Homelessness Solutions Program (HSP) Policy Guide

Effective July 1, 2018

Maryland Department of Housing and Community Development (DHCD)
Office of Community Services Programs
Division of Neighborhood Revitalization
As of 7/1/18
Effective July 1, 2018, the Emergency Solutions Grant (ESG), Rental Allowance Program (RAP), Emergency and Transitional Housing and Services (ETHS), Homeless Women’s Crisis Shelter Homes, Service-Linked Housing, and the Housing Navigator and Aftercare Program were consolidated in order to create one streamlined source of funding known as the Homelessness Solutions Program (HSP). The Maryland Department of Housing and Community Development, Division of Neighborhood Revitalization (the Department), administers HSP with the following program goals:

- Provide shelter as a crisis response for people experiencing homelessness;
- Reduce the number of individuals/households who become homeless;
- Shorten the length of time an individual or household is homeless;
- Reduce the number of individuals/households that return to homelessness; and
- Provide fixed or short-term rental assistance payments to people at risk of being homeless.

Furthermore, HSP serves as a statewide funding response to address the issue of homelessness, aligning Maryland efforts with federal priorities to make homelessness “rare, brief, and non-recurring.” To better assist in this effort, this policy guide was created to provide additional guidance to grantees and subgrantees, regarding eligible program activities, proper client determination, and effective program monitoring and management.

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# Table of Contents

I. Definitions .......................................................................................................................... 4

II. Criteria for all HSP Grantees ........................................................................................... 6

III. HSP Program Compliance Requirements ......................................................................... 8

IV. Criminal Background Restrictions for Shelter Admission .................................................. 9

V. Implementing a Housing First Approach .......................................................................... 10

VI. Coordinated Entry ........................................................................................................... 11

VII. HSP Client Eligibility ..................................................................................................... 12

VIII. HSP Allowable Activities ............................................................................................... 13

A. HSP Allowable Activities – Outreach ............................................................................. 13

B. HSP Allowable Activities – Emergency Shelter ............................................................... 15

C. HSP Allowable Activities – Housing Stabilization Services ............................................ 18

D. HSP Allowable Activities – Homeless Management Information System ....................... 22

IX. Statewide Data Collection: MDHSW Participation .......................................................... 24

X. HSP Program Recordkeeping Requirements ..................................................................... 25

XI. Grievance and Termination Procedure .......................................................................... 27

XII. Administrative Funds ..................................................................................................... 29

XIII. Monthly Invoicing Requests ......................................................................................... 30

XIV. Matching Requirements ................................................................................................. 31

XV. Monitoring and Compliance Requirements ..................................................................... 32

XVI. Appendices ..................................................................................................................... 35

Appendix 1: HSP Program Components Quick Reference Guide
Appendix 2: Common Eligibility Criteria for Emergency Shelters
Appendix 3: HSP Minimum Habitability Standards for Emergency Shelter Checklist
Appendix 4: The Core Components of Rapid Re-Housing
Appendix 5: HSP Minimum Habitability Standards for Permanent Housing Checklist
Appendix 6: HSP Lead-Based Paint Screening Worksheet
Appendix 7: HSP Accounting Transaction Report Sample
I. Definitions

"At risk of homelessness" means a household with an annual income below 30% of the area median income (AMI) and does not have sufficient resources or support networks immediately available to prevent them from becoming homeless.

"Client" means a recipient of services.

"Continuum of Care" (CoC) means the regional or local planning body that coordinates housing and services funding for homeless families and individuals as defined in 24 CFR 578.3.

"Crisis shelter home" means an emergency shelter that provides assistance in moving households from homelessness into permanent housing and provides shelter, meals, information and referral services, and counseling to households.

"Department" means the Department of Housing and Community Development, a principal department of the State.

"Dwelling unit" means a room, an apartment, house, or mobile home.

"Eligible dwelling unit" means a dwelling unit that:
   (a) Is subject to a physical inspection under a federal, another State, or a local affordable housing program, including the federal low-income housing tax credit program; or
   (b) Meets the dwelling unit standards established by the Secretary in accordance with Housing and Community Development Article, §4-1403, Annotated Code of Maryland as well as the Minimum Habitability Standards as defined in 24 CFR 576.403.

"Family shelter" means any shelter that serves children under the age of 18.

"Grant" means the funds awarded by the Department to a grantee from available program funds.

"Grant application" means an application for grant funds from the Department.

"Grantee" means a nonprofit entity or local government that receives a grant from the Department under a program.

"Homeless" means a household who lacks a fixed, regular, and adequate nighttime residence.

"Homelessness Solutions Program" a Department program that provides federal and state funding to local CoCs to support homeless and at risk of homelessness services across the state of MD.

"Household" means an individual or one or more adults and/or children living together as a family.
"Housing assistance payments" means rental assistance payments that are used, for a period not to exceed 24 months, to pay:

(a) Rent;
(b) Security deposits;
(c) Utilities; and
(d) Housing-related expenses.

"Local government" means any of the 23 counties of the State, the City of Baltimore, a municipal corporation of the State subject to the provisions of the State Constitution, Article XI-E, or any of their duly authorized agencies, departments or instrumentalities.

"Nonprofit organization" means a corporation, foundation, or other legal entity that is exempt from federal income tax under §501(c)(3) of the Internal Revenue Code.

"Program" means any of the Homelessness Solutions Programs.

"Program agreement" means an agreement or agreements between the Department and a grantee to implement one or more programs.

"Provider" means an entity that:
(a) Is a nonprofit entity, a local government, or a public housing authority; and
(b) Contracts with the Department or a grantee to provide services under a program.

"Resident of the State" means a person who is living in the State voluntarily and not for temporary purposes, with no immediate intention of moving from the State at the time of application.

"Secretary" means the Secretary of the Department.

"Subgrantee" means entities under contract with the Grantee (CoC) to provide HSP direct client services and receive funding directly from the grantee agency.

"Special populations" means unaccompanied homeless youth, veterans, participants of victim service programs, and services for people living with HIV/AIDS. Victim services include spousal violence, dating violence, sexual assault, human trafficking or stalking.
II. Criteria for all HSP Grantees

Funding for HSP is available to eligible Continuums of Care (CoCs) within the State of Maryland. CoC grantees and subgrantees must comply with program guidelines outlined in this policy guide as well as applicable state and federal regulations.

All grant recipients of HSP must meet the following criteria:

1. **Be a nonprofit entity, or a local government entity.**

2. Administer homeless services from a **client-centered approach**. A client-centered approach means case management administered by a program focuses on specific needs of program participants (clients) and tailors case management assistance accordingly. Client-centered services also follow the best practices of Housing First principles referenced in this guide.

3. **Comply with Federal and state non-discrimination policies:** This includes all applicable federal requirements pertaining to non-discrimination, equal opportunity, and fair housing as discussed within this policy guide.

4. **Provide equal access to shelter.** Grantees and subgrantees must serve all households regardless of the sex, sexual orientation, gender identity, or age of any members of the family. Family shelters that only allow **households headed by one gender and not another (e.g. women and children and not men and children) are not eligible to receive funding through HSP.** HUD has determined that any shelter which accepts children is considered a “family” shelter, and therefore must accept all family compositions, regardless of the sex, sexual orientation, gender identity, or age of any members of the family.\(^1\) Also in accordance with COMAR, Title 05, Subtitle 21 shelters are prohibited from involuntarily separating families. The age of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses HSP funding.

5. **Have a formalized grievance procedure:** Grantees and subgrantees shall maintain written grievance procedures for termination and denial of benefits based on the regulatory information provided in this guide.

6. **Function with sound financial program management,** including being in accordance with federal OMB Uniform Guidance and Generally Accepted Accounting Principles (GAAP). This also includes **maintaining accurate** accounting and record keeping systems that control and identify contract funds, track all expenditures, and generate statistical reports.

7. **Maintain all books, client records, and financial documents** in a secure, locked location and ensure that records are kept for at least **five (5) years after the close of the grant.** Grantees and/or subgrantees must keep copies of back-up documentation to verify

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\(^1\) [https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/](https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/)
expenses covered by HSP grants. All expenses must meet the allowable use of funds outlined in this guide.

