Erin's House (i.e. a client is leaving early, they will not be billed for the entire month, rather the days they plan to stay).

30-day vacancy Payments

This grant allows for up to 30-days vacancy for situations like abandoning a unit, early move-outs, etc. The last month's rent can transfer over for the up to 30-day vacancy payment. However, rental

assistance can not be provided for more than 30 days from the end of the month in which the unit was vacated.

Deposit Returns:

DOVE Center is asked to return unused Erin's House unit deposits back to FCAOG in order to try to provide services to additional clients. In many instances, DOVE Center may need to keep the full deposit to repair damages or recover costs. This is acceptable with an invoice or specific expense report (of each unit to cover the 25% of the refundable deposit) being submitted to explain the charges and reason for the deposit not being returned. **However, it is against Five County Community Action's policy for the client to receive the deposit back.**

Allowable charges for cleaning and security deposits

75% of the security deposits is non-refundable at Erin's House in order to cover expenses that are required to maintain the unit. The other 25% of the deposit will cover things such as security hardware replacement, household item replacements, repairs/renovation in the unit after tenant exits, unpaid rents after move-out, cleaning the units after move-out, rekeying the units or issuing extra keys to tenant, fire extinguisher replacements, etc.

Case Plan

Case Management for all TH-RRH clients will be provided by DOVE Center Case Managers. However, Five County Association of Governments – Community Action Case Managers are willing and able to step in and help, wherever necessary.

Housing Stabilization Plan

For the TH-RRH program, emphasis is placed on housing stabilization plans rather than case plans. This connotes the notion of a housing first, client-choice, motivational interviewing, trauma informed approach. These plans cannot remove a client from transitional housing or Rapid Rehousing due to non-compliance of case plan. It also reinforces housing stabilization as the first step towards self-sufficiency.

Housing Stabilization Plans should include to move into permanent housing and to start housing searches upon TH-RRH enrollment.

To reside at Erin's House, and participate in the transitional housing component, client will be required to sign "Erin's House Licensing Agreement" which outlines expectations while residing at Erin's House. If violated, the client may be asked to leave the Erin's House unit, and DOVE continues to offer case management. The client may not be terminated from the program if asked to transition from Erin's House.

In instances where clients transition as a result of alleged/documented poor tenant behavior, client is to be exited from the Transitional Housing component (on HMIS), but continue to stay enrolled in the Rapid Rehousing component, when appropriate. The client will need to work with DOVE Center staff to determine eligibility to return to the Erin House unit, when there's been a violation.

Essential Requirements for maintaining Program Participation in Transitional Housing

HUD rules allow for termination of assistance when a program participant violates program requirements. Two instances where termination based on poor behavior occurs are for the following:

1. Not submitting program documents needed for eligibility

2. Not completing monthly unit inspections
3. Tells others where the location of the Erin's House is
 - i. When this occurs, the client can no longer stay at Erin's House. The Transitional Housing enrollment is closed. However, the Rapid Rehousing enrollment may stay open if the client wants that.

Homelessness Prevention (State Homelessness Funding)

Introduction

Homelessness Prevention activities are designed to prevent an individual from moving into an emergency shelter or living in a public or private place not meant for human habitation and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

Five County's program is for singles only as Five County also manages a TANF grant. This single Homelessness Prevention grant is to fill the gaps of those with no children in the home. Homelessness Prevention assistance consist of short-term (up to 3 months) and/or medium-term (4-24 months) tenant-based rental assistance, rental arrears (one-time payment of up to 6 months, including any late fees for the tenant's portion of the arrears), rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, housing search and placement, housing stability case management, mediation, and credit repair. Upon request, any client can receive the most recent approved FCAOG CAP Policies and their client file.

For the specific requirements and eligible costs of the Homelessness Prevention component, see § 576.103-106 in the **ESG Program Interim Rule** and the **ESG Eligible Activities Virtual Binder** or <https://www.hud.gov/sites/dfiles/CPD/documents/SNAPs-Shots-ESG-Eligible-Activities-Homelessness-Rapid-Re-Housing.pdf>

Five County AOG has established and maintains standard operating procedures for ensuring that HP funds are used in accordance with the requirements of the grant, including:

Moves for victims of domestic violence, dating violence, sexual assault, and stalking

For each program participant who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under § 578.51(c)(3), Five County AOG will retain:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement

records; or written certification by the program participant to whom the violence occurred or by the head of household.

- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

[see Emergency Transfer Plan]

Length of Assistance

According to HUD guidelines, homelessness prevention funding sources provide short and medium-term rental subsidy. Each case should be determined separately, but the length of assistance will be at least 3 months and may not exceed 6 months in this program. However, there may be clients able to achieve self-sufficiency prior to 6 months of funding. Enrollment into the housing grant begins once intake is complete.

Homeless Prevention requires recertifications every 3 months of assistance. If client doesn't complete or satisfy the recertification requirements, client(s) will not receive any additional funding.

Housing Standards

FAOG cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). Prior to funding, the case manager must complete a housing habitability form.

1. **Services Provided-** Five County AOG documents the types of supportive services provided under the RRH program and the amounts spent on those services. Five County AOG keeps record that these records were reviewed at least annually and that the service package offered to program participants was adjusted as necessary.
2. **Conflicts of interest-** Five County AOG keeps records to show compliance with the organizational conflict-of-interest requirements in § 578.95(c), the Continuum of Care board conflict-of-interest requirements in § 578.95(b), the other conflict requirements in § 578.95(d), a copy of the personal conflict-of-interest policy developed and implemented to comply with the requirements in § 578.95, and records supporting exceptions to the personal conflict-of-interest prohibitions. **[see staff certification form]**
Conflict of Interest with tenant and landlord could also arise. Landlord signs a statement of conflict of interest when providing unit information for possible funding. **[see Deposit or Housing assistance Landlord Agreement]**
3. **Affirmatively Furthering Fair Housing-** Five County AOG maintains copies of their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in § 578.93(c)

4. Low-Barrier Housing

Five County AOG homelessness prevention policies should reflect the policies set forth by funders (including US Department of Housing and Urban Development), the Utah Homeless Coordinating Committee, the Utah Balance of State, and local LHC addendum.

These are the current low-barrier principles which will be followed when serving homeless clients enrolled in state and HUD-funding rapid re-housing programs:

- a. Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or other unnecessary conditions.
- b. Programs or projects do everything possible not to reject an individual based on poor credit or financial history, poor or lack of rental history, criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- c. People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy and building and apartment units include special physical features that accommodate disabilities.
- d. Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- e. Housing and service goals and plans are highly tenant driven.
- f. Supportive services emphasize engagement and problem-solving over therapeutic goals.
- g. Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- h. Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- i. Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- j. Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements. When payment plans are agreed to, rent must be paid on time (by the 5th of every month).
- k. Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy or safety is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

Fees for Services

No enrolled client will pay a fee for service for any Five County service. The only allowable exception to this rule is for homelessness prevention clients to share their portion of rent to Five County.

Coordinating with Emergency Shelters and Other Human Service Providers

All homelessness prevention funding should be coordinated to support transitioning households from emergency shelters and providing linkages to other services which will increase self-reliance. Some can be provided within Five County Association of Governments (such as HEAT, Weatherization, and Aging

Services) while many services must be coordinated with outside agencies. It is expected that Five County staff will coordinate services appropriately.

“Side-dooring”

Side-dooring is the practice of trying to bypass coordinated entry procedures and LHCC/COC-specific policies in place to ensure coordination of services. If any Five County staff deliberately engages in the practice, they will be subject to disciplinary action.

HEARTH-ACT Coordination

All staff working homelessness prevention grants are required to comply with HEARTH Act requirements. As part of intake, those Heart Act questions and coordination must always occur for parents with school age children in the case. Although this grant serves adults without children, it could serve unaccompanied youth or adults with children who may be joining the home.

Not Eligible for other Rental Assistance Programs

Five County cannot use state homeless funding to pay for section 8 rent or to duplicate any other subsidized rental assistance program (this does not apply to Section 42 Housing which is a developer tax credit rather than direct client rental assistance). Five County will also not use homeless funding to pay utilities paid for by HEAT. In short, there will not be double-charged assistance in the rapid re-housing programs.

Units approved for Homeless Prevention Funding

Environmental Review Policy

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it complies with the National Environmental Policy Act (NEPA) and related laws and authorities. All HUD-assisted projects are required to undergo an environmental review to evaluate environmental impacts. The analysis includes both how the project can affect the environment and how the environment can affect the project, site, and end users.

An environmental review must be performed before any funds, regardless of source, are committed to a project.

Documentation of the environmental review should be maintained in the environmental review record. This record contains the description of all activities that are part of the project and an evaluation of the effects of the project on the human environment and vice versa. This record should be made available for public review.

When conducting an annual Environmental Review, it is important put the following exception on the document:

We are requesting a determination of 'Supplemental Assistance 'for this project (24CFR 58.35 (b) (7) This project does not trigger any environmental issues because it does not involve construction of any kind and will have no negative impact on surrounding environment. HUD's LBP regulations do not apply to hotel stays, RRH projects, or homeless shelters, so no action regarding LBP is required for this type of project.

Housing Criteria

Inspection (Housing Quality Standards-HSQ)

Before any assistance is provided on behalf of HP, Five County AOG will physically inspect each unit to assure that the unit meets HQS (initial home inspection) of 24CFR §982.401. Assistance will not be provided for units that fail to meet HQS and Lead-Based Paint, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and Five County AOG verifies that all deficiencies have been corrected.

If the landlord requests a rent increase, the Five County Association of Governments Case Manager will complete a Rent Reasonableness Form to determine whether the new rent is reasonable and if it falls within the FMR payment standard. Five County AOG will only provide rental assistance for units if the rent is reasonable and at/below the fair market rent. Five County AOG determines whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for other comparable units. Reasonable rent cannot exceed rents currently being charged by the same owner for comparable unassisted units. If the landlord's rent increase is denied because it is not reasonable, does not fit within the FMR payment standard, or because the unit doesn't pass the home inspection, the landlord and the client will be notified to explain the basis for the unit denial. If the landlord states they can get the unit to pass the home inspection, due time will be given to the landlord to do that. If the landlord or client wishes to enter another lease, a new lease and contract will be generated and signed and submitted to Five County Association of Governments – Community Action. The landlord may choose to sign a new lease and contract after initial lease expires, but it is not required. An initial 12-month lease is required.

(see 24CFR §982.401 for all the standards and acceptable criteria)

Health and Safety Standards

Units must meet basic health and safety standards to be eligible for Homelessness Prevention housing subsidy. Inspections may be completed by Five County AOG staff or authorized sub grantee recipients that have completed the Lead-Based Paint Training on the HUD website and be certified.

[see <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm> for training]

Lead Paint Inspection

In some instances, HUD requires LEAD Paint checks to be conducted and for clients to be given information about LEAD Paint. The Lead Based paint inspection sheet must be completed and any needed corrections must be satisfactorily completed prior to funding. All clients moving into a unit that was constructed prior to 1978 must be given the Protect Your Family from Lead Based Paint pamphlet in their preferred language (when available). The English version of that pamphlet can be found at

<https://www.epa.gov/lead/protect-your-family-lead-your-home-english>

This packet will be attached to the Renter Toolkit to be given to the client prior to move-in.

Fair Market Rents

Fair Market Rent is determined by Housing and Urban Development (HUD). Five County AOG ESG Homelessness Prevention programs utilize rent reasonableness AND Fair Market Rent.

Fair Market Rents can be viewed on the HUD website at:

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2021_code/select_geography.odn?data=2020&fmrtype=%24fmrtype%24

Units above 100% of the Fair Market rent will not be funded.

Rent Reasonableness

Units above 100% of the Fair Market rent will not be funded. However, if the unit falls at/below the Fair Market Rent, rent reasonableness will apply. The case manager still has to complete a Fair Market Rent sheet. Rent Reasonableness is determined by local markets. Five County AOG ESG Homelessness Prevention programs utilize rent reasonableness AND Fair Market Rent. The FCAOG staff must complete a rent reasonableness form for every unit funded, even when the unit falls under the Fair Market Rent. The staff must find 3 comparable units and complete the Rent Reasonableness form. If a client is already

housed and wanting to access the Homelessness Prevention funding, their unit must fall at/below the Fair Market rent (utilities included) or want funding for a new unit that will be at/below the Fair Market rent.