8. **Use a Homelessness Management Information System (HMIS)** (or a comparable database for domestic violence providers) to enter and track data and share it with the **Maryland State Homelessness Data Warehouse (MSHDW)** on a quarterly basis.

9. Grantees must have and maintain **HSP policies and protocols** to guide the work of subgrantees to meet the requirements outlined in this guide.

10. Grantees and subgrantees must participate regularly in **Continuum of Care (CoC) meetings** and activities. In addition to satisfying the aforementioned requirements, CoC Lead Agencies have the responsibility of overseeing HSP subgrantees in order to verify proper execution of HSP-eligible services to households experiencing homelessness. **Failure to do so can result in a decrease or loss in HSP funding.**
III. HSP Program Compliance Requirements

All HSP grantees and subgrantees are required to comply with federal, state, and local laws as well as Department policies regarding discrimination and equal opportunity in emergency shelter and housing. This includes:

1. **Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)** prohibits discrimination in the sale, rental, financing, and use of dwelling units based on race, color, national origin, religion, sex, familial status or disability. Title VIII also prohibits the discrimination of clients accessing shelter, as it is considered a dwelling unit under the 1988 amendment of the act.

2. **The Americans with Disabilities Act of 1990** prohibits discrimination of a person with a disability from participating in programs or activities. If a client seeking services has expressed that they have a disability, providers are required to make reasonable accommodations in policies and practices as well as reasonable modifications in physical structures.

3. **The 2012 Equal Access to Housing Final Rule** prohibits the discrimination of clients with regard to actual or perceived sexual orientation, gender identity or marital status. Furthermore, the Equal Access to Housing Final Rule clarifies the term “family” to mean that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or marital status, are considered to be a family and must be served together as such.

4. **2016 HUD Equal Access in Accordance with Gender Identity Final Rule to Housing Final Rule (Gender Identity Rule)** prohibits providers from requiring involuntary client disclosure of sexual orientation or gender identity for the purpose of program eligibility or admission. The Gender Identity Rule ensures that all clients, including transgender and other individuals who do not identify with the sex they were assigned at birth, are provided with fair access to programs, benefits, and services.

5. **Prohibition of Mandatory, Faith-Based Activities** disallows grantees or subgrantees receiving HSP funds to require participation of any kind in religious activities as a condition to receiving shelter services. Furthermore, shelter programs should not infringe upon a client’s personal religious practices.

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2 [https://www.hud.gov/program_offices/fair_housing_equal_opp/progdesc/title8](https://www.hud.gov/program_offices/fair_housing_equal_opp/progdesc/title8)

3 [https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:1.2.1.1.1&idno=24#se24.1.100_120](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:1.2.1.1.1&idno=24#se24.1.100_120)

4 [https://www.dol.gov/oasam/regs/statutes/ada_iia.htm](https://www.dol.gov/oasam/regs/statutes/ada_iia.htm)

5 [https://www.hudexchange.info/faq/1529/how-is-the-definition-of-family-that-was-included/](https://www.hudexchange.info/faq/1529/how-is-the-definition-of-family-that-was-included/)


7 [https://www.hud.gov/LGBT_resources](https://www.hud.gov/LGBT_resources)
IV. Criminal Background Restrictions for Shelter Admission

On April 4, 2016 the Office of General Counsel within the US Department of Housing and Urban Development (HUD) issued guidance entitled, “Application of Fair Housing Act Standards to the Use of Criminal Records by Housing Providers and Real Estate-Related Transactions.”

That guidance can be found here:

https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHAStandCR.PDF

The Department encourages providers to fully review the HUD guidance. The Department requires that all policies related to criminal background checks and restrictions to access to shelter must be reviewed and approved by the Lead CoC Agency.
V. Implementing a Housing First Approach

The Importance of Implementing a Housing First Approach

The Housing First approach focuses on quickly connecting people experiencing homelessness to permanent housing without preconditions and barriers to entry (e.g., sobriety treatment or service participation requirements). Services are voluntary and research has proven that once placed into housing, people experience improvements in their quality of life in the areas of health, mental health, substance use, and employment. This approach emphasizes the belief that housing is the foundation for quality of life improvements and acknowledges the basic principle that everyone is ready for housing regardless of their complex needs. This concept applies to shelters, transitional housing and permanent housing.

Housing First emerged as an alternative approach to traditional, treatment-based programs. In many programs, people experiencing homelessness were offered housing options only after they could demonstrate that they were “ready” for housing. In contrast to this belief, according to the United States Interagency Council on Homelessness (USICH) and Housing and Urban Development (HUD), Housing First is based on the following principles:

- Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
- Everyone experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time, while others may need more intensive and long-term supports.
- Everyone is “housing ready.” Sobriety, compliance in treatment, or even criminal histories does not necessarily determine success in housing. However, homelessness programs and providers must be “consumer ready.”
- People experiencing homelessness have the right to self-determination in housing and should be treated with dignity and respect.
- The design of housing and services depends upon the needs and preferences of the population.

To successfully address homelessness in Maryland, the Department has adopted this evidence-based model. Grantees and subgrantees that receive HSP funding are required to follow the best practices of Housing First principles for effective service delivery.

Low-Barrier Shelter

In addition to Housing First Best practices, shelters that receive HSP assistance must implement a “low barrier” practice into the shelter operation. Low-Barrier Shelters help to provide immediate and easier access to shelters by eliminating sobriety, income requirements or other polices that could make it difficult to enter a shelter. To evaluate shelter standards, please review Appendix 2: Common Eligibility Criteria for Emergency Shelters created by the 100,000 Homes Campaign.

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8 https://www.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf
VI. Coordinated Entry

As a requirement of HUD, CoCs must have a Coordinated Entry System (CES) established. According to CoC regulations 24 CFR 578.7(a)(8), HUD’s primary goal for CES is to assist with identifying people experiencing homelessness, to prevent homelessness whenever possible, and to assess the needs of people experiencing homelessness quickly in order to connect them to housing and services.9

**Core elements of a CES as defined by HUD include:**

- CoCs must establish **access points** for people experiencing homelessness to receive intake to homeless services. The Continuum of Care (CoC) must ensure the system is accessible throughout its geographic area. For larger areas, multiple points of access are allowable, as long as the intake process is the same.

- Create an **assessment process** to gather information on people’s needs, preferences, and the barriers they face in regaining housing. The assessment process should be a process consistent throughout the CoC in order for clients to achieve fair, equitable, and equal access to services within the community. Assessments should be based on Housing First principles allowing clients to decide the information they will share and the services seek. CoCs must establish written policies and procedures concerning protection for clients of all data collected through the CES assessment process.

- CoCs use the CES to **prioritize** people experiencing homelessness within the CoC’s geographic area. CoC’s written policies and procedures include detailed information about the factors and assessment information that illustrates how prioritization decisions are made.

- **Referrals** to housing or services may occur at various points in the CES, depending on how CoCs choose to incorporate it. How and when referrals occur depend on many factors, such as the person’s needs and preferences, local priorities, and available resources.10

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VII. HSP Client Eligibility

Grantees and subgrantees receiving HSP funding must ensure that clients are eligible to receive HSP-funded services. **HSP requires that clients obtaining services must be:**

1. **Homeless or,**
2. **At Risk of Homelessness with an annual income below 30% of area median income.**

1. **Homeless**

A homeless household is one that **lacks a fixed, regular, and adequate nighttime residence.**

Examples of clients that are homeless include:

- Households staying in a public or private place not meant for human habitation (such as wooded areas, cardboard boxes, sidewalks, underpasses, public bathrooms, etc.).
- Households staying in emergency shelters, transitional housing, or motels paid for by a service provider.
- Households fleeing from domestic violence.
- Households exiting an institution for 90 days or less and staying in a shelter or place not meant for human habitation prior to institution stay.

**Clients meeting the “homeless definition” are eligible for Outreach, Emergency Shelter, and Rapid Re-Housing assistance.**

2. **At Risk of Homelessness**

To be considered at risk of homelessness, **a household must not have sufficient resources or support networks immediately available to prevent them from becoming homeless AND have an annual income below 30% of the area median income.** Examples of clients who are at risk of homelessness include:

- Households that have moved because of lack of economic resources two (2) or more times within 60 days of requesting assistance.
- Households living in the home of another because of economic hardship and have been asked to leave.
- Households that have been notified that their right to occupy their leased housing will be terminated within 21 days after applying for assistance (an eviction notice).
- Households living in a motel or hotel that they are paying for.

**Clients meeting the “at risk of homelessness” definition are eligible for Homelessness Prevention assistance only.**
HSP consolidates six state and federal funding sources to provide one consolidated source of funding for local CoCs. These funding sources are intended to provide immediate and flexible responses to homelessness. Mirrored by federal HUD program priority areas, HSP provides funding for four main activities: Outreach, Emergency Shelter, Housing Stabilization Services, and Homeless Management Information Systems (HMIS). The following section serves as guide for these activities to ensure proper program implementation.

A. HSP Allowable Activities – Outreach

HSP Outreach funds may be used for activities to reach unsheltered households experiencing homelessness to connect them with emergency shelter, housing, and other critical services. Additionally, HSP Outreach funding may be used for special events as described below.

HSP Outreach funding may be used for the following activities:

- **Engagement** – Tools and activities for the purpose of locating, identifying, and building relationships with households experiencing homelessness in order to engage them in immediate support and connection them with social services and housing programs. These tools and activities may include:
  - Making an initial assessment of needs and eligibility;
  - Cell phones for outreach workers;
  - Providing meals, blankets, clothes, or toiletries to clients; and
  - Providing information and referrals to emergency shelter, permanent supportive housing, and rapid re-housing programs.

- **Case management** – Staff salaries associated with assessing housing and service needs, and monitoring the delivery of outreach services to meet the needs of the program participant.

- **Transportation** – Costs of travel by outreach service providers, social workers or medical professionals are allowed for the purpose of administering outreach services. The costs of transporting unsheltered households to emergency shelters or other service facilities such as hospitals or urgent care are also eligible.

Additional transportation costs may include:

- The cost of a program participant’s travel on public transportation;
- Mileage allowance (if outreach service providers use their own vehicles to visit program participants);
- The cost of purchasing or leasing a vehicle for the organization’s staff to transport program participants, as well as general expenses such as gas, insurance, taxes, and maintenance for the vehicle.
• **Special Events** – The outreach component of the HSP grant may also cover special events such as **Homeless Resource Days (HRD)** and activities designed to support the annual **Point-in-Time (PIT) Count**.

  a. **Homeless Resource Day (HRD)** – Fairs to inform homeless individuals, families, and their communities about the spectrum of housing, shelter and support services available in their area. These eligible activities may include direct services such as dental care, food, clothing, and other necessities for households experiencing homelessness. HSP Outreach funding for this event may also cover costs associated with event planning/coordination, toiletries, and promotional items.

  b. **Point-in-Time (PIT) count** – The Point-in-Time (PIT) count is a count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that Continuums of Care conduct an annual count of persons experiencing homelessness who are staying in emergency shelters and transitional housing on a single night. Continuums of Care also must conduct a count of unsheltered homeless persons every other year (odd numbered years). Each count is planned, coordinated, and carried out locally. HSP Outreach funding for this event may include training and survey materials or incentives such as gift cards, blankets, toiletries, and other necessities.

**Unallowable Uses of HSP Outreach Funding:**
HSP funds may not be used for ineligible activities such as:

• Personal staff furniture, personal food expenses, or transportation costs.

*Grantees unsure about HSP Outreach expenses should consult with the Department prior to administering HSP Outreach funding.*
B. HSP Allowable Activities – Emergency Shelter

According to 24 CFR 576.2, emergency shelter means any facility that has the primary purpose of providing a temporary shelter for individuals and families experiencing homelessness. Emergency shelters do not require occupants to sign leases or occupancy agreements. HSP Emergency Shelter funding covers activities that connect people to single sex shelters and/or family shelters. Additionally, any emergency shelter that receives HSP assistance for shelter operations must meet the minimum safety and sanitation standards promulgated by HUD. To ensure clients are receiving adequate assistance through emergency shelter operations, HUD has created a list of minimum standards for grantee and subgrantee inspection. To document compliance for this requirement, HSP Grantees must complete Appendix 3: HSP Minimum Habitability Standards for Emergency Shelter Checklist during HSP Monitoring.

HSP Emergency Shelter funding may be used for the following activities:

- **Shelter Operations** – Funds may be used to provide services to families and individuals experiencing homelessness in emergency shelters as well as general building operations. Eligible costs include:
  - Rent/mortgage of the facility;
  - Maintenance for minor or routine repair of shelter facilities;
  - Security, equipment, insurance, utilities (such as gas, water, electricity, fuel, etc.);
  - Food and/or food service delivery;
  - Furniture and general shelter supplies; and
  - Hotel or motel vouchers, where no emergency shelter is available for households experiencing homelessness.

- **Case management** – Staff salaries for those directly providing services to clients.

- **Child care** – Onsite child care costs may include providing meals and snacks, and appropriate developmental activities for children while in shelter. The children in child care must be under the age of 13, unless they have a disability. Children with disabilities must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

- **Outpatient health services** – Eligible activities may include outpatient health services and outpatient treatment of medical conditions, provided by licensed medical professionals. **Please note: HSP funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the community.**

- **Mental health services** – Eligible mental health activities may include treatment of crisis interventions and therapy sessions. **Please note: HSP funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the community.**
• **Substance use treatment services** – Eligible substance use treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance use or addictive behaviors. Please note: HSP funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the community.

• **Legal services** – Hourly fees for legal advice and representation by attorneys licensed in good standing with the bar association about matters that hinder households from obtaining housing. This can include matters such as:
  - Child support, guardianship, paternity, emancipation, and legal separation;
  - Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; and
  - Appeals of veterans and public benefit claim denials are eligible costs under emergency shelter.

• **Education services** – When necessary for the program participant to obtain housing, education services activities may include instruction or training in consumer education, health education, substance use prevention, literacy, English as a Second Language, and General Educational Development (GED).

• **Employment assistance and job training** – Employment assistance and job training programs within the emergency shelter may include classroom, online, and/or computer instruction, on-the-job instruction, and services that assist individuals in securing employment.

• **Life skills training** – Activities may include teaching critical life management skills necessary to assist the program participant to function independently in the community. Activities may include:
  - Budgeting and managing money resources, conflict resolution, shopping for food and needed items, improving nutrition, learning how to use public transportation, and parenting while in the shelter.

• **Transportation** – transportation costs of a program participant’s travel to and from medical care, employment, child care, or other eligible essential services facilities. Additional transportation costs can include:
  - The cost of a program participant’s travel on public transportation;
  - Mileage Allowance (if service providers use their own vehicles to visit program participants);
  - The cost of purchasing or leasing a vehicle for the organization’s staff to transport program participants, as well as general expenses such as gas, insurance, taxes, and maintenance for the vehicle.

• **Transitional Housing** – Transitional housing is designed to meet more intensive service needs to increase the housing stability of the population served. Stays are typically between 90 days and 2 years and may require occupants to sign leases. Providers should link program participants to income sources, with the goal of helping participants secure permanent housing.
Please note: Transitional Housing is an eligible expense under this category, but should be used primarily for special populations such as persons experiencing domestic violence and unaccompanied homeless youth. HUD has emphasized that transitional housing is a more costly homelessness intervention; therefore, its use should be specifically for special populations in need of longer term services. Using HSP for Transitional Housing costs must be pre-approved by the Department.

Unallowable Uses of HSP Emergency Shelter Funding
HSP funds may not be used for ineligible activities such as:

- Capital Costs – HSP funds may not be used for major building rehabilitation, renovations or construction labor;
- Personal staff furniture, personal food expenses, or transportation costs; or
- Inpatient detoxification and other inpatient drug or alcohol treatment.