- a. To calculate utility allowances on the “Rent Reasonableness Form”, use this as a general guide:
 1. 3-bed units = \$125.00 a month for utility allowance
 2. 2-bed units = \$100.00 a month for utility allowance
 3. 1-bed units = \$75.00 a month for utility allowance
 4. Studio unit = \$50.00 a month for utility allowance
 5. Room rentals = \$30.00 a month for utility allowance

(see [Rent Reasonableness Form](#))

Client Choice

Clients are to have as much say in their housing as possible. Clients must be listened to and have as much participation in housing as possible. Most clients applying for Homelessness Prevention funding must also have a unit that is at or below the Fair Market Rent, even if they qualify otherwise. Another option is to rehouse an eligible applicant into a unit that can be funded by Homelessness Prevention.

Permanent Housing

The main goal of Homeless Prevention is to work alongside the client(s) in sustaining housing with the understanding that the client(s) will meet with case manager(s) monthly, not violate their lease, and pay their portion of the rent. If the client does not pay their rental portion, rental assistance will not continue, but case management can. Five County strives to avoid creating dependency while empowering clients to achieve their potential. Case Managers will have ongoing conversations with the client about satisfying their lease requirements to avoid eviction and making and achieving goals the client has set for themselves.

The client (and all household members) must be on a lease (12 months) initially, signed by the owner or property manager. No subleasing is allowed.

- a. Best practice is to have all new household member’s information within 90 days of when that household member moves into the funded unit. This includes the new household member’s income (15th of the month to 15th of the month)
- b. If there’s a situation where the adults in the household are separating and requesting to receive continued funding, the person with the highest need to continue to receive this assistance. Individual SPDAT scores will determine the highest acuity (highest score on the SPDAT means higher acuity).

Part of the Housing Landlord Agreement must include the VAWA Lease Addendum signed by the owner or property manager and the tenant/client. In ideal situations, the property manager or owner signs the VAWA Lease Addendum. If the property manager/owner refuses to sign the VAWA Lease Addendum part of the Landlord Agreement, it’s acceptable for:

- b. The 12-month lease to contain the VAWA Lease Addendum language, signed by both parties.
- c. That be waived to honor client choice.
 - 1) If the landlord, property manager, or owner refuses to sign the VAWA Lease Addendum, the client is to be told about this.

- 2) The client will be informed about how this refusal puts them at risk of losing housing, especially for those who are survivors of domestic violence, sexual assault, or any other type of power and control exerted by someone else.
- 3) It's the client's choice in the end.

Rent Adjustment(s)

Five County strives to avoid creating dependency while empowering clients to achieve their potential. FCAOG CAP also strives to help the clients build a habit of prioritizing their housing, therefore, funding normally requires the client to pay a portion of their income toward their rent. Some flexibility is given to client's in order to stay housed while they apply prioritizing their housing.

Lease Requirements

Each program participant receiving rental assistance must have a legally binding written lease for the rental unit. Lease should state that it is renewable but can be terminated for "cause" only.

For program participants living in housing with project-based rental assistance, the lease must have an initial term of one year. If the assistance is solely for rental arrears. At a minimum, the lease must:

Be between the owner and the program participant as the tenant;

Identify the address/unit where the program participant will reside;

Identify the terms of the agreement (i.e., dates of tenancy, monthly amount due, grace period, etc.); and

- c. Be signed and dated by both parties 24 Emergency Solutions Grant

Where the assistance is solely for rental arrears, a financial statement from the owner may be accepted in place of a written lease if:

- a. There was a lease agreement when the client lived there. FCAOG staff will collect the previous lease for which the funding is requested.
- b. Rent(s) owed are sufficiently documented by the owner's financial records:
 - i. rent ledger(s)
 - ii. canceled check(s)

The owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction action against the program participant

Eligibility

All clients must meet the eligibility requirements of homelessness prevention

1. Has an annual income below 30% of median family income or the area at https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_IncomeLmts_State_UT_2022.pdf
2. Does NOT have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place.
3. Homelessness Prevention is targeted to people at risk of homelessness. Specifically, this includes those that meet the criteria under the "at risk of homelessness" definition at §576.2, as well as those who meet the criteria in paragraphs (2), (3), and (4) of the "homeless" definition – also

found at §576.2 – and have an annual income below 30% of family median income for the area.

[At a Glance Criteria for Definition of At Risk of Homelessness \(hudexchange.info\)](#)

[At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless](#)

[\(hudexchange.info\)](#)

[eCFR :: 24 CFR 576.2 -- Definitions.](#)

4. Has not exceeded the funding limits: In situations where the client has been previously funded with HUD funds and they're back on the HMIS By Name List (to possibly be chosen for more funding), FCAOG will not re-fund households that have exceeded the 24 months of assistance in a 3-year period. A quick HMIS search of every homelessness prevention applicant will ensure this has been met. Also, add a screenshot of that search in the client's folder. Third-party verification using HMIS records has been the departmental preference since July 1, 2016. The department head will work with case managers to ensure due diligence in obtaining this documentation.

Selection Criteria Process

When there are more applicants than funding, clients will be prioritized off the applicant screening score, with those who have a higher score getting the assistance first.

Anyone is invited to apply for ESG HP if they meet the initial criteria. However, not everyone that qualifies will get funding due to limited funding. Applications are collected until the next application selection committee. Applications are reviewed and scored by the committee based on priority of need and availability of funding. Once an applicant is chosen to receive ESG HP, the case manager will reach out to the client within 5 days of selection. The applicant then has 30 days from date chosen to complete the intake process and complete a case plan with the case manager. All case plans must be input into HMIS and updated frequently.

Applicants that were not chosen in the first round are welcome to stay in the pile of applications to be considered when the application selection committee meets again if they want to remain being considered. Case Manager is to contact all approved and denied applications within 5 business days.

As there will only be 4 spots filled every 5 months, this funding is incredibly limited and will serve the most acute households.

Program Participant Records

[Documenting Client Eligibility for Homelessness Prevention](#)

There is a requirement that the eligibility of all program participants be collected before acceptance into a homelessness prevention program. To meet this requirement, documentation should be gathered at intake and every 3 months. Documentation must follow the prescribed order of documentation and the forms/supporting documents must be complete. The preferred order of documentation is: 1) Third-party Verifications, including written and source documentation, and HMIS records; 2) Intake worker observations, certified in writing and retained in client file; 3) Self-Certification from persons seeking assistance with documentation of the intake worker's efforts to obtain third-party verification and reasoning why it was not able to be obtained. Case manager should complete the Five County AOG Community Action Check List form for the homelessness prevention program to collect other pertinent, but not required, documentation.

Part of the Staff Certification of Eligibility includes a conflict-of-interest statement. If there are conflicts that exist between the program participant and/or the case manager or department head, those conflicts must be disclosed to the supervisor. A new staff member will be assigned to work directly with this program participant, if the conflict is with the direct staff. If the conflict is with the supervisor, the direct staff will work with the deputy director on any decisions made concerning this program participant.

As part of the application process, the client may have to answer more questions than required with HMIS, but that's also so they can qualify for other funding sources (CAP60 required questions) and any other services Community Action offers. Additional elements collected for non-UHMIS programs are not entered into UHMIS, and only the minimally required data elements are entered into UHMIS. Special circumstances can be staffed with the Community Action Director, when applicable.

All client records must have the following documentation in their file that qualifies them for the homelessness prevention program (listed in priority):

1. Source documents: Notice of termination from employment, unemployment compensation statement, bank statement, utility bill showing arrears
2. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both criteria of the definition of "at risk of homelessness";
3. If source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence.
4. A screenshot of their HMIS dashboard that the client has not exceeded the 24 months of funding in a 3-year period. All clients must be input into HMIS, as well.

AT RISK OF HOMELESS – DEFINITION (24 CFR § 576.2)

Category 1 – Individuals and Families

An individual or family who:

- Has an annual income below 30% of area median family income for the area; AND
- Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
- Meets at least one of the following 7 conditions:
 - Has moved because of economic reasons 2 or more times during the 60-days immediately preceding the application for assistance _
 - Is living in the home of another because of economic hardship
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals_

- Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room
- Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution) _
 - h. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the sub recipients approved Con Plan

Category 2 - Unaccompanied Children and Youth

A child or youth who does not qualify as homeless under the homeless definition but qualifies as homeless under another Federal statute.

Category 3 - Families with Children and Youth

An unaccompanied youth who does not qualify as homeless under the homeless definition but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with him or her.

Section 725(2): Children and youth who have 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.

Examination of Income

Income is calculated in accordance with 24 CFR 5.609 & 24 CFR 5.611 (a) Five County AOG examines the household income initially and no less than every 3 months.

(see forms for Self-Declaration of Housing status)

(see forms for Homelessness Prevention Certification)

(see forms for Staff Certification of Eligibility)

(see forms for Check List w HEARTH ACT for FCAOG Community Action)

Recertifications

If clients receive assistance for three months, they must complete a Recertification to receive up to 3 more months of assistance. The household must provide 30-days of income to verify they still meet the 30% AMI mark to continue with the program and that they are still in a housing crisis without proper supports. Income is collected from the middle of the month to the middle of the month (15th to the 15th), to fall in line with the client's quarterly income submissions. Staff should utilize the HP Recertification sheet and place in client file.

Along with signing the HP Recertification sheet and the "family printable documents" sheet on CAP60 (once CAP60 is updated with current information).

Tracking Recertification dates

Case Manager must track when the client's recertification is due in accordance with HUD requirements, on a quarterly basis, client's income and household composition of all participants will be reexamined, exactly 90 days from enrollment date. 30 days prior to the re-certification due date, the Five County Association of Governments will contact the client's case manager (only if being case managed by

another person) to inform them of the upcoming renewal. The income will be due/collected until the 30-day letter is sent out. If the client does not complete the re-certification after the 10-business day deadline of the 30-day notification letter, the landlord may be notified that rent may be placed on hold until completion of the re-certification and/or the rent will be terminated if the client fails to submit needed documentation. The 30-day notification deadline will extend to the end of the month that the recertification date is and will require income. It will also notify the client of the date the grant will no longer fund them if they fail to submit needed documentation or exceed income limits. The 30-day notification letter will be issued using two ways of communication to the client (i.e. certified mail and client's email). Best practice will also have the client's case manager verbally inform them of the upcoming recertification. The client's case manager will also be emailed the letters. Best practice is for the certified letter to go to the last known address of the client via certified mail (certified mail marked "restricted delivery") or having the client sign the notice and email notice and email or bring in the signed notice to the case manager.

Documents Required from the Client

The client will receive notice of the required re-certification with the forms to be completed. The case manager will work with the client to complete this packet, upon request within the 30-day specified time frame.

The client's submitted income or self-declaration of no income will be input into CAP60. The client will be told whether their income and situation qualifies for future assistance.

If there's no response within that stated period, a termination letter will be sent to the client with an appeal form, which give the client 10 business days to appeal the decision with Five County Association of Governments. In accordance with 24 CFR 582.310(b)(3), as a condition of participation in the program, each client must agree to supply the information or documentation necessary to verify the client's income.

(see forms CAP60 ELIGIBILITY SHEET –must be signed by the client)

(see forms [WARNING LETTER TEMPLATE](#))

(see forms [TERMINATION LETTER TEMPLATE](#))

Case Plan

A case plan is a basic goal setting sheet to keep track of what FCAOG CAP is doing with a client. It shows the basic information and goes through what the plans focus is. It will also help to break up the plan into more attainable parts. The plan should be created and entered into HMIS within 30 days of enrollment date. The plan should help track what the client is doing, and how much they are getting done. The final part of the plan holds them accountable and helps them take ownership by having them sign and date their agreement. It is important to make sure that case management is used to follow up with clients on a regular basis to review the case plan. In this template are a few examples of what can/has been done in an actual case plan.

Housing Stabilization Plan

For ESG Homelessness Prevention programs, emphasis is placed on housing stabilization plans rather than case plans. This connotes the notion of housing first which is not applicable to all department or agency programs. These plans cannot remove a client from housing due to non-compliance. It also reinforces housing stabilization as the first step towards self-sufficiency.

All clients are allowed flexibility in designing their housing stability plans, which means they have the discretion to establish their own goals. They also are allowed discretion regarding being required to participate in certain services to move toward their goals after being housed. Their goals should always have a Housing First and housing stability approach. Clients are required to participate in supportive services as a condition of continued program participation including participation in substance abuse treatment services and mental health services). If the client is terminated due to not participating in substance abuse treatment, they have the right to go through the appeals process. See [CoC and ESG Additional Requirements - Required Participation - HUD Exchange](#) for more information. See appeals process. Case Managers should meet with clients monthly to review the housing stabilization plans with the client (see 24 CFR 576-401€(1)(i)) and provide referrals to any needed physical health, mental health, or other social programs they may need assistance from.

Client Participation

Within ESG Homelessness Prevention and all other Community Action programs, clients should have “maximum feasible participation” in interactions with the department and agency. ESG Homelessness Prevention clients should have strong input into their housing stabilization goals and living situations, be invited to participate in policy decisions (such as the CSBG tripartite board [a.k.a. Human Services Council] or EFSP board), and have access to customer satisfaction surveys. Clients should also be empowered to understand the grievance process at the beginning of enrollment (see FCAOG application). Clients must agree to meet with a case manager at least once a month.

(See Case Management Plan for more information)

Corrective Action Period

If client(s) do not pay their portion of the rent to the landlord during the time of funding, they must be presented the opportunity to correct these actions. The case manager must communicate with clients via two different mediums and provide 10 businesses days for clients to come into compliance (warning letter).). The warning letter must fall on Monday through Thursday only at 5:00 p.m. only because the CAP office isn’t open on Fridays for walk-ins. One medium must be certified mail sent USPS with the receiver being the client by check marking the “certified mail restricted delivery” on the certified mail slip (green) when the case manager has an address for that client.

If clients fails to satisfy the warning letter with the basic requirements of the program, they must be given a standardized termination letter/email/communication and provide information on the appeal process with a 10-business day deadline.

Exceptions from this rule are when client(s) are no longer eligible due to AMI levels, when a client verbally agrees to close the case, or when the client disappears and the case manager has no known address for them. Case managers should help transition exiting clients as much as possible (although may have case management for six months afterwards).

Exit planning

To the extent possible, clients should be set up with an exit safety plan with emergency shelters and other agencies.

Client chooses to end enrollment

Clients have the right to end participation in the program at any time. Client should provide verbal or written notice to case manager. In these instances, there will not be an appeal process.

Client disappears

When the case manager is not able to connect with client (after making several attempts and noting it in the case notes) and the client has no known address and isn't responsive to emails or calls, the client will be exited with no exit planning.

Due process

In terminating assistance to a program participant, Five County AOG will provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process consists of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; **[see consent to participate]**
- Written notice to the program participant containing a clear statement of the reasons for termination; **[see the warning letter template and termination letter template]**
- 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
- Prompt written notice of the final decision to the program participant.

Hard-to-house populations

Five County AOG exercises judgment and examines all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

Emergency Transfer Policy -24 CFR 578.7(d)

(see Rapid Rehousing Policies)

Service Animals

(see Rapid Rehousing Policies)

Data Quality:

(see Rapid Rehousing Policies)

Landlord Outreach

(see Rapid Rehousing Policies)

Housing / Utilities

Move-in Payments

ESG Homelessness Prevention funding can cover move-in costs IF the client is moving into a permanent unit. This includes short-term (up to 3 months) and/or medium-term (4-24 months) tenant-based rental assistance, rental arrears (one-time payment of up to 6 months, including any late fees for the tenant's portion of the arrears), rental application fees, a security deposit, advance payment of last month's rent, utility deposits and payments, housing search and placement, housing stability case management, mediation, and credit repair.

Prior to the client moving in, a home inspection form must be satisfied and the unit must pass the inspection.

(see forms for HOME INSPECTION-PERMANENT HOUSING STANDARDS)

(see forms for HOME INSPECTION-LBP DISCLOSURE STATEMENT)

(see form RENTAL TOOLKIT)

Back rent in collections

ESG Homelessness Prevention funding can cover back rent (arrears of up to 6 months), but not if they're already in collections.

Rental Subsidy

The rent payments will go as follows:

- d. **First month of funding:** 100% of the rent will be covered by the Homeless Prevention grant. The client will not need to pay anything toward their rent this month.
- e. **Second month of funding:** 75% of the rent will be covered by the Homeless Prevention grant. The client will need to pay 25% of the rent this month. If the client is unable to pay 25% of their rent, flexibility will be provided to the client for this month.
 - 1. 25% of the rent will be broken up into payments for the 3rd and 4th month payments.
 - a. If the client doesn't make the 3rd month rent with the 2nd monthly payment included, they will not receive any more assistance.
 - b. If the client pays the 50% of rent + the 2nd month payments, they can continue to receive assistance, up to 6 months.
 - 2. The client will not have to pay the 25% of the rent for the 2nd month. However, the client will not receive the 4th or 5th month of rent.
- f. **Third month of funding:** 50% of the rent will be covered by the Homeless Prevention grant. The client will need to pay 50% of the rent this month.
- g. **Fourth month of funding:** 25% of the rent will be covered by the Homeless Prevention grant. The client will need to pay 75% of the rent this month.
- h. There is an option for a **fifth month** of assistance, but only on Director approval. For the fifth month, the grant will pay 25% of the rent will be covered by the Homeless Prevention grant. The client will need to pay 75% of the rent this month.

On all month's but the first, the FCAOG staff is to cut the check for the percentage of the rent, not the full rent. The client is required to pay the landlord directly for their portion. FCAOG must contact the landlord each month to ensure the client paid their portion.

The Case Manager will not pay any future rent for the client without any communication from the client or if they don't pay their rental portion. The case manager must document (in case notes) all attempts at contacting the client for case management. Contacts can be through phone, email, home visits.

If a client is rehoused during funding, the funding does not change. For example, if a client uses two months of assistance and is moving their 3rd month of assistance, the rental contribution from the grant will still only be 50% of the rent. Rehousing is allowed as long as a client is moving to a cheaper unit or a unit that is only 30% of their income (if the rent is going to be higher than the original unit).

30-day vacancy Payments

ESG Homelessness Prevention funding allows for up to 30-days vacancy for situations like abandoning a unit, early move-outs, etc. The last month's rent can transfer over for the up to 30-day vacancy payment.

Client Rent Determination & rental portion Payments
(see **Rapid Rehousing Policies**)

Utility Subsidy

Unless the funding source and grant scope of work covers utilities, clients should pay their own utilities. However, in accordance to HUD guidelines, utilities paid for by the client may be deducted from client portion of rent (including utility deposits).

Case managers should also note when utilities should be covered by other funding when it becomes a barrier to remaining stably housed.

The program director may also authorize additional utility assistance as an incentive for participating in financial literacy, employment, and other programs.

LIHEAP Utilization

Case managers are required to inform clients about utility assistance offered by the Utah HEAT program (administered by Five County AOG in the region). **Clients are not required to utilize this service but should be referred to the program.**

Eviction Policy

Five County AOG has the goal of stabilizing clients in their housing. Case managers should review the tenant education resource packet with the client on their first month of funding. Landlord outreach should occur monthly-identifying and mediating poor tenant-landlord relations proactively where possible. However, this will not always be successful, and some clients may face eviction.

The client may not be terminated from the program if an eviction is made by the landlord.

In instances where clients become evicted because of alleged/documented poor tenant behavior, ESG Homelessness Prevention client(s) may be able to rehouse the client, even when eviction occurs, when appropriate and funding is available.

Multiple security deposits for the same client are allowable when a household must be relocated to a different unit (e.g., if FMR and/or rent reasonableness changes or if household composition changes). Any refund of the initial deposit must be returned to the agency, shown on the invoice disbursements journal as 'Program Income - Deposit Refund,' and reported on the CoC Annual Performance Report as Program Income.

In the event an ESG Homelessness Prevention client goes through the eviction process, the case manager will staff the case with the supervisor as to whether assistance will continue (please refer to policy on exiting program). Case managers should establish safety plans, work with the clients to identify new re-housing opportunities- if eligible and conduct a new SPDAT assessment as needed. If the client's case is closed and they fulfill the category 1, 3, or 4 of the HUD homeless definition, the case manager should offer to put the client onto the HMIS housing list and perform a SPDAT.

As a policy, relocation deposits, first/last month rent, and other related services will be offered as permitted by funding source. In some instances, a funding source may restrict additional deposit after one relocation or may not allow for damages to be paid from a specific grant. It is important during staffing that Five County AOG staff, sub grantees, and partners identify solutions to overcome barriers to rehousing, which may be using other available funding sources to rehouse a previous client.

Deposit Returns:
(see **Rapid Rehousing Policies**)

Master Leases:

(see [Rapid Rehousing Policies](#))

Essential Requirements for maintaining Program Participation

(see [Rapid Rehousing Policies](#))

When initiating termination proceedings, the recipient must:

FCAOG limits funding termination only in the most severe cases. When terminating hard-to-house homeless individuals, recipients and subrecipients must exercise judgment and examine all extenuating circumstances when determining if violations warrant termination.

- Provide the program participant with a written notice including the reason(s) for the termination. Clients must have ample time to address concerns before termination is initiated, which is at a minimum 10 business days (when the Community Action Department is open for business). The deadline can be extended for amount of days that the client was institutionalized during the “warning letter” period (with documentation of number of days). However, termination occurs with any institutional stay after 90 days.
- Allow for a review of the termination decision, which includes allowing the program participant to provide written objections. Note: The review cannot be conducted by the person who made the original termination decision or a subordinate of that person.
- Provide prompt written notice to the program participant after the final determination has been made via certified mail and another communication method.
- Termination under this section does not bar Five County AOG from providing further assistance later to the same individual or family.

Late Fees

Five County will not pay late fees due to a client’s negligence (not returning documentation before the case manager’s deadline or not recertifying before their rent is due). In cases of negligence, clients must pay their own late fees. A one time payment for rental arrears with late fees is allowed, but not after the first month of funding.

If the client does not pay their rental portion by 5:00 p.m. on the 5th of every month, a \$10.00 late fee will be assessed. In the event that the 5th of the month falls on a Saturday or Sunday, payment is expected the following Monday.

Case Manager Safety & Mandatory Reporting

(see [Rapid Rehousing Policies](#))

Exiting Clients from Program

Discontinuation Based on Poor Tenant Behavior

Five County Association of Governments expects tenants to abide by the terms of their lease. As such, case managers should review the tenant education resource packet and terms of the lease agreement with their client to help support good tenant behavior and set the client up for future success. Five County Community Action staff should problem solve/staff cases in instances where alleged client behavior risks eviction.

If a case manager determines that a client is breaking a lease, it is the duty of the case manager to encourage the client come into compliance with the lease, if possible. RRh staff may inform the landlords or the landlord advocate FCAOG of the concern.

Client does not meet the Minimum Requirements

Although Five County will not use eviction or failure to meet a case plan as a basis of termination, all clients are expected to meet the following requirements:

Submit income verification documents and pay their portion of the rent (including pet fees)

Clients are expected to pay their portion of rent. Income is collected from the beginning of the month to the end of the month. All pet (except for service animals) fees are to be paid by the client in addition to the rental portion amount will be paid directly to the their landlord, unless protected explicitly by the Fair Housing Act or state law.

Income is not collected monthly, rather at intake and the 3rd month of funding. This is so when the FCAOG staff exits the client, they have income to input.

Actively engaged in obtaining housing

If no application fees are paid, no housing searches are done by the client, client fails to follow through with potential housing/landlords, etc. client will be exited from the program after 30 days of enrollment date.

Temporary Assistance for Needy Families (TANF)

Rapid Re-Housing and Homeless Prevention Policies

Policy on One-time Assistance

Five County Association of Governments Community Action strives to serve as many clients experiencing one-time housing emergencies as possible, with limited funding and staff capacity. The duration and extent of assistance is dependent on available funding and grant stipulations. Temporary Assistance for Needy Families (TANF) funds absolutely prohibit any re-funding for the same housing crisis.