Please note: Program participants may have a cooperative responsibility for housekeeping duties in shelter. Housekeeping duties shall be limited to the immediate area where the client sleeps and additional housekeeping duties shall be voluntary. Failure to complete additional voluntary duties is not a valid reason for program termination.

Additionally, charging client fees of any kind is not allowed in emergency shelter. This also includes collecting public benefits assistance such as Supplemental Nutrition Assistance Program (SNAP) or food stamps as income towards program fees from shelter occupants.

*Grantees unsure about HSP Emergency Shelter expenses should consult with the Department prior to administering HSP Emergency Shelter funding.

C. HSP Allowable Activities – Housing Stabilization Services

Housing Stabilization Services are designed to help individuals below 30% of Area Median Income (AMI) find, pay, and remain in permanent housing. Eligible costs include Rapid Re-Housing rental assistance, financial assistance, and case management. Rapid Re-Housing and Homeless Prevention Assistance have different client eligibility requirements, but rental assistance and financial assistance both have the same eligible activities for each program. The Department prioritizes Rapid Re-Housing as an intervention that focuses on those most in need of services, but recognizes that homelessness prevention is also an important strategy for addressing homelessness.

1. Rapid Re-Housing (RRH)
Rapid Re-Housing “rapidly” connects households experiencing homelessness to permanent housing through financial assistance and housing-focused services. RRH programs help families and individuals living on the streets or in emergency shelters to obtain permanent housing.

- All eligibility, types, and amounts of assistance for RRH must be re-evaluated annually and assistance is not to exceed 24 months. For best practices of how to successfully implement RRH principles, please see Appendix 3: The Core Components of Rapid Re-Housing.

- Additionally, subgrantees working with individuals and families transitioning into housing should incorporate Appendix 5: Minimum Habitation Standards for Permanent Housing Checklist and Appendix 6: HSP Lead-Based Paint Screening Worksheet into their housing assessment to review safe and sanitary housing conditions. Please note: to execute a minimum habitability review, subgrantees do not need to hire a licensed housing inspector. Minimum standards for housing inspections may be facilitated by a subgrantee staff person.

2. Homelessness Prevention Assistance
Homelessness Prevention assistance is for households at risk of homelessness. Homelessness prevention assistance is intended to provide housing stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation. Households must have an income level below 30% AMI and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving into an emergency shelter. According to the Department, it is best practice for the subgrantee to first try to negotiate with landlords as the first step in resolving the eviction crises. If an agreement with the client and landlord cannot be made for the client to stay in the permanent housing, the subgrantee may then pay for financial assistance for the client to move into new, permanent housing.

- All eligibility, types, and amounts of assistance for homeless prevention must be re-evaluated every three months. Overall assistance is not to exceed 24 months.

- Additionally, subgrantees working with individuals and families transitioning into new housing after an eviction or paying assistance for current housing should incorporate Appendix 5: Minimum Habitability Standards for Permanent Housing Checklist and Appendix 6: HSP Lead-Based Paint Screening Worksheet into their housing assessment.
To ensure clients are living in adequate and safe permanent housing, HUD has created a list of minimum standards for grantee and subgrantee inspections. Please note: to execute a minimum habitability review for homelessness prevention funds, subgrantees do not need to hire a licensed housing inspector. Minimum standards for housing inspections may be facilitated by a subgrantee staff person.

HSP Housing Stabilization Service funding may be used towards the following activities:

- **Rental assistance costs** – HSP funds may be used to pay a portion or all of a client’s rental assistance for up to 24 months during any three-year period. The time frame for this assistance includes:
  - Short-term rental assistance (0-3 months),
  - Medium-term rental assistance (4-24 months),
  - Rental Arrears (one-time payment for up to 6 months of rent in arrears).

Any combination of the above types of assistance is acceptable as long as the total amount of assistance does not exceed 24 months.

- **Financial assistance costs** – HSP funds may be used to pay housing owners/landlords, and utility companies for the following costs:
  - Rental application fees;
  - Security deposits (no more than the amount of two (2) month’s rent);
  - Last month’s rent (this assistance must not exceed one month's rent);
  - Utility bill payments (no more than 24 months assistance and up to six (6) months of arrears per utility service); and
  - Moving costs (eg. truck rental or moving company fees, or up to three months of storage assistance).

Please note: All financial assistance administered counts towards the 24 month time limit clients are allowed to receive Housing Stabilization Services.

- **Services costs**– HSP funds may be used to pay the costs of providing the following services:
  - Housing search and placement – services or activities necessary to assist program participants in locating, obtaining, and retaining permanent housing;
  - Housing stability case management – assessing, coordinating, and monitoring the delivery of services for program participants to obtain or maintain permanent housing;
  - Mediation – mediation services between the clients and the owner or person(s) with whom the client is living. Mediation services are eligible only under the assumption that clients may lose housing if services are not rendered;
  - Legal services – legal services related to landlord/tenant matters, and the services necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing;
  - Credit repair – credit counseling and other services necessary to assist clients with
critical skills related to household budgeting, managing money, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Unallowable Uses of HSP Housing Stabilization Services Funding
HSP funds may not be used for ineligible activities such as:

- Capital Costs – HSP funds may not be used for major building rehabilitation, renovations or construction labor;
- Vehicle purchase, maintenance and repair;
- Personal staff furniture, personal food expenses, or transportation costs;
- Payment of temporary storage fees in arrears is not eligible;
- Client debt modifications;
- Foreclosure or homeowner financial assistance; or
- Transitional housing.
- **Last, HSP RRH and Homelessness Prevention funds may NOT be combined with other rental subsidies of the same type.**

Rapid Re-Housing and Homelessness Prevention Funds can only be used for permanent, rental housing. Clients receiving Rapid Re-Housing Assistance must have a lease or rental agreement in place.

*Grantees unsure about HSP Housing Stabilization expenses should consult with the Department prior to administering funding.*

Connection to Additional Community Resources
In addition to critical housing-related services, providers should help to connect HSP RRH and Homelessness Prevention households to resources that help them improve their safety and well-being and achieve their long-term goals. This includes access to resources related to income and health care benefits, employment, and other community-based services so that they can engage with the larger community and sustain rent payments after assistance ends.

Rent Reasonableness
HUD’s rent reasonableness standard is designed to ensure that rents being paid are reasonable in relation to rents being charged for similar units in the same market. Grantees and subgrantees should have a procedure in place to ensure that compliance with rent reasonableness standards is documented prior to an executed lease utilizing HSP Rapid Re-Housing or Homelessness Prevention assistance. To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, subgrantees should consider the entire housing cost: rent plus the cost of any utilities that are the responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and trash. Telephone, cable or satellite television service, internet service, pet fees, and late fees should be excluded. Rent must take into consideration client’s ability to pay after the subsidy has ended. Additionally, the rent cannot exceed HUD’s published Fair Market Rents (FMR) for the area as indicated in 24 CFR 88.11 (b).

Case Management for Permanent Housing
Under the HSP category Housing Stabilization Services, funds may be used for the purposes of
providing case management services for permanent housing only if a provider received funds last year for this specific activity. These services may include:

- Linking residents to supportive services such as job training, health care, budgeting counseling, parenting skills, substance treatment, etc.; and
- Staff costs for those who assist clients in applying for food, medical, and other benefits.

Please note: If service providers did not receive funding for this activity through the former Service-Linked Housing program, service providers may not use this funding for this purpose.

*Grantees unsure about HSP Housing Stabilization Services expenses should consult with the Department prior to administering HSP Housing Stabilization Services funding.*
D. HSP Allowable Activities – Homeless Management Information System (HMIS)

Homeless Management Information System (HMIS) is the information system designated and managed by local Continuums of Care (CoC) to comply with the requirements of the federal CoC Program interim rule 24 CFR 578. It is a locally-administered data system used to record and track information about individuals and families served, who are homeless or at risk of homelessness.12

1. Data Entry Expectations of Providers

Entering data into HMIS is mandatory. CoC Lead Agencies should monitor compliance with this requirement during scheduled or unscheduled monitoring visits.