TANF funding allows for up to a maximum of four (4) months of rent and utility payments, including rental arrears. Clients who qualify for, or are deemed categorically eligible for the TANF program, are not automatically guaranteed funding.

Residents of the Five County area can apply for TANF assistance on our website or in person in our office.

In order to maintain Five County's relationships with landlords, Five County will absolutely not provide repeat assistance to individuals who provided falsified documents, or fail to comply with program requirements. This includes tenants who become ineligible for assistance due to poor tenant behavior as identified in the "Discontinuation Based on Poor Tenant Behavior" sub-section.

Rental Subsidy

The rent payments will go as follows:

- a. **First month of funding:** includes application fees, utility deposits, and move-in costs (for RRh). One month of rental arrears, if necessary, count as a month of assistance (HP).
- b. **Second month of funding:** Current rent due (HP). Client may be expected to contribute to their rent. A signed, written lease must be submitted to FCAOG in order for the 2nd month to be funded.

On all month's but the first, the FCAOG staff is to cut the check for the percentage of the rent not being paid by the client, not the full rent. The client is required to pay the landlord directly for their portion. FCAOG should contact the landlord each month to ensure the client paid their portion before any more funding occurs.

The Case Manager will not pay any future rent for the client without any communication from the client or if they don't pay their rental portion. The case manager must document (in case notes) all attempts at contacting the client for case management. Contacts can be through phone, office visits, or email.

Fair Market Rents

TANF can fund units at 150% of Fair Market Rent, which is determined by Housing and Urban Development (HUD). Fair Market Rents can be viewed on the HUD website at:

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2021_code/select_geography.odn?data=2020&fmrtype=%24fmrtype%24

Client Choice

Clients are to have as much say in their housing as possible. Clients must be listened to and have as much participation in housing as possible. Most clients applying for Homelessness Prevention funding must also have a unit that is 150% of Fair Market Rent, even if they qualify otherwise.

Utility Subsidy

Clients are expected to contribute to their utility bills and be denied by the HEAT department prior to requesting utility assistance. A maximum of \$500.00 can go toward the client utility bill

Case Plan

A case plan is a basic goal setting sheet to keep track of what FCAOG CAP is doing with a client. It shows the basic information and goes through what the plans focus is. It will also help to break up the plan into more attainable parts. The plan should be created and entered into HMIS within 30 days of enrollment date. The plan should help track what the client is doing and define the amount of assistance TANF will pay each month. The final part of the plan holds them accountable and helps them take ownership by having them sign and date their agreement. It is important to make sure that case management is used to follow up with clients on a regular basis to review their case plan. Case plans should be reviewed at least monthly with the client. All clients are allowed flexibility in designing their own case plans, which means they have the discretion to establish their own goals. They also are allowed discretion regarding being required to participate in certain services to move toward their goals after being housed, except for employment. Their goals should always have a Housing First and housing stability approach. If the client is terminated due to not completing their case plan, they have the right to go through the appeals process. Case Managers should meet with clients monthly to review the case plans with the client (see 24 CFR 576-401€(1)(i)) and provide referrals to any needed services.

[See appeals process]

Selection of TANF Clients

Anyone is invited to apply for TANF if they meet the initial criteria. However, not everyone that qualifies will be approved due to limited funding. Households must be homeless, or at risk of homelessness. Applications are collected until the next application selection committee. Applications are reviewed and

scored by the committee based on priority of need and availability of funding. Once an applicant is chosen to receive TANF, the case manager will reach out to the client within 5 days of selection. The applicant then has 30 days from date chosen to complete the intake process and complete a case plan with the case manager. All case plans must be input into HMIS and updated frequently.

Applicants that were not chosen in the first round are welcome to stay in the pile of applications to be considered when the application selection committee meets again if they want to remain being considered. Case Manager is to contact all approved and denied applications within 5 business days. Before the applicant is reconsidered, the case manager must call the applicant to see if their situation has changed and edit the screening/scoring sheet when necessary.

Recertification for TANF Clients

In order for a household receiving TANF rental/utility assistance to recertify for additional assistance after the first month, the applicant must show progress towards becoming self-sufficient. This includes creating an employment plan with the referred DWS Employment Counselor, communicating regularly with your CAP Case Manager, and scheduling your recertification appointments in a timely manner that will allow for evaluation and approval.

Each client will create an individualized case plan with their case manager outlining the one-time crisis and the client's plan to resolve the situation and avoid a repeat. The plan should be created and entered into HMIS within 30 days of enrollment date. Based on the individual case plans and financial ability, a client/household may be responsible for a portion of their own rent and will be asked to show proof of any payments they have been making toward other obligations that impede their ability to pay their full rent on their own.

If/when tenant rent is to be paid by TANF, tenant will be responsible to pay their portion before TANF will pay the remainder.

Late Fees

Five County Community Action can pay certain late fees when they are associated with a housing crisis, such as a loss of employment. However, Five County will not pay late fees due to a client's negligence (not returning documentation before the case manager's deadline or not recertifying with enough time before their rent is due). In cases of negligence, clients must pay their own late fees, even if you are approved for TANF recertification.

If the client does not pay their rental portion by 5:00 p.m. on the 5th of every month, a \$10.00 late fee will be assessed. In the event that the 5th of the month falls on a Saturday or Sunday, payment is expected the following Monday.

Paying Past Rent/Utilities in Collections

TANF cannot pay any past utilities or rent that have already been sent to collections.

Early Termination of Funding

Verification of tenant offenses can be submitted by landlords or verified by a case manager for funding to end before the four months is up. If a client is denied additional TANF funding, the client may file an appeal to the Director of Community Action within thirty (30) days from receiving notification of termination of funding.

Verification of offenses can be submitted by landlords or verified by a case manager. If a client is denied additional TANF funding due to the listed infractions, the client may file an appeal to the Director of Community Action within thirty (30) days from receiving notification of termination.

Discontinuation Based on Poor Tenant Behavior

Five County Association of Governments will stop all funding and services, as well as any future funding, if it is found that any household member is engaging in the following activity:

1. Not taking responsible care of the property Five County helps you rent.
2. Not abiding by all the terms of your lease agreement (i.e. no smoking, pets, excessive noise during quiet hours, etc.).
3. Increasing the number of occupants specified on your rental agreement without written permission by the owner.
4. Being charged with abuse/domestic violence toward anyone in your home.
5. Partying at the rental, leading to police being called to the rental.
6. Being charged with the use, selling, or allowed use of illegal drugs on the premises.

Verification of offenses can be submitted by landlords or verified by a case manager. If a client is denied additional TANF funding due to the listed infractions, the client may file an appeal to the Director of Community Action within thirty (30) days from receiving notification of debarment.

Due process

In terminating assistance to a program participant, Five County AOG will provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process consists of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; **[see FCAOG application]**
- Written notice to the program participant containing a clear statement of the reasons for termination, which is done through emails.
- 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
- Prompt written notice of the final decision to the program participant.

TANF Income Policy Requirements

1. Categorical Income Eligibility can be used to determine whether a customer is income eligible for TANF Needy Family contracted services. A customer may be considered categorically eligible for TANF Needy Family funds if they are currently a recipient of one of the following programs:

- a. Family Employment Plan (FEP)
- b. FEP Diversion during the 3-month diversion payment period

- c. SNAP (Food Stamps)
- d. Family Medicaid programs for which the total household income must not exceed 200% of the Federal poverty level.
- e. CHIP Plan B, or C
- f. Refugee Cash Assistance
- g. TANF Non-FEP Training
- h. Women, Infants, and Children (WIC)

A customer meeting categorical eligibility for income must meet all other eligibility criteria.

2. Income eligibility is based on the Monthly Income Guidelines Chart. Total parent or relative caretaker income cannot exceed the income requirement of the contract or service being provided, and cannot exceed 200% of the federal poverty level. The state TANF Program Specialist must be contacted for approval if a contracted service will exceed 200% of poverty. The TANF Needy Family must meet the eligibility criteria outlined on Form 300.

See TANF Needy Family Income Guidelines on DWS website: [Obsolete \(1/13/21-1/12/22\) 726 Income Guidelines: TANF Needy Family - Contracted Services \(utah.gov\)](#)

Citizenship and Residency

Customer must be a U.S. citizen or an employment eligible non-citizen to be eligible for TANF funded services.

- A U.S. citizen includes individuals born in any of the 50 states, the District of Columbia, Puerto Rico, Guam, the Virgin Islands, the Northern Mariana Islands, American Samoa, and Swain's Island. It also includes naturalized individuals.
- When a child is born outside the United States to a person that is a U.S. citizen, the child is also considered a U.S. citizen. Minor youth may acquire citizenship by virtue of a parent becoming a naturalized citizen. See section 215-1 in the DWS Eligibility Manual for more information regarding citizenship for minor youth.

If a household member is not a US citizen, you must exclude them from the household size. All income will be counted toward household income, regardless of citizenship.

Household Composition

Family size and income determine poverty level of the family. A family is a group of individuals living together related by blood, marriage, or decree of court. A household must include at least one eligible dependent child, or a woman pregnant and in her third trimester. The pregnancy due date must be verified.

Members to be included in the TANF Needy Family household size are:

- a. Natural and/or adoptive parent(s) or stepparents or relative caretaker(s) who are related to and residing in the same household with their eligible minor dependents.
- b. Relative caretakers include:

- i. Grandparent(s)
- ii. Aunt(s) and uncle(s)
- c. Eligible minor dependents in the family include all minor siblings, half-siblings, and adopted siblings living in the same family household.
- d. Relationship to the parent(s) or relative caretaker(s) for all minor dependents listed in the family household must be present in the case file.

Social Security numbers must be provided and verified for all family members who are included in the TANF Needy Family household.

Inspection (Housing Quality Standards-HSQ)

Before any assistance will be provided on behalf of TANF RRH or HP, Five County AOG staff will physically inspect each unit to assure that the unit meets HQS (initial home inspection) and Lead-Based Paint requirements.

Assistance will not be provided for units that fail to meet HQS and Lead-Based Paint requirements, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and Five County AOG verifies that all deficiencies have been corrected.

Five County staff member must complete the HUD Lead Based Paint Visual Assessment Training before completing any inspections at <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Poverty Programs

Social Services Block Grant (SSBG)

Housing Assistance

Introduction

Housing is an allowable activity under **SSBG** federal guidelines. Currently, the Utah Department of Human Services does not provide additional guidelines to local government discretionary funds which come to FCAOG.

Housing Supports / Allowable Activities

Housing Services

Housing services are those services or activities designed to assist individuals or families in locating, obtaining, or retaining suitable housing. Component services or activities may include tenant counseling; helping individuals and families to identify and correct substandard housing conditions on behalf of individuals and families who are unable to protect their own interests; and assisting individuals and families to understand leases, secure utilities, make moving arrangements and minor renovations

Independent and Transitional Living Services

Independent and transitional living services are those services and activities designed to help older youth in foster care or homeless youth make the transition to independent living, or to help adults make the transition from an institution, or from homelessness to independent living. Component services or activities may include educational and employment assistance, training in daily living skills, and housing assistance. Specific component services and activities may include supervised practice living and post-foster care services.

Protective Services for Adults

Protective services for adults are those services or activities designed to prevent or remedy abuse, neglect or exploitation of adults who are unable to protect their own interests. Examples of situations that may require protective services are injury due to maltreatment or household violence; lack of adequate food, clothing or shelter; lack of essential medical treatment or rehabilitation services; and lack of necessary financial or other resources. Component services or activities may include investigation; immediate intervention; emergency medical services; emergency shelter; developing case plans; initiation of legal action (if needed); counseling for the individual and the household; assessment/evaluation of household circumstances; arranging alternative or improved living arrangements; preparing for foster placement, if needed; and case management and referral to service providers.

Protective Services for Children

Protective services for children are those services or activities designed to prevent or remedy abuse, neglect, or exploitation of children who may be harmed through physical or mental injury, sexual abuse or exploitation, and negligent treatment or maltreatment, including failure to be provided with adequate food, clothing, shelter, or medical care. Component services or activities may include immediate investigation and intervention; emergency medical services; emergency shelter; developing case plans; initiation of legal action (if needed); counseling for the child and the household; assessment/evaluation of household circumstances;

arranging alternative living arrangement; preparing for foster placement, if needed; and case management and referral to service providers.

Substance Abuse Services

Substance abuse services are those services or activities that are primarily designed to deter, reduce, or eliminate substance abuse or chemical dependence. Except for initial detoxification services, medical and residential services may be included but only as an integral but subordinate part of the service. Component substance abuse services or activities may include a comprehensive range of personal and household counseling methods, methadone treatment for opiate abusers, or detoxification treatment for alcohol abusers. Services may be provided in alternative living arrangements such as institutional settings and community-based halfway houses.

<http://www.acf.hhs.gov/programs/ocs/resource/uniform-definition-of-services>

Eligibility for SSBG programs include (having documented disability, being a victim of abuse, being over sixty, being homeless, or having drug addiction). Unlike with transportation assistance, meeting SSBG eligibility is not enough to receive housing assistance through Five County's extremely limited SSBG funding. Every effort must be made to house most vulnerable first, and it is highly encouraged for Five County staff to utilize the community housing list and coordinated assessment to determine who the most vulnerable are.

Social Service Block Grant (SSBG) Bus Pass Guidelines

Bus Passes - See transportation policies and procedures

Flexible Gas Voucher Program - See transportation policies and procedures

Community Services Block Grant (CSBG)

In using the application FCAOG CAP need to follow the CSBG Income Guidelines from the Department of Health & Human Services.

Eligibility

Income Eligibility

All clients receiving services or participating in programs that use CSBG funding must be able to demonstrate that they are eligible for the CSBG program and that the household gross income, of those 18 years or older (& out of high school), is **200%** or less than the federal poverty guidelines. * Income eligibility can be changed by the state. For example, during COVID-19, the federal poverty limit was changed to 200%. Current limits can be accessed at <https://aspe.hhs.gov/poverty-guidelines>

According to Community Action Program Legal Services (CAPLAW), the income of all members of each individual household unit must be included in determining income eligibility. A household unit is either (1) related individuals, or (2) an unrelated individual excluding house mates (renters or leasers).

(see definitions section for definitions of 'related individuals' or 'unrelated individuals')

If a household includes more than one household unit (i.e. doubled up families), the poverty guidelines shall be applied separately to each household unit, and not to the household as a whole (when a partial household is moving into a new unit, leaving behind some household members). When services are rendered to the entire household (water assistance, bus passes, etc.) the entire household must be one whole.

(see intake section of policies)

Deposit Assistance Program

One purpose of the Community Services Block Grant is to help overcome barriers to stability and self-sufficiency. If someone calls in requesting help with finding housing, the Five County staff member will make the rental list available to the caller (as staffing allows).

Many individuals who find affordable housing and can pay rent and/or utilities may not have deposits to move into affordable housing units.

Five County's Deposit Assistance Program **helps households below the 125% federal poverty guideline** (unless other guidelines are allowed by the funders, i.e. 200% during COVID-19 response) with one-time security and utility deposits who are moving into affordable units (per funding year). The amount of the deposit is based on funding availability per Director approval. It can also include a renter toolkit and case management.

What this program is:

- Deposits and rent given to landlords / utility companies directly. Both security and utility deposits may be funded (if they are a barrier to housing).
- Deposits for rentals that are around 30% of household monthly income (but not to exceed 50%, 60% including utilities). The agency can work with rentals with pending subsidized assistance with third-party verification from housing authority or property management (Permanent Supportive Housing or Rapid Rehousing clients).
- Help for working households in shelter who are not eligible for Rapid Rehousing assistance
- Help community members move into more affordable housing (save rent costs monthly).
- Help for low-income households moving **into** the area **for a new job** (employment verification required)
- Help doubled-up families in the area who are living in unsafe housing (too many individuals than what city code allows).
- One-time, once a grant cycle deposit into an affordable unit

- Utility Deposits may be funded for people who are already in their home (case by case basis)

What this program is **NOT**:

- On-going rental assistance
- Mortgage / down payment assistance (this program is for rentals only!)
- A method to move into housing which is not affordable and reasonable for the living situation (examples: rent is more than 50% of monthly income; a single person wanting to move into a house for the purpose of subleasing; a household of 6 moving into a studio apartment not meant for that many people; etc.)
- A method of moving household members from out of the area for non-employment reasons (such as for retirement).
- Funding for non-residents of the five-county area
- Funding units that have failed the Housing Quality or Lead Based Paint Standards for other grants.
- Security Deposit assistance for those who have already moved into a unit and have back deposits owed.

When candidates are qualified for deposit assistance, they will receive a deposit assistance landlord agreement form for their landlord to complete. The client, landlord, and case manager are required to sign the Deposit Assistance Landlord Agreement and decision letter/contract. They will also be asked to submit a signed copy of the lease, with the applicants name on the lease, before the deposit check will be mailed. Checks are mailed generally once a week. Best practice is for case managers to notice what household members are listed on the lease. All adults listed on the intake must be listed on the lease. Also, all adults listed on the lease must be listed on the FCAOG CAP application and have submitted their monthly gross income. If case manager finds one of these in error, client must satisfy intake or the lease prior to funding.

Five County AOG may provide deposit assistance to Permanent Supportive Housing (PSH) and Housing First providers (St. George Housing Authority, DOVE Center, & Canyon Creek Services) with appropriate master leases for clients. However, clients must be eligible for CSBG and SSBG and are subject to the deposit assistance policies and procedures as non-homeless deposit assistance clients.

Funding is limited and those showing greater self-sufficiency are prioritized.

[see Renter's Toolkit]

[see Deposit Assistance Landlord Agreement]

Prioritizing clients

Due to limited funding and excess of application submitted, Five County developed a prioritization criterion to be able to fund applicants that show more self-sufficiency.

The prioritization criteria are:

- Applicants rent falls at or below 125% of the current Fair Market Rent
- The rental unit falls at or below 30% of the monthly gross household income
- Has not received Community Action rental assistance in the last 12 months
- Scores a “4” in 4 or more applicable areas of the AZ Matrix (self-sufficiency matrix)

Applicants who meet the most of the above criteria will be funded first. Then, any remaining applicants may be funded with the remaining funds for the month. All funded applicants must meet at least one of the criteria, leaving room for exceptions. Staff member may staff exception with Community Action Director.

[see Fair Market Rent on HUD website]

[see AZ Self-Sufficiency Matrix]

Paying Past Utilities in Collections

CSBG can help with past utility bills, even when gone into collections, if it affects a client being able to move into a place or get their utilities turned on. When a client already has utilities on and they also have a past utility bill that has gone into collections, CSBG will not fund this bill as it does not affect their housing/utility.

Transportation Policies and Procedures

SunTran / CATS passes and vouchers

Introduction

The Social Service Block Grant (SSBG) and Community Service Block Grants (CSBG) assist low-income community members, victims of domestic violence, persons with disabilities, and seniors to **become or remain self-reliant**. Consistent with this goal, Five County Association of Governments uses SSBG funding to provide bus passes.

Eligibility

These bus passes are distributed to **eligible** clients through who follow these guidelines:

A voucher form must be completed for every bus pass issued: Even if a client has previously received a bus pass, ***a voucher form must be completed again for each new pass given to the client.***

Ensure that client is eligible to receive pass: Please do not issue bus passes to individuals who do not meet one or more of these criteria-

Income is below the 125% poverty line (for CSBG bus passes): Five County prefers to verify income through tax records, benefit letters (SSI/SSDI), or last 30 days (about 4 and a half weeks) of paystubs. If an individual does not qualify, encourage the rider to buy a discounted SunTran or CATS pass.

The client is a victim of domestic violence (for SSBG bus passes) – In instances where a client has fled domestic violence, income should not be considered as a factor for issuing a bus pass.

The client is 60 or older (for SSBG bus passes) – Seniors are not restricted by income eligibility. However, please note that Five County funding may be given directly to senior citizen centers for transporting these eligible clients. Please encourage seniors to utilize senior transit offered by senior citizen centers before offering a bus pass or the transportation voucher program offered through FCAOG's transportation program (medical appointments only). Another option could be Dial-a-Ride through Medicaid.

The client has disabilities (for SSBG bus passes) – Persons with documented disabilities are eligible without verifying income. However, please encourage the client to utilize TURN Community Services before issuing a bus pass. Another option could be Dial-a-Ride through Medicaid.

The client needs transportation to an agency to sign up for and/or receive a service (for SSBG bus passes) – In this instance, single ride passes should be issued if within the CATS area. Please call the service agency in advance to ensure that the client can be seen. Note that SunTran in St. George no longer provides Five County with single ride passes effective 11/1/14.

Bus passes are primarily given for employment support services.

Set a limit to the number of bus passes given to a single client: Five County wants to ensure that there are enough bus passes to go around. ~~Please do not give more than 10 CATS passes without the client having specific case management.~~ All SunTran & CATS monthly bus vouchers must have some form of case management from Five County, although the bulk of case management can be provided by other agencies (a copy of the case plan from the other agency). If additional passes are needed, ensure that the client is working towards providing their own transportation. If the client is not working towards self-sufficiency, please do not continue to provide free passes. Bus vouchers should not exceed 6 months in a funding year, but no more than 4 bus passes for those who haven't gained employment.

As these bus vouchers are monthly and never pro-rated, no bus passes will be given the last week of the month. Alternatively, give a bus pass for the following month. Best practice is to talk with the client if they're requesting a bus pass after the 15th of the month to get a full a month for the next month.

Gas Voucher Program

Vouchers are offered to clients who need a one-time assistance to help them with transportation for employment or medical reasons. Applicants must have an approved driver to be reimbursed. Applicant can be their own driver, but cannot claim mileage for private contract work (1099 tax deductible). Gas money is not given beforehand, instead it's a reimbursement. If a client lives near a bus stop, a monthly

bus pass will be issued instead. This voucher program is incredibly helpful to rural counties for medical reasons and employed people that live off the bus line but want to keep working.

Application Procedure

I. Client applies for Flexible Gas Voucher program by:

1. Filling out the Five County Community Action Intake and Consent Form. The applicant must explain in the self-sufficiency statement (pg. #4 in the Intake and Consent Form) a reason as to why they are traveling (i.e. employment, finding employment, medical, accessing human services, etc.).
2. Submitting Income Verification, must be at or below 125% of Poverty Guidelines (if applicant is **not** DV victim, have a verifiable disability, or be 60 years or older)
 - i. Last 30 days of income (pay stubs or SSI/SSDI sheet)
 - ii. Most recent tax returns.
 - iii. Include income from other programs (cash assistance, food stamps, etc.)
3. Submitting a current ID / driver's license if driver
 - i. Com Can be completed by phone or via Skype at client home or from food pantry/senior citizen center.
4. Applicant must choose driver(s) to receive reimbursement(s), if approved. The driver is chosen by the applicant, not Five County Case Manager.
 - i. Applicant must provide the driver(s) information to the Case Manager (name and contact information)
 - ii. Applicant can be the driver with approval in CSBG. Applicant cannot be the driver in SSBG.
 - iii. The driver must provide a copy of the valid driver's license and proof of auto insurance.
 - iv. The client may designate as many driver's as appropriate, provided all drivers have submitted their appropriate documentation **in advance**. No reimbursements will be given to drivers who provided transportation before being authorized.

II. Case manager verifies eligibility for the gas voucher program:

1. Applicant must be more than $\frac{1}{4}$ mile outside of a bus route for at least one stop.
 - i. If both of their stops are $\frac{3}{4}$ of a mile within a bus route, they are ineligible.

2. No Service Duplication

- i. If the applicant is a senior, can the senior citizen center or Five County's Transportation Program provide transportation for them?
- ii. If applicant is disabled, can TURN or Red Rock Center for Independence provide transportation?
- iii. If on Medicaid (not Medicare), the client should try to utilize LogistiCare Medical Services first.
 - 1. You must schedule LogistiCare appointments at least three business days in advance.
 - 2. The LogistiCare phone number is 1-855-563-4403.
- iv. Clients can be served once in a lifetime for employment support.
 - 1. If client applies 1 year for employment support, then the following year applies for medical reasons, this client can be served twice.
 - 2. If client resides in Beaver, Garfield, or Kane counties, they can be served once a grant phase, as transportation options are fewer in these rural counties.