- Training should also be arranged through the **HMIS coordinator** for each jurisdiction.
- All new and existing client’s information shall be updated and entered to reflect services provided **during each engagement**.
- Each participating agency shall agree to and **sign all documents regarding HMIS** policies and procedures and strictly follow all protocols regarding sharing of information.

Grantees and subgrantees must be in compliance with all requirements set forth by HUD and by the local HMIS lead agency with the exception of victim services providers. Victim service providers are prohibited in participating in the local HMIS due to confidentiality and safety concerns, but are required to establish a comparable database approved by the HMIS lead agency of the CoC. The comparable database must meet the following criteria to be compatible with the State Data Warehouse.

- Collect client-level data over time and to generate aggregate reports based on the data into comma-separated values (CSV) format.
- Meet HUD Sage requirements for Annual Performance Report (APR) data reporting, including being able to export both the CoC APR and ESG CAPER.
- May be separate module of the same HMIS service provider utilized by the CoC as a whole.

Victim services/domestic violence providers must document how they intend to ensure that data reporting policies and procedures are in place and followed while ensuring the confidentiality of participants.13

2. Communication with Clients about HMIS

Each participating subgrantee should explain the purpose of the HMIS to program participants and attempt to secure release of information documents from clients before entering data.

**Please note:** Under federal law (5 U.S.C. Section 552a), a government agency may not deny shelter or services to clients who refuse to provide their SSN. This applies to all HUD-administered McKinney-Vento Act programs and HSP.

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13 [https://safehousingpartnerships.org/sites/default/files/2017-08/CD101_CSNNEDV.pdf](https://safehousingpartnerships.org/sites/default/files/2017-08/CD101_CSNNEDV.pdf)
Eligible Activities for HMIS
HSP HMIS funding may be used towards the following activities:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines;
- Obtaining technical support;
- Paying charges for high-speed data transmission necessary to operate or contribute data to the HMIS;
- Salaries for operating HMIS activities such as data entry, monitoring, and review of data quality, and completing data analysis;
- Training staff on using the HMIS or comparable database;
- Paying costs of staff to travel to and attend HUD-sponsored and Department approved training;
- Hosting and maintaining HMIS software or data;
- Backing up, recovering, or repairing HMIS software or data;
- Upgrading, customizing, and enhancing the HMIS;
- Reporting to providers, the Continuum of Care, and the Department; and
- Conducting training on using the system or a comparable database, including travel to the training.

Unallowable Uses of HSP HMIS Funding
Funds may not be used for the following:

- Personal staff furniture, personal food expenses, or transportation.
IX. Statewide Data Collection: MDHSW Participation

Homeless Management Information System (HMIS) and the Maryland Statewide Homelessness Data Warehouse (MSHDW)

Each provider throughout all 16 CoCs contributes client data to their local HMIS system. All recipients of HSP grant funding for homeless services are required to comply with data sharing to the MSHDW. Aggregate data from these HMIS systems will then be transferred to the Maryland Statewide Homelessness Data Warehouse (MSHDW). The Data Warehouse will port data from CoC HMIS systems. All grantees are expected to be providing information that meets all data quality standards. Collection and sharing of the universal data elements within HMIS enables the state of Maryland to better assess state progress towards reducing and ending homelessness across our state.
X. HSP Program Recordkeeping Requirements

HSP follows the following HUD Homeless and At Risk of Homelessness Recordkeeping Requirements:\textsuperscript{14}

1. Homeless Status – a household lacks a fixed, regular, and adequate nighttime residence. To certify homeless status, the subgrantee must provide documentation of one of the following in the order of priority:
   - Written referral by another housing or service provider; or
   - Written observation by the outreach worker; or
   - Certification by the individual or head of household seeking assistance stating that household was living on the streets or in shelter.

Supporting documentation in client files should include examples of the following related to recent exits from an institution:
   - Discharge paperwork or written/oral referral; or
   - Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution.

Homeless Recordkeeping Requirements for Victim Service Providers
For households that are considered homeless due to domestic violence, below is the following documentation required from specific service providers:

For victim service providers:
   - An oral statement by the household seeking assistance explaining that they have no subsequent residence and they lack resources. This self-certification statement must be signed by the household.

A non-victim service provider must document all of the following:
   - Oral statement by the household seeking assistance that they are fleeing domestic violence. This statement is documented by a self-certification of household circumstance or case worker intake notes;
   - Certification by the individual or head of household that no subsequent residence has been identified; and
   - Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

2. At Risk of Homelessness Status – A household with an annual income below 30\% of 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. To certify at risk of homeless status, the subgrantee must document all of the following:
   - Written certification from intake worker that household is at risk of homelessness;
   - Written certification that household has an annual income below 30\% of median family

\textsuperscript{14} https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf
income for the area; and
• Certification by the individual from the intake worker that the household does not have sufficient resources or support network to prevent them from becoming homeless.

**Supporting Documentation in client files should include the following:**
• Eviction notice or lease termination from household in need of homeless prevention assistance;
• Proof of that household has an annual income below 30% of the median family income for the area; and
• Proof that household does not have sufficient resources or support networks (such as family or friends) to prevent them from being homeless.

**Documenting Order of Priority for Documenting Homeless or At Risk of Homelessness Status**
The order of priority for evidence establishing and verifying homeless status for client files is as follows:

a. **Third-party documentation** – documents provided by an outside source such as another service provider or agency on official letterhead, or
b. **Staff/Intake worker observation** – written documentation by subgrantee program staff on official letterhead, or
c. **Certification from the person seeking assistance** – Subgrantee staff can allow households experiencing homelessness to write down that they are homeless and sign an intake document that certifies the information given to the program is true.

Third party source documents are the preferred method of verifying and documenting housing status. However, lack of third party documentation must not prevent a household experiencing homelessness from being immediately admitted to emergency shelter, receiving street outreach services, or receiving services provided by a victim service provider.
XI. Grievance and Termination Procedure

HSP grantees and subgrantees must maintain written grievance procedures for termination and denial of benefits. The written procedures should be submitted to the Department with the CoC grant application. This will allow the Department to review why program participants are denied from the program. Additionally, a copy of the written grievance procedure must be provided to all program applicants or recipients of service benefits. Below is the following process for termination of benefits.

Requirements for Termination of Housing Subsidy or Shelter

Before terminating housing subsidy or shelter benefits, the grantee or provider shall provide the recipient with notice and opportunity for an informal hearing. The notice should include:

- The date that termination of benefits will be effective;
- A statement of reasons for the decision to terminate benefits;
- Notification that if the client does not agree with the decision, the client may request an informal hearing for review of the decision;
- The procedures for requesting an informal hearing; and,
- The deadline for requesting an informal hearing (client must be given at least 14 after the date of notice).

A. Notice of Hearing: Upon receipt of a timely request for an informal hearing, the grantee or provider shall schedule an informal hearing and provide notice to the client, which includes:

- Date of issuance of the notice;
- Date, time, and location of the informal hearing (must be conducted within 14 after the date of notice);
- The issue to be heard during the informal hearing;
- Notice that failure to appear will result in the termination decision being upheld;
- The client’s right to bring evidence, witnesses, and legal representation to the hearing, at the client’s own expense;
- The client’s right to review relevant documents in the possession of the grantee or provider, prior to the hearing; and,
- Notice that the grantee or provider may request to review relevant documents in the possession of the client prior to the hearing.

B. An informal hearing must be conducted by a person who neither made nor approved of the termination decision or is subordinate to that person.

C. Both the client and the grantee or subgrantee will have the opportunity to:

- Provide an opening statement;
- Present evidence;
- Question witnesses;
- Examine documents that are the basis for the termination decision; and,
- Request that the client, grantee or subgrantee staff be present to answer questions;
- Present legal argument(s).
D. Written Decision

- This shall be provided by the person conducting the hearing within 30 days.
- Benefits in this section may NOT be terminated until a decision is issued affirming the terminating decision.
- Any decision affirming termination of benefits shall provide information to the client on the procedure for requesting an Appeal.