3. Applicant must have an eligible reason for transportation (needs to be cost-effective for case manager - should be an ongoing transport or have a single trip more than 200 miles):

- i. Employment or seeking employment.
- ii. Accessing Human Services
- iii. Medical visits
 - 1. Only for seniors unable to use Senior Transportation and low-income households under 150% not on Medicaid
 - 2. Five County AOG's Transportation Department also offers medical gas vouchers
- iv. Ineligible reasons for transportation:
 - 1. Medical – If on Medicaid or if other senior transportations available
 - 2. Rides within St. George and Cedar City transit systems (although Community Action can assist with bus pass/bus voucher)
 - 3. DMV visits (CSBG's funding, as it's a one-time occurrence)
 - 4. Shopping is not an eligible reason for transport.

- a. Exception for clothing purchases directly related to job-seeking activities and picking up emergency food boxes
- b. Exceptions must be signed off by case manager in advance
- c. When driver is not reimbursed for side shopping trips, such side trips can still be integrated into trip by client and driver.

III. Case manager staffs case to see if applicant's driver could receive reimbursement

1. Case Manager and Director will decide which funding source will the reimbursements be paid with:
 - i. CSBG – 125% of poverty only.
Mostly intended to assist with employment-related assistance.
 - ii. SSBG – 125% of poverty or disabled, 60 years or older, or a domestic violence victim
Covers medical trips for seniors
2. Case Manager maps out total eligible mileage (starting point – usually applicant's home – to ending point). Client only receives mileage reimbursement for starting to end point, not stops in between those two points.

IV. Case manager contacts applicant on decision of their request

If applicant is approved:

1. The client can start to submit mileage to the case manager using the Flexible Gas Voucher Form after approval of funding
 - a. Mileage submissions can be submitted every 2 weeks
 - b. Mileage submissions must be submitted every 4 months
2. Approved driver(s) receive reimbursement. Checks are written and mailed to the approved driver. There is a cap of funding, based by location of applicant.
3. Client contacts case manager every time a Flexible Gas Voucher Form is submitted for reimbursement. Case manager checks to see if things are improving for them and on how their case plan is progressing.
 - a. Contact can be achieved by face-to-face visit, phone call, email, or video chat

V. Case manager verifies gas reimbursement forms through verification

1. Paystubs that cover the time requesting reimbursement
2. Case Manager contact the supervisor who signed the reimbursement forms to verify the days the client is claiming.
 - a. Case Manager makes a note on the reimbursement form of the date and person case manager spoke with to verify dates.
3. Case Manager contacts the office assistant of where the medical visit occurred and confirm the client was there on the date they claimed.
 - a. Case Manager makes a note on the reimbursement form of the date and person case manager spoke with to verify dates.

VI. After verification, case manager does a check request for the driver and mails the check. Case manager also informs the client of the approval.

Mileage reimbursements

1. Can be submitted for up to 1 year if applicant is in:
 - a. Washington or Iron Counties, a maximum of \$200.00 or 1 year (starting on the date of approval) is allowed, whichever comes first.
 - b. Beaver County, Garfield County or Kane County, a maximum of \$500.00 or 1 year is allowed, whichever comes first.

Outcomes

1. The case manager will provide 30, 60, 90, 120, 150, & 180 day follow-ups from the date of the first funding memo.
2. Low income / homeless clients will maintain / keep employment or increase their income
3. Low income / homeless clients will keep a job for 90 days
4. Seniors and persons with disabilities will receive medical care
5. Clients will become more self-sufficient, individualized.
6. Clients who is over the 125% of Poverty level should have their outcomes recorded in their case notes.
7. Clients who are at or below the 125% of poverty level should have their outcomes recorded both in CAP60 and in their case notes.
8. Homeless clients should have their outcomes recorded in case notes, CAP60, and HMIS.

Policies

The mileage reimbursement rate is \$0.40 per mile.

(See Forms Appendix for the Flexile Gas Voucher Form)

Water / Sewer Assistance Program

Application Process

- I. Client applies for the Water Assistance Program by:
 1. Filling out the Five County Community Action Intake and Consent Form. The applicant must explain in the self-sufficiency statement (pg. #4 in the Intake and Consent Form) a reason as to why they need water assistance.
 2. Submitting Income Verification must be at or below 125% of Poverty Guidelines
 - i. Last 30 days of income (pay stubs or SSI/SSDI sheet)
 - ii. Most recent tax returns
 - iii. Include income from other programs (cash assistance, food stamps, etc)
 3. Copy of a current ID
 4. Copy of water and sewer bill needing assistance with
 - i. Must be separated out from other bills (i.e. electric, trash, etc.)
 - ii. Water and sewage bill must be in the applicant's name
 5. Complete a case manager appointment (baseline assessment and other needs assessed)
 - i. Can be completed by phone or via Skype at client home or from food pantry/senior citizen center.
 6. Applicant must have water and sewage bill separated out from their electric bill.
 - i. Some city utility companies or HOAs can't do this. Those situations would make the client ineligible for service(s) in this program.
- II. Case manager verifies eligibility for water / sewer program (no trash, recycle program, and other city bills included on the bill)
 1. Applicant has a self-sufficiency plan which includes income to pay difference and ongoing bills.
 2. No Service Duplication
 - i. Client can be served once in a year with a general assistance amount not to exceed \$150.00 as long as there's a different self-sufficiency plan every time funding occurs.
 3. Ineligible reasons for water assistance:
 1. Deposit needed to turn on water
 2. No checks will be given to HOAs
 3. Just needs annual assistance and applies every year without a different self-sufficiency plan

4. The client will not be living in the unit after assistance is provided (i.e. pending eviction, client is moving soon, etc.)
5. **All exceptions must be signed off by case manager in advance in order to staff with director**

- III. Case manager staffs the case to see if applicant can receive water and/or sewage assistance and how much benefit amount.
- IV. Case manager contacts water and sewage provider and the client to let them know Five County AOG Community Action will cover some/most of the applicant's water and sewer bill.
 1. Checks are written directly to the provider only.
 2. After water and/or sewage bill is paid, case manager will complete 30, 60, 90, 120, 150, and 180 day follow ups.
 - i. If client hasn't used over \$150.00, the client can continue to work on case management and self-sufficiency plan to get another month of water / sewer assistance.
- V. Outcomes
 1. Low income clients will maintain affordable housing for 180 days
 2. Low income clients will increase/maintain their income for 180 days
 3. Low income clients will keep a job for 180 days
 4. Low income clients will achieve/maintain capacity to meet basic needs for 180 days
 5. Seniors (65yrs +) and persons with disabilities/chronic illness(es) maintained their independent living situation

Diaper Grant

Five County Association of Governments received funding from Community Action Partnership of Utah to provide integrated, whole-family, and trauma-informed services for families as part of the Diaper Distribution Demonstration and Research Pilot. The goal is to link whole family approach to more frequent and reliable diaper distribution. CSBG shall match the required 10% of the funding, which is \$6,000 for the entire funding year.

Five County AOG has chosen to store all the diapers at the Hurricane Valley Food Pantry and have all case managers and Community Action staff help with intake for families requesting diapers. Referrals from all other Community Action programs will also be occurring (i.e. Rapid Rehousing and TANF clients will be told about this program) as well as other programs within the community where the family lives. FCAOG CAP Staff or pantry staff (outlying pantries) will inventory diapers. In cases where the pantry staff inventory the diapers, they will report those numbers to the FCAOG CAP staff. The diapers will come from the Utah Diaper Bank and must be separated from other diaper sources at each pantry participating in the Diaper Program. The Utah Diaper Bank will be stored in a separate area in the pantry

from any other potential donated diapers. All paperwork for diapers will be completed to continue receiving diapers from the Utah Diaper Bank.

Eligibility

@/below the 200% of federal poverty level

Parent/guardian of a child in diapers in their home

Intake

Same as CSBG, see intake section of this Policies

If a client has already completed a CSBG application and been eligible for any CSBG service(s) within the last 6 months (self-declaration) or 12 months (submitted proof of income), their eligibility sheet can be provided to the Diaper Program Case Manager so the client can pick-up their diapers. For new clients, ideally, the client will have all intake paperwork completed before picking up their diapers.

The end of intake is to schedule the client to pick up the diapers at the Hurricane Valley Food Pantry. Other accommodations can be provided to the client, upon request.

A federal survey must be provided to the client within seven business days after first diaper pick-up.

AZ baseline matrix must also be completed within seven business days after intake and sporadically throughout the case.

Data collection

FCAOG CAP Staff are required to input client demographics, services, surveys, and outcome data into CAP60 and practice Results Oriented Management and Accountability System (ROMA) for measuring performance and results from that data. All data must be entered within seven business days after the service date. FCAOG CAP Staff will review data quarterly.

Monthly billing and quarterly performance measures will be submitted to Community Action Partnership of Utah. FCAOG CAP Staff will receive CAP60, CSBG Annual Reporting (modules 2 and 4), and ROMA training to ensure data entry complies with program and ROMA requirements.

Record Retention

FCAOG CAP Staff shall maintain accounts, record, documents, and other evidence relating to performance of and reimbursement for FCAOG's services. All pertinent records and books of accounts related to the Agreement shall be retained for a period of three (3) years after the conclusion of the Agreement. Records relating to a litigation or claim arising out of the performance of this Agreement, or performance of the Agreement to which exception has been taken because of audit and /or inspection, shall be retained by FCAOG until such litigation, claim or exception has been resolved.

Termination

FCAOG will not serve families who don't qualify for this funding. The client will be provided a formal email indicating they are no longer eligible for services. Clients qualify for 12 months of services upon a complete intake. If the clients no longer qualify for this funding during that 12 months, the client will not

be served anymore. Clients who don't complete a recertification will not be served past 12 months until recertification is complete.

Also, if a client goes dormant for 120 days (from last date of service), they will have to complete a recertification (income submitted and any updates to household).

Discontinuation Based on Poor Tenant Behavior

Five County Association of Governments will stop all funding and services, as well as any future funding, if it is found that any household member is engaging in the following activity:

1. Not abiding by Participant Rights & Responsibilities
2. Not abiding by pantry rules
3. Not recertifying for continued assistance, past 12 months
4. Using or selling of illegal drugs on the premises

If a client is denied additional Diaper funding due to the above listed infractions, the client may file an appeal to the Director of Community Action within thirty (30) days from receiving notification of debarment.

[see Participant Rights and Responsibilities section]

[see Grievance section]

Due process

In terminating assistance to a program participant, Five County AOG will provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process consists of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; **[see FCAOG application]**
- Written notice to the program participant containing a clear statement of the reasons for termination, which is done through emails.
- 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
- Prompt written notice of the final decision to the program participant.

Recertification

Clients that wish to continue on the diaper grant, after their 12 months of service, will need to recertify for the program. Clients can be served for up to 3 years or until the child(ren) grows out of diapers, contingent upon funding. The client must go through the entire intake process again in order to continue past the 12th month of assistance.

[see CSBG eligibility requirements in INTAKE]

Outcomes

FCAOG will track health and economic outcomes for families. Outcomes being measured:

Goal #1: Build Community-Program Partnerships

Objective 1.1: (Agency) Increase the number of community outreach events provided by each distribution partner from 0 to at least 8 (at least 1 each quarter) April 30, 2025.

Objective 1.2: (Family) Increase the number of unduplicated individuals receiving community referrals via diaper distribution from 0 to 400 by April 30, 2025.

Objective 1.3: (Agency) Distribution partners establish MOUs with at least 3 new community organizations for diaper distribution by September 30, 2024.

Goal #2: Expand UDB's Existing Diaper Distribution Program Capacity

Objective 2.1: (Community) Increase the volume of diapers distributed monthly across five-county area from 0 – 18,000 for unduplicated families.

Objective 2.2: (Family) Increase the frequency of beneficiaries receiving diapers to at least monthly by April 30, 2025.

Objective 2.3: (Agency) support the establishment of a body of evidence to support UDB's demand-driven approach (that can be used with funders and the public) to increase diaper bank donations.

Goal #3: Promote Program Efficiency, Quality & Performance Among Utah DDDRP Partners

Objective 3.1: (Agency) Attend at least 8 training or technical assistance sessions (at least 1 each quarter) from Community Action Partnership of Utah by September 30, 2024.

Objective 3.2: (Agency) Monitoring fiscal and data performance monthly – 24 times total by April 30, 2025.

Goal #4: Expand Coordination of Diaper Distribution Program Logistics

Objective 4.1: (Community) Expand diaper distribution service area from 0 counties to 4 counties (within the five-county area) by April 30, 2025.

Objective 4.2: (Community) 100% of Utah DDDRP distribution sites will be served by a demand-driven diaper bank distribution model which increases the availability of the right-sized diapers for low-income families by April 30, 2025.

Goal #5: Engage in Program Evaluation

Objective 5.1: (Agency) 100% of all Utah DDDRP partners will engage in ACF evaluation activities by January 31, 2023.

Objective 5.2: (Agency) 100% of Utah DDDRP partners will participate in baseline outcome data collection by January 31, 2023.

Objective 5.3: (Agency) Participate in the evaluation of the impact of diaper distribution on families and compare interventions from Head Start (classroom-centered distribution) to community-wide mass-distribution sites by April 30, 2025. This evaluation will be led by from Community Action Partnership of Utah.

1. FNPI 3d: # of individuals who increased their savings.
2. FNPI 3z5: # of individuals who reduced debt.
3. FNPI 5d: # of individuals who improved skills related to the adult role of parents/caregivers.
4. FNPI 5e: # of parents/caretakers who demonstrated increased sensitivity and responsiveness in their interactions with their children (i.e. reduced diaper rash incidents).
5. FNPI 7z1: # of individuals who received bundled services and achieved one or more outcomes.
6. FNPI 3a: of individuals will maintain capacity to meet basic needs for 90 days
7. FNPI 3b: of individuals will maintain capacity to meet basic needs for 180 days
8. FNPI 1a/1b: of unemployed adults will obtain employment.
9. FNPI 3g: of individuals will increase their net worth.

MONITORING

Site Visits will be conducted at least semi-annually, but may be more frequent if deemed necessary. Some, although not all, triggers for additional monitoring may include:

1. SUBGRANTEE does not submit billings timely
2. SUBGRANTEE is identified as having a high-risk through a risk assessment
3. SUBGRANTEE is not meeting the terms and conditions of this subaward
4. SUBGRANTEE experiences drastic staffing changes
5. OCS and/or designated entity requests a site visit

Other Monitoring may include, but is not limited to, technical assistance, desk reviews, expenditure document review, or monitoring by a third party

Affordable Connectivity Program

Five County Association of Governments received funding from Federal Communications Commission, Consumer and Governmental Affairs Bureau to help families and households living with low income who struggle to afford internet service. The goal is to ultimately decrease the cost burden of households in accessing broadband services.

FCAOG Staff are required to either help clients apply in person at the website: getinternet.gov or to refer to website to apply directly.

FCC requires that FCAOG staff use ACP's official logo in all of their publications, posters, websites, and presentations resulting from this award.

For information pertaining to termination and recertification, please visit getinternet.gov.

Data collection

FCAOG Staff are required to track clients and referrals through an excel sheet.

Monthly billing and quarterly performance measures will be submitted to Community Action Partnership of Utah.

Record Retention

FCAOG shall maintain accounts, record, documents, and other evidence relating to performance of and reimbursement for FCAOG's services. All pertinent records and books of accounts related to the Agreement shall be retained for a period of three (3) years after the conclusion of the Agreement.

Outcomes

FCAOG will track the number of individuals that reduced broadband cost burden.

Outcomes being measured: Individuals with low incomes reduced their cost-burden for broadband service.

Outputs (Services and Strategies):

Goal #1: The agency is expected to conduct 6 outreach events during the period of performance.

Outreach activities will include: 7 events in outreach throughout the next 2 years.

Goal #2: The agency will provide education and outreach to 1,560 unduplicated people.

Goal #3: 936 out of 1,560 individuals, or 60%, will decrease their broadband cost burden.

Homeowners Assistance Fund

Five County Association of Governments received funding DWS to help households unable to pay their mortgage because of financial hardships associated with the COVID-19 pandemic. The program may cover mortgage and property charges, taxes, insurance premiums, condominium fees, planned unit development fees, HOA fees, and other assessments that may be required by local or state law. The goal is to reinstate mortgages by curing COVID-19 related mortgage, property tax, insurance, and mortgage associated fee delinquencies and other qualifying expenses to bring homeowners' accounts current. For information relating to termination and recertification, please visit homeownersassistance.utah.gov.

FCAOG will assist households with completing the UHAF program application, market service to the areas we serve, and collaborate with the UHAF program manager regarding the needs of the community.

Data collection

FCAOG Staff are required to track clients and referrals through an excel sheet and/or CAP 60. Monthly billing and quarterly performance measures will be submitted to DWS of the UHAF program marketing, outreach activities, completed applications, customer assistance interactions, including the nature of those interactions such as: phone calls, walk-ins, emails.

Record Retention

FCAOG shall maintain accounts, record, documents, and other evidence relating to performance of and reimbursement for FCAOG's services. All pertinent records and books of accounts related to the Agreement shall be retained for a period of three (3) years after the conclusion of the Agreement.

Outcomes

Outcomes being measured:

Goal #1: FCAOG will assist a minimum of sixty (60) Household Applicant(s) with completing the UHAF program application.

Goal #2: FCAOG will complete at least one outreach activity for each contract year.

Monitoring

FCAOG shall permit DWS the right to monitor the Agreement for compliance. Monitoring may include, but is not limited to, site visits, technical assistance, desk reviews, expenditure document review, or monitoring by a third party.

Court Ordered Community Services

Court Ordered Community Service

Mission:

The mission of our court ordered community service program is to assist individuals towards self-sufficiency by avoiding heavy fine and/or incarceration. This is done by providing the opportunity to community members who are assigned voluntary service hours by the courts to be a volunteer through approved community action and various non-profit organizations within the area.

Process:

Clients who have chosen or have been mandated community service instead of or along with court fees and jail time will need to come in to Five County Community Action or will need to make an appointment with a staff member to be served. General walk-in hours at both St. George and Cedar City are Monday – Thursday 9:00 am to 4:00 pm

Each client will be given an intake application where they will be asked to supply vital information as a volunteer participant. Clients will also sign a volunteer responsibility statement, and an application agreement form which details the rules and expectations of each participant.

After completing the above forms, clients must pay an administrative fee of \$1.00 per assigned hour up to \$50.00 maximum amount if a client declares that he/she cannot pay the fee during sign-up, they will be required to sign an intent to pay form which is an agreement to pay the amount due upon completion and before a completion letter will be drafted for the courts. The client will have seven days to pay the fee if they cannot pay on the day of sign up. After that, an additional \$5.00 fee will be assessed. No more late fees will be added after the \$5.00 late fee.

If a current client is ordered by the same or another court to complete community service within a 30-day period of signing up for community service, then the application and fee will be waived.

If the client declares they are indigent, a Community Service Block Grant application will be filled out and signed by the applicant. Clients must verify household income through the last thirty day pay stubs/bank statement, W2s, SSI/SSDI benefit letters, or previous year tax returns. Clients must have a household income below the 125% federal poverty guidelines to qualify for a fee waiver. For homeless individuals without any income, a declaration of no income must be signed by the client. Upon approval of the waiver the fee will not be collected. The client will then have to set up an appointment with the coordinator to undergo a basic needs assessment. In these instances, the COCS Coordinator will track these clients under the CSBG-clients on the COCS tracking sheet and will be required to follow-up 30, 60, 90, 120, 150, and 180 days (about 6 months) after completion and enter CSBG outcomes for the annual IS Report. CSBG Clients also will be filed in a yellow folder.

After the application is completed and the other forms are filled out to FCCAP satisfaction then a timesheet and list of volunteer stations shall be given to the client. Clients will be informed that this sheet is to be given to the supervisor at the volunteer station to be completed each time they serve.

Note: All court ordered community service should be completed at a non-profit or government

organization. If a client has another volunteer station in mind, which is not listed, they will need to get prior approval from the coordinator before these hours will count toward completion.

When the intake process is completed with the client, all information should be entered in CAP60 and tracked. Client will need to be entered into the Volunteer data base also found in CAP60

Once the hours are completed, the client will present this sheet to FCCAP staff who will then take the necessary steps to verify the hours served by contacting the supervisor who signed off on the hours for the client. If hours can be verified, a completion letter will be drafted to the corresponding court and sent to them as prescribed by each individual court. If the hours cannot be verified, staff should inform the client of this information. If it is suspected the client falsified the information they will be dealt with individually at this point. If deemed falsified by the coordinator and/or director, the client shall be referred back to the courts and they should be informed of how FCCAP came to this conclusion-and that we are no longer willing to work with them as a volunteer participant for this or future cases for a period of time of up to one year.

If the volunteer station/supervisor never gets back to the COCS Coordinator an attempt to compare signatures with previously signed time sheets will be made to validate the signatures.

Terminating Clients from the Program:

Clients are terminated from the program after they complete the court ordered community service hours and pay the processing/application fee. The COCS Coordinator will verify the hours completed by contacting the agency(s) on the time sheet the client provides at the end of his/her service. It will also be verified that the hours were completed in the city or area the court ordered. The file will be checked to see if the client has paid the processing/application fee. If the fee has not been paid, the client will be contacted and notified that to notify the court of completion the fee will need to be paid.

If a client falsifies a time sheet or alters it in any way, that client can be barred from participating in the program for a period of up to one year. At that time their circumstances can be revisited. If a client falsifies time sheets a second time they should be barred from the program.

What Constitutes Community Service:

Non-profit / government entity on the approved list (with MOU). This means organizations with IRS 501(C)3 or units of government. If other tax-exempt agencies are requested, they must serve public goods or provide a service to a larger community; this may sometimes include only specific events or activities.

Special events approved by the COCS Coordinator

Clients may not count hours for friends/families/church groups/or other agencies which do not have MOU).

Clients shall not do work for Non-profit / government entities personnel at their homes or private property as credit for community service – unless pre-authorized to do so.

Exceptions may be counted as pre-approved by COCS coordinator. Requests must be written (emails count). Requests must be in the folder.

Client cannot be paid for the service hours they use to claim court ordered hours. Client may not receive, expect, or ask for any form of compensation, incentive, or reward for performing community service hours.

Reporting Requirements/Hours:

Clients must report their hours every month or risk their case becoming inactive. They can report their hours via email, fax, or an office visit. They must complete 10 hours a month.

One Time sheet will be given to a client at the time the client has signed up. Time sheets will be given to clients one at a time. A client can receive a second time sheet once the first one is filled up and turned in. Time sheets will not be given out to clients outside of walk-in hours. Time sheets cannot be tampered with, or they become null and void.

An altered time sheet may result in the client being terminated from the program.

See above under Process Section for operating hours for sign-up.

Volunteer Policies for COCS Volunteers at Five County AOG

COCS volunteers may not have access to personal information of clients, nor interact with other COCS clients. Volunteers will not handle money or credit/debit card transactions.

Succession Planning:

If our area is declared a natural disaster, we will follow Five County Association of Governments policy concerning this issue as guided by FEMA and the State of Utah.

If the Court Ordered Community Service staff is unavailable due to illness or staff vacancy the case manager or director will assist with sign-ups.

Office Disturbance:

Refer to Safety Policies and Procedures

Policy on Cash and Credit/Debit Handling of Processing/Application Fee:

Only employees of the Five County Community Action Program are allowed to receive cash or credit/debit card payments from court ordered community service clients who are paying their processing/application fee. Volunteers should not receive or handle payments in any form.

If change is needed from the bank a CAP employee should make the transaction after notifying another employee, as a witness, of the amount and intent. When returning with the change a witness should count and observe the money being placed back into the money bag.

A funding memo should be created immediately after receiving cash or conducting a credit/debit card transaction for the processing/application fee.