Requirements for Termination of other Benefits
For benefits other than housing subsidy or shelter, the grantee or provider shall provide clients with a notice of termination and the opportunity for an informal review. Benefits may be terminated prior to conduct of the informal review. The notice shall include:

- The action being taken, the reasons for such action being taken, and the effective date;
- Notification that if the client does not agree with the decision, the client may request an informal hearing for review of the decision;
- The procedures for requesting an informal hearing; and,
- The deadline for requesting an informal hearing.

A. Notice of Informal Review: Upon receipt of a timely request for an informal hearing, the grantee or provider shall schedule an informal hearing and provide notice to the client, which includes:

- Date of issuance of the notice;
- Date, time, and location of the informal review;
- The issue to be heard during the informal review;
- The client’s right to present information in support of the client’s objections; and,
- Notice that failure to appear will result in the decision being upheld.

B. Conduct of an Informal Review

- Must be conducted by a person who neither made nor approved of the termination decision nor is subordinate to that person.

C. Decision

- The decision resulting from the informal review may be provided orally at the informal review or in writing no later than 30 days afterwards.
- If the decision resulting from the informal review does NOT uphold the termination of benefits, and benefits have already been terminated, the grantee or provider shall provide retroactive benefits to cover any loss in benefits during the period between the termination and reinstatement of benefits.
- The decision shall provide information to the client on the procedure for requesting an Appeal.

Appeal of Grievance Decisions
If a client is not satisfied with the Decision rendered through the process above, the client may submit a written appeal to the Department within 30 days of the decision.
XII. Administrative Funds

A. Overview of HSP Administrative Funds
Grantees are eligible to utilize up to 7.5% of the HSP funding grant to cover administrative activities. This may be shared between the grantee and subgrantee if applicable and is the decision of the grantee or CoC. Administrative costs cover expenses dedicated to managing the grant. Eligible administration activities include:

- Preparing and reviewing HSP applications;
- HSP financial reporting such as processing disbursement invoices; and
- HSP subgrantee monitoring and or training.

The CoC Lead Agency may retain all funding requested for administrative costs, or may subgrant that funding to any agencies that are involved in carrying out those functions.

Please note: HSP Administrative staff costs are solely meant for the purpose of managing, coordinating, and oversight of administrative responsibilities related to the HSP grant. This does not include administering direct services for any of the HSP component areas.
XIII. Monthly Invoicing Requests

Requirements for Monthly Invoicing Request
To receive reimbursement for eligible HSP activities, grantees should submit invoice documentation to hspinvoices.dhcd@maryland.gov as early as the 15th but no later than the 30th of each month. With each monthly submission, grantees should include:

1. **HSP Grant Disbursement Form** – This document should be signed, dated, and submitted in PDF format.

2. **HSP Subgrantee Invoice** – Only one invoice per provider is required.

3. **Appendix 7: HSP Transaction Summary Report Sample** – Instead of submitting copies of all expenditures or bills paid for with HSP funds, the HSP Transaction Summary Report serves as a template to summarize all expenditures under each allowable category (outreach, emergency shelter, housing stabilization, and administrative). The use of Appendix 7: HSP Transaction Summary Report Transaction form is not required, but it should serve as a guide for what the Department requires in order process invoices. The category totals and overall total must align with the amount submitted on the HSP Grant Disbursement Form. For example, if funds are used to pay for staff, each staff name, title, and payroll amount must be listed on the summary report. If funds are used to provide a security deposit or rental assistance for clients, the last name of each client and amount paid must be clearly noted on the summary page.

**Please note:** Supporting documentation for HSP invoices should be maintained onsite by the subgrantee. This information will be reviewed thoroughly by Department staff during HSP annual monitoring visits.

Once the documentation is submitted electronically, the Department’s internal processing begins. Prior to submitting invoices to the Department, HSP Grantees should thoroughly review all invoice documents for proper allowable expenses, supporting documentation, and accurate financial budgeting. **Failure to review invoices or provide the required documentation will result in delayed invoice processing.**

**Ineligible Use Policy**
If ineligible expenses are discovered during the Department’s internal review process, the Department will contact the grantee for clarification as needed. Any funds confirmed to be ineligible will be deducted from the subgrantee invoice accordingly.

**HSP Budget Revisions**
HSP grantees must consult with the Department before any revisions to the budget are approved. Revisions moving funds across different components are allowed on a case-by-case basis, but at the discretion of the Department.

**Concerns about HSP Invoices**
If grantees have concerns regarding the amount of funds within a specific category, they should reach out to Department staff as soon as possible for resolution.
XIV. Matching Requirements

All CoCs must provide matching funds of **at least 25% of the total HSP grant**. This match requirement may be met at the grantee or subgrantee level, allowing CoCs or providers to use programs or services funded by local and private resources as a match for this funding.

In order to meet the match requirement:

1) Matching contributions must be used to meet the HSP goals: reducing the number of people who become homeless, shortening the length of time people are homeless, and reducing the number of people who return to homelessness.

2) Matching funds must be received and expended within the HSP grant year contract period.

3) Contributions may not be used to meet multiple match requirements. This includes using match funds from a previous HSP grant - matching funds may only be counted once per year.

4) Matching contributions may be obtained from any local or private source. No federal sources may be used, except funding provided by the Community Services Block Grant (CSBG) for the purpose of meeting HSP goals. Additionally, no state sources may be used, except funding provided through the Emergency Assistance Program (EAP), formerly known as the Homelessness Prevention Program. The grantee must ensure the laws governing any funds used as matching contributions do not prohibit those funds from being used to match HSP funds. Additionally, if HSP funds are used to satisfy the matching requirements of another federal program, funding from that program may not be used to satisfy the matching requirements of HSP.

Matching funds may include the following:

1) Cash contributions. Cash expended for allowable costs of the grantee/subgrantee.

2) Non-cash contributions. The value of any real property, equipment, goods or services contributed by the grantee or subgrantee towards meeting the HSP goals. This source of match may include staff hours to help HSP administration activities such as on-site monitoring assessments and invoice processing if those activities are not funded under the HSP administrative category.
HSP CoC Leads (grantees) are required to monitor all subgrantees on site at least once annually. Although HSP requires at least one annual monitoring assessment, HSP grantees should look at the monitoring process as an ongoing relationship with subgrantees that involves continuous communication and evaluation. The goal of this partnership is to help both grantees and subgrantees enhance performance and to make the best possible use of HSP funds.

**Priority Areas for HSP Monitoring**

The areas for monitoring and oversight include the following:

1. **Financial Monitoring**

HSP grantees will conduct the financial monitoring of subgrantees. Financial monitoring will include a review of financial records related to the HSP grant. Additionally, grantees should certify that HSP funds are being used to benefit people experiencing homelessness effectively and at a reasonable cost. Subgrantees should make available all accounting records relevant to HSP funds during grantee monitoring visits.

Additional areas of review for financial monitoring include:


- **Invoicing** – Ensure that grantees and subgrantees financial records align with the invoicing documentation submitted to the Department as well as supporting documentation maintained in their financial records. This includes:
  - General ledger print outs and supporting documentation for eligible expenses provided for invoicing. Supporting documentation consists of receipts, paystubs for staff salaries, checks to vendors, etc.

- **Financial Audits** – Grantees must review subgrantees’ most recent audit for sufficient accounting management. If subgrantee has not received an audit, grantee should review recent board meeting notes for the organization’s financial report.

- **Match Documentation** – Grantees are expected to monitor subgrantees for proper match documentation. Grantees must review documents such as general ledgers or journals entries to prove matching funds for HSP have been committed and/or spent.

2. **Programmatic Monitoring**

In addition to monitoring financial management, grantees are required to monitor subgrantees for programmatic oversight. Below are the requirements for subgrantee program monitoring.

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Case File Documentation Chart
Documentation of client eligibility and services received must be maintained in printed or electronically saved client case files, including files for applicants found to be ineligible. File documentation will be the basis of CoC subgrantee monitoring. At minimum, client files must contain the following:

a. Outreach
   • Homeless Status;
   • Verification of participation in appropriate Homeless Management Information System (HMIS);
   • Signed Release of Information Form; and
   • Case notes regarding information about case management, housing or social services administered to the client.

b. Emergency Shelter
   • Homeless Status;
   • Verification of participation in appropriate Homeless Management Information System (HMIS);
   • Signed Release of Information Form;
   • Intake form and assessment of household needs;
   • Case notes regarding information about case management or social services administered to client while in emergency shelter; and
   • Evidence of referrals to social service and other resources.

Please note: Grantees should complete Appendix 3: Minimum Habitability Standards for Emergency Shelter Checklist during the monitoring visit of the emergency shelter.

c. Rapid Re-Housing Client Files
   • Homeless Status;
   • Verification of participation in appropriate Homeless Management Information System (HMIS);
   • Connection to other community resources or public benefits;
   • Signed Release of Information Form;
   • Intake form and assessment of household needs;
   • Verification of client income and assets-intake form should include questions about personal assets or income of all program participants;
   • Rent Reasonableness documentation;
   • Completion of Appendix 5: Minimum Habitability Standards for Permanent Housing Checklist; and
   • Appendix 6: HSP Lead-Based Paint Screening Worksheet.

d. Homelessness Prevention
   • At Risk of Homeless Status;
   • Annual income below 30% of median family income for the area;
   • Lack of other resources or support to obtain or sustain permanent housing;
   • Connection to other community resources or public benefits;
   • Signed Release of Information Form;
• Intake form and assessment of household needs;
• Rent Reasonableness documentation (for new permanent housing);
• Verification of client income and assets- intake form should include questions about personal assets or income of all program participants;
• Completion of Appendix 5: Minimum Habitability Standards for Permanent Housing Checklist; and
• Appendix 6: HSP Lead-Based Paint Screening Worksheet.

To conduct a comprehensive HSP monitoring assessment, grantees are required to utilize the HSP Monitoring Assessment Tool. This document will provide an overview of all HSP component areas to review.

Moreover, HSP grantees are required to record any concerns or findings from the subgrantee assessments in order to discuss those concerns with the Department during the grantee (CoC) monitoring. Based on the information provided to the Department by the grantee, technical assistance may be provided.

The monitoring process is a collaborative effort between the Department, grantees, and subgrantees, allowing us to ensure that HSP funds are not only being used properly, but are having the intended effect of serving those who are the most vulnerable.
Appendices
The Maryland Department of Housing and Community Development, Division of Neighborhood Revitalization, administers the Homelessness Solutions Program (HSP). These funds may be used to provide a wide range of services and supports under the four program components: Outreach, Housing Stabilization Services, Emergency Shelter, and HMIS. Each component is described in the tables below, accompanied by a list of corresponding HSP activities and eligible costs.

*Note: Please reference the program regulations at 24 CFR Part 576 and at the Housing and Community Development article 4-1403, 4-1406, 4-2108, 4-2205(a)(4) and 4-2209(b) Annotated Code of Maryland for complete information about all eligible costs and program requirements.

### Outreach

These activities are designed to meet the immediate needs of unsheltered homeless people by connecting them with emergency shelter, housing, and/or critical health services.

<table>
<thead>
<tr>
<th>Activity types:</th>
<th>Services</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(e.g. Homeless Resource Days or Point-in-Time Counts)</td>
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<tr>
<td><strong>Eligible costs:</strong></td>
<td><strong>Eligible costs:</strong></td>
</tr>
<tr>
<td>• Engagement</td>
<td>• Training and Survey materials</td>
</tr>
<tr>
<td>• Case Management</td>
<td>• Promotional Items (e.g. t-shirts, water bottles, etc.)</td>
</tr>
<tr>
<td>• Transportation (Mileage/Public Transit)</td>
<td>• Blankets, toiletries, etc.</td>
</tr>
<tr>
<td>• Emergency and Mental Health Services</td>
<td>• Incentives (e.g. gift cards)</td>
</tr>
<tr>
<td>• Services for Special Populations (e.g. Homeless Youth, Veterans, or Victims of Domestic Violence)</td>
<td>• Food/beverages for staff/volunteers</td>
</tr>
</tbody>
</table>

### Housing Stabilization Services

These activities are designed to help people locate, pay for, and remain in permanent housing, and to prevent an individual or family from moving into an emergency shelter or from living in a public or private place not meant for human habitation. They are also separated by the type of client being served:

- **Rapid Re-Housing (RRH)** covers services to individuals and households that lack a fixed, regular, and adequate nighttime residence.
- **Homelessness Prevention** is for households who not have sufficient resources or support networks immediately available to prevent them from becoming homeless AND have an annual income below 30% of the area median income.
- **Case Management for Permanent Housing** covers case management services for residents in permanent housing.  

<table>
<thead>
<tr>
<th>Activity types:</th>
<th><strong>Financial Assistance</strong></th>
<th><strong>Services Costs</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eligible costs:</strong></td>
<td><strong>Eligible costs:</strong></td>
<td><strong>Eligible costs:</strong></td>
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<tr>
<td>• Short to medium term rental assistance (0 – 24 months)</td>
<td>• Rental Application Fees</td>
<td>• Housing Search and Placement</td>
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<tr>
<td>• Rental arrears</td>
<td>• Security Deposits</td>
<td>• Housing Stability Case Management</td>
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<td></td>
<td>• First or Last Month’s Rent</td>
<td>• Mediation</td>
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<td></td>
<td>• Utility Deposits/ Payments</td>
<td>• Legal Services</td>
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<tr>
<td></td>
<td>• Moving Costs</td>
<td>• Credit Repair and/or Counseling</td>
</tr>
</tbody>
</table>

1 If service providers did not receive funding for this activity through the former Service-Linked Housing program, service providers may not use this funding for this purpose.
**Appendix 1: HSP Program Components Quick Reference Guide**

**Emergency Shelter:** These activities are designed to connect people with immediate access to overnight shelter in order to respond to a crisis, paying for the operating costs of shelters, and providing essential services.

<table>
<thead>
<tr>
<th>Activity type:</th>
<th>Services</th>
<th>Shelter Operations</th>
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<tbody>
<tr>
<td><strong>Eligible costs:</strong></td>
<td></td>
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<tr>
<td>• Case Management:</td>
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<tr>
<td>o Staff salaries for those providing services.</td>
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<tr>
<td>• Child Care while in shelter</td>
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<tr>
<td>• Supportive Services (in accordance with clients’ health insurance policies, if applicable):</td>
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<tr>
<td>o Outpatient Health</td>
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<td>o Mental Health</td>
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<tr>
<td>o Substance Abuse Treatment</td>
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<tr>
<td>o Legal</td>
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<tr>
<td>o Special Populations (e.g. Homeless Youth, Veterans, or Victims of Domestic Violence).</td>
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<tr>
<td>• Transportation (e.g. gas/mileage to get clients to/from appointments or interviews, public transportation fees, or cab fares)</td>
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<tr>
<td>• Training:</td>
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<td></td>
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<td>o Education Services</td>
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<td>o Employment Assistance</td>
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<tr>
<td>o Budget Counseling &amp; Financial Capability</td>
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<tr>
<td>o Life and Interpersonal Skills</td>
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<tr>
<td>o Parenting Skills</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Eligible costs:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Facility Insurance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Security</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Facility Maintenance (Minor/Routine Repairs, Trash Removal, Snow Removal, Pest Control, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Shelter Utilities (Electricity, Gas, Water, Fuel, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Necessary Equipment &amp; Supplies (cleaning, linen, laundry, hygiene kits, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Food and/or Food Service Delivery</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Essential Furniture for shelter residents (beds, chairs, cribs, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Hotel/Motel Vouchers (where no appropriate shelter is available for an individual or family)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Staff Salaries (for those working directly with clients)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Emergency Cold Weather Shelter Beds</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**HMIS:** These activities are designed to fund HSP grantees and subgrantees’ participation in the HMIS collection and analyses of data on individuals and families who are homeless and at risk of homelessness.