If it is a cash transaction then one copy goes immediately to Accounts Payable, along with the cash. If Accounts Payable is not on his desk, the money and memo should be placed in the basket of the top left drawer of the Accounts Payable personnel. For debit/credit transactions, the card reader provides a “batch report”. Batch reports, along with receipts and memos, go to the CFO the following day.

Funding memos are part of the client file and should be retained according to the record retention policy.

Credit card payments are acceptable via telephone call.

Record Policy:

When a case is closed as completed it will be placed in the closed case file cabinet.

When a case is closed as incomplete it will be placed in the incomplete case file cabinet.

As stated in the Utah Department of Administrative Services, Division of Archives and Records Service and under UCA 63G-2-304 (2008):

Client Case Files are retained for 5 years and then destroyed.

File folders are as follows:

- A. Manilla – client never received any service or is overqualified but received some service (food pantry only or COCS). For clients that apply for services and do not receive any service for 6 months past application date, their file is to be shredded.
- B. Yellow – CSBG clients that received any service, including COCS Waiver (past intake)
 - Client eligibility screening isn’t a service
- C. Blue – SSBG clients that received any service (past intake)
 - Client eligibility screening isn’t a service
- D. Light blue, accordion file - Continuum of Care
 - These clients are also screened for CSBG services, as part of the grant
- E. Red, accordion file – Unified Funding/ESG/HSG/State Homeless Funding
 - These clients are also screened for CSBG services, as part of the grant
- F. Light Green, accordion file – Temporary Assistance for Needy Families (TANF)
- H. Purple – CARES Act funding (with CSBG)

Grievance and Complaint process:

These will be found in the Five County Association of Governments Community Action Program Policy and Procedures manual.

Non-Discrimination Policy:

This will be found in the Five County Association of Governments Community Action Program Policy and Procedures manual.

Right to refuse service:

This will be found in the Five County Association of Governments Community Action Program Policy and Procedures manual.

Conflict of Interest Policies:

This will be found in the Five County Association of Governments Community Action Program Policy and Procedures manual.

Food Assistance

Pantry Policies and Procedures

[Income eligibility and Reporting](#)

Five County Association of Governments uses a third of its annual CSBG budget for emergency food operations. This is done through subcontracts and through direct operations Hurricane Valley Food Pantry operations. However, without the support of the Utah Food Bank, the donations of community members, and contributions from counties, none of these pantries would have enough food to serve families.

[QEFAF Eligibility](#)

In late 2017, Utah Department of Workforce Services modified some of the rules relating to the Quality Emergency Food Assistance Fund (QEFAF). In the past, the fund served those at 125% poverty guideline or lower (same as the Community Services Block Grant [CSBG]). As part of the FY 18 QEFAF contract, each organization must set forth a policy on what constitutes “low-income”. For the Hurricane Valley Food Pantry, Beaver County Food Network, Garfield County Care and Share, and Kane County Care and Share, this definition will be extended to households at or below the 200% poverty guideline to better coordinate with TANF-assistance through the Utah Department of Workforce Services. Individual exceptions, while rare, may be made for first-time pantry recipients and for other circumstances (medical emergency, change in family structure, immediate loss of job, etc.)

The Five County eligibility only applies to organizations for which Five County is an intermediary of QEFAF funds.

[Eligibility for Food Pantries with multiple eligibility definitions from funders:](#)

There is a different funding eligibility used to serve pantry clients. Five County employees must add clients to the correct CAP60 group and use the appropriate colored files. This is done to ensure that CSBG IS Report data is accurate. The categories are as follows.

- Utah Food Bank / Feed America / Community Donations / County Contributions – No eligibility / refused income (Manilla Folders)

Because of the requirements of Utah Food Bank, clients are not to be turned away on their first visit because of lack of identification, referral, or income verification. If a client falls into this category, the client must be placed into a manila folder.

While clients should receive an emergency food box, they should not be reported as a CSBG client in CAP60 or receive other emergency services (case management, emergency car repair, bus passes, deposit assistance, and other services funding through CSBG) until intake and income verification are complete.

[Move-in Boxes](#)

Move-in boxes do not have a specific program eligibility aside from being eligible for housing assistance in some way or another (rapid re-housing or deposit assistance). This can include other housing programs offered outside of Five County AOG (such as TANF at Switchpoint, Section 8 voucher through a housing authority, etc.).

However, documentation of program participation is required.

Move-in Boxes are also only provided one time for each new unit moved into. If additional food boxes are needed, Five County staff should refer to community pantries. If additional non-food items are needed outside of the move-in box, Five County staff may issue DI Vouchers.

Service Animals and ADA Compliance

The food pantry will have designated animal accompaniment hours during which clients may bring ADA certified service animal into pantry for services. If clients are not able to come during set hours, arrangements will be made to accommodate them.

Pantry Safety Protocol

In order to best ensure the safety of staff, volunteers and clients, paid staff and volunteer staff are not to be alone during pantry business hours. If no more than 1 staff member is available/present at the time of opening hours, the pantry will remain closed and resume regular business hours the following pantry business day.

Volunteer Compensation at Food Pantries

All active pantry volunteers (including COCS volunteers) must abide by **COCS policies (see pg. 125)** regarding compensation while performing volunteer service hours.

Emergency Food Assistance

The Emergency Food Assistance (EFA) grant is a special fund for qualified emergency food agencies in Utah. EFA funds must be expended by qualified agencies only for purposes related to 1- Warehousing food and food Ingredients, 2- Distributing food and food Ingredients to other agencies and organizations providing food and food Ingredients to low-income persons, 3- Providing food and food Ingredients directly to low-income persons.

Five County CAP subcontracts most of this funding to the outlying pantries to help low-income households who are experiencing food insecurity in Garfield, Kane, & Beaver counties.

Pantries must apply each year for EFA and then are reimbursed for their expenses throughout the funding period after approval. Pantries must verify eligibility, provide service in a safe and fair manner, and maintain permits, licenses, and designations. Pantries should submit reimbursements to FCAOG CAP at least quarterly and at most monthly.

Pantries are required to input pantry data into CAP60 and practice Results Oriented Management and Accountability System (ROMA) for measuring performance and results from that data. Five County CAP will provide adequate training to the pantries in assisting with data entry into CAP60 and ROMA training and assistance in complying with ROMA.

Client files and other records at each pantry will comply with record retention requirements through the Utah State Community Services Office with the Department of Workforce Services. Five County CAP will monitor each pantry annually. The pantries will provide all food services at no cost to the household.

Pantries will provide food and referrals to other low-income program that could help their clients. If a client is in need of help to apply for other programs, Five County CAP Case Manager may assist with that.

Emergency Food and Shelter Program (EFSP)

Five County Association of Governments – Community Action Partnership serves as the fiscal conduit for the Emergency Food and Shelter Program funds, which comes through the EFSP National Board (United Way and FEMA). As such, community agencies that provide emergency food and/or shelter within the five counties (Beaver, Garfield, Iron, Kane, and Washington) can apply for EFSP funds each phase.

The EFSP national board releases a manual for local boards and local recipient organizations to abide by. The manual can be accessed at www.efsp.unitedway.org. A log-in and password are required to access this information. The most recent addendum to the program manual can also be accessed online.

The Emergency Food and Shelter Program is administered by a local board made up of representatives from the community.

(For details see the Emergency Food and Shelter Program manual and the most recent addendum online at www.efsp.unitedway.org).

The EFSP local board uses Roberts Rules of Order during board meetings.

Succession Planning

Succession Plan

Permanent Position Replacement

In the event of a permanent replacement due to resignation, termination of jobs, or department/agency restructuring, or death, the Five County Community Action Department will follow the procedure as outlined in the Five County employee handbook as approved by the Steering Committee in accordance with CSBG Organizational Standard 4.5.

However, while employed within the Community Action Department, all employees will follow specific department procedures which will aid the successful transition of employees. These department-specific guidelines fall under the Human Services Council to approve, with final approval granted from the Five County Steering Committee.

Intellectual Property, Client-related files, and financial records

All Community Action staff will save their work to the CAP file folder on Five County secure server. Access will only be given to authorized individuals. This server is backed up in several different locations across the country in the event of a natural disaster, long-term power-failure, or damage to computers and servers within Five County AOG locations.

All documents should be current (no more than 30 days from file creation/modification). This is especially important in programs dealing with volunteer schedules, client assistance files (including on-going check requests), and financial documents (like reimbursement requests, department budgets, board documents, etc.)

Staff should not copy files from the server and work off of their own local devices.

Important files within the Five County CAP folder:

Department Information: Logos, Grant Identification Information, Community Foundation Information (501(c)3), department-wide donations and donation letters, partnership letters for community partners (like VOCA letter of support for Canyon Creek Women's Crisis Center or Talent Ready Utah grant for Tech2Empower which do not fall under a specific program).

CSBG: Program Expenses, subaward information (including applications, data reporting, contracts, monitoring, and billing reimbursements), data and annual report (IS Report previously) information, etc. This is a folder to save important CSBG documents from funders and board members.

Newer CSBG files will also contain case notes, baseline assessments, and check memo / "funding memo" requests for direct assistance. **Note: some of these files may be short-cuts to other program files, such as a Continuum of Care client receiving CSBG services as match.**

SSBG: Similar to CSBG but contains pre- and post-award expenditure forms directly relating to SSBG.

EFSP (Emergency Food and Shelter Program): Contains each "phase" of the awards for the region (1 for Iron County and 1 for the other 4 counties). Will also have EFSP board information (separate from Human Services Council and Steering Committee) in addition to board plan, check requests, non-profit applications, and annual reporting to the National EFSP Board.

COCS: Forms for the Court-Ordered Community Service program, in addition to agency referral list, receipt of income memos, project income tracking, and the customized COCS Access Database developed in-house.

Rapid Re-housing: Client files for Utah Unified Funding (Pamela Atkinson Homeless Trust Fund) and Continuum of Care. This will have some project income, reporting, trainings on rapid re-housing, and other information relating to several different rapid re-housing grants.

Billings and Budgets: Program budgets (including revisions) reimbursement billings for each grant.

Community Needs Assessment: The CNA as well as documents related to the strategic plan, community action plan, data, etc.

Five County Work Email

Staff should not utilize personal email while representing Five County AOG. This will enable work-related emails to be forwarded after the departure of specific employees.

For generic applications and COCS check-ins, please encourage clients to use the capuser@fivecounty.utah.gov email so it can be forwarded easily to replacement staff.

Staff should not use work email for personal use.

Individual Program Succession

Individual Succession Plan

Each Community Action staff member will have a succession plan in place, with the Director having knowledge of these plans. These plans will be modified as job descriptions change, as staff transition away from employment, at the request of the employee or director, or during annual employee performance reviews.

The current CSBG Case Managers are April Merrill and Shane Wagers. The back up for April Merrill will be Guesrie Mardy and Shane Wagers. The back up for Shane Wagers will be April Merrill.

The COC and ESG Case Managers are Toni Tuipulotu and Shane Wagers, who will be backups for each other.

The TANF Case Managers are Niki Jamer, Shane Wagers, and April Merrill. They will all serve as fallbacks for each other.

The current staff members that run the Hurricane Valley Food Pantry are Jodi Wilcox and Susan Mangum. They will serve as fallbacks for each other.

Department Financials

The CFO of Five County AOG will have access to Eloccs, Web grants, and any other reimbursement software needed to file reimbursements. Monthly financial reports (including time allocations) will be saved on the CAP network.

Case managers should also keep copies of financial assistance in client files and on the network.

Department Social Media and Communication Accounts

For Facebook, a minimum of at least two administrative users within the department is required. After an employee with access to managing the page leaves, they should be removed within several days.

For Facebook and WordPress – account information is securely locked in the program director's room.

Case Management Staffing

In the event the program director is unable to staff cases as a result of an emergency or conflicting appointment, the following succession steps may be taken:

- 1) Staff with Deputy Direct of the AOG who oversees programs.
- 2) With prior approval of director, staff the case with another Community Action employee (with case management experience). It may still be a good idea to check with CFO to ensure sufficient funds are available

HR

The HR specialist will maintain copies of all HR related paperwork. Extras will be in the program director's office.

Appendix