<table>
<thead>
<tr>
<th>Activity type: HMIS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eligible costs:</strong></td>
</tr>
<tr>
<td>• HMIS Lead (as designated by the CoC) costs for managing the HMIS system.</td>
</tr>
<tr>
<td>• Software Licenses for HMIS systems.</td>
</tr>
<tr>
<td>• Staff Time spent contributing data to the HMIS designated by the CoC for the area:</td>
</tr>
<tr>
<td>o Training</td>
</tr>
<tr>
<td>o Technical Support</td>
</tr>
<tr>
<td>• Establishing &amp; operating a comparable database (for Victim Service Providers)</td>
</tr>
</tbody>
</table>

**Administration:** Costs related to the planning and execution of HSP activities. (Note: This doesn’t include staff and overhead costs directly related to carrying out direct services.)

<table>
<thead>
<tr>
<th>Activity type: Administrative Activities.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eligible costs:</strong></td>
</tr>
<tr>
<td>• General management, oversight, and coordination</td>
</tr>
<tr>
<td>• Monitoring/Compliance &amp; Evaluation</td>
</tr>
<tr>
<td>• Travel costs for Monitoring Subgrantees</td>
</tr>
<tr>
<td>• Training on HSP requirements</td>
</tr>
<tr>
<td>• Salary/wages for program administration staff</td>
</tr>
</tbody>
</table>
Appendix 2: Low Barrier Shelter Checklist

100,000 Homes Campaign’s Common Eligibility Criteria for Emergency Shelters

Community Solutions and the Center for Urban Community Services (CUCS)\(^1\) produced this checklist to help communities discuss ways to lower barriers to emergency shelter. The first section of the checklist offers a list of eligibility and continued stay criteria that are acceptable when providing emergency shelter. The second section offers a list of eligibility and continued stay criteria that are contrary to low-barrier shelter.

<table>
<thead>
<tr>
<th>A</th>
<th>Eligibility and Continued Stay Criteria <strong>should include the following:</strong></th>
<th>Does the program require these things? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Homeless (HUD Definition)</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>Age 18 or older</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>Ambulatory and not requiring hospital or nursing home care</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>Agree to be nonviolent</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>Agree not to use or sell drugs or illegal substances on the premises</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Agree to treat other clients, staff and the property with respect</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>Agree to obey fire and other safety regulations</td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>Bed is reserved nightly for client (as long as the criteria above is met)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B</th>
<th>Criteria that <strong>should not be included</strong> as a condition of eligibility or continued stay</th>
<th>Does the program require these things? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Sobriety and/or commitment to be drug free</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>Requirements to take medication if the client has a mental illness</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>Participation in religious services</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>Participation in drug treatment services (including NA/AA)</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>Proof of citizenship</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Identification</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>Require a referral from the police, hospital or other service provider</td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>Payment or ability to pay (though saving plans are encouraged)</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) [http://100khomes.org/resources/high-performance-series]
Appendix 3: HSP Minimum Habitability Standards for Emergency Shelters Checklist

HSP Minimum Habitability Standards for Emergency Shelters

This checklist serves as a tool to ensure HSP subgrantees receiving emergency shelter funding are meeting minimum safe and sanitary standards indicated below. Based on HUD’s ESG Minimum Habitability Standards for Emergency Shelter and Permanent Housing, HSP grantees must complete this form when executing a HSP on-site monitoring visit of an HSP subgrantee that operates an emergency shelter.

Instructions: To complete this form, place a check mark in the correct column to indicate whether the property is approved or deficient with respect to each standard. Any deficiencies identified are considered a “finding” and should be documented for the Department’s review. HSP grantees must keep a copy of all completed checklists on file.

<table>
<thead>
<tr>
<th>Approved</th>
<th>Deficient</th>
<th>Shelter Standards</th>
</tr>
</thead>
</table>
|          |           | 1. Structure and materials  
The shelter building is structurally sound to protect the residents from the elements and does not pose any threat to the health and safety of the residents. |
|          |           | 2. Access  
Where applicable, the shelter is accessible in accordance with:  
a. Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8;  
b. The Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and  
c. Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35. |
|          |           | 3. Space and security  
Except where the shelter is intended for day use only, the shelter provides each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings. |
|          |           | 4. Interior air quality  
Each room or space within the shelter has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents. |
|          |           | 5. Water Supply  
The shelter’s water supply is free of contamination. (Reviewer should turn on bathroom sink or kitchen faucet to certify water appears sanitary.) |
|          |           | 6. Sanitary Facilities  
Each program participant in the shelter has access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste. |
|          |           | 7. Thermal environment  
The shelter has any necessary heating/cooling facilities in proper operating condition. |

<table>
<thead>
<tr>
<th>Appendix 3: HSP Minimum Habitability Standards for Emergency Shelters Checklist</th>
</tr>
</thead>
</table>
| **8. Illumination and electricity**  
  a. The shelter has adequate natural or artificial illumination to permit normal indoor activities and support health and safety.  
  b. There are sufficient electrical sources to permit the safe use of electrical appliances in the shelter. |
| **9. Food preparation** Food preparation areas, if any, contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner. |
| **10. Sanitary conditions**  
The shelter is maintained in a sanitary condition. |
| **11. Fire safety**  
  a. There is at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors are located near sleeping areas.  
  b. All public areas of the shelter have at least one working smoke detector.  
  c. The fire alarm system is designed for hearing-impaired residents.  
  d. There is a second means of exiting the building in the event of fire or other emergency. |

**CERTIFICATION STATEMENT**

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

**COMMENTS:**

Name of CoC: ____________

HSP subgrantee (name of emergency shelter): _______________________________________

Street Address: __________________________________________ City: ____________

State: ____________ Zip: ________

Evaluator Name: ____________ Evaluator Signature: ____________ Date of review: ________
Appendix 4: The Core Components of Rapid Re-Housing

Below are the **Core Components of Rapid Re-Housing (RRH)** created by the National Alliance to End Homelessness (NAEH) with input from several federal agencies. In order to be successful in the implementation of RRH services, HSP grantees and subgrantees must meet all three core components, “FIND, PAY, and STAY”. ¹

- **Housing Identification (“Find”)** - The primary focus of services in rapid re-housing is to provide help with finding housing and assist with the barriers that prevent access to housing. Housing identification services include helping households find appropriate rental housing in the community, contacting and recruiting landlords to provide housing for individuals and tenant qualifications, assisting households to complete applications and prepare for interviews with landlords, helping households to determine if a housing option meets their needs and preferences, and helping with moving.

- **Rent and Move-In Assistance (“Pay”)** - The primary barrier to permanent housing for many families experiencing homelessness is limited finances. To address this barrier, rapid re-housing programs offer financial assistance to **cover move-in costs, deposits, and the rental and/or utility assistance** necessary to allow individuals and families to move immediately out of homelessness and into permanent housing.

**Determining the Rental Assistance**

Rental assistance for permanent housing **under HSP regulations is allowed for up to 24 months**; however, it is **typically best practice to provide assistance for three to six months**. Maximizing the effectiveness of the program means providing a specific household with the right amount of assistance to get them stabilized. Therefore, the amount of assistance required may vary depending on the client’s circumstance. Agencies should have a process in place for determining how much assistance each client requires at intake and to assess ongoing need throughout the length of time the client is receiving assistance.

- **Rapid Re-Housing Case Management and Services (“Stay”)** - A critical component to rapid re-housing success is housing-focused case management. Case management and services may be provided to households to help overcome and troubleshoot barriers to maintain permanent housing. Effective case management services in rapid re-housing programs can help individuals and families select among various permanent housing options based on their needs, preferences, and financial resources, address issues that may impede access to housing (such as credit history, arrears, and legal issues), and negotiate appropriate lease agreements with landlords. Housing case management can also monitor participants’ housing stability after securing housing and during program participation, ideally through home visits and communication with the landlord. It is also best practice for subgrantees to follow-up with households after completion of the program.

HSP Minimum Habitability Standards for Permanent Housing

This checklist serves as a tool to ensure HSP subgrantees receiving emergency shelter funding are meeting minimum safe and sanitary standards indicated below. Based on HUD’s ESG Minimum Habitability Standards for Emergency Shelter and Permanent Housing, HSP grantees must complete this form when executing an on-site housing assessment of a housing unit receiving HSP homelessness prevention or RRH assistance. This checklist may be completed by an employee of the service provider and does not require a special certification or training. Evaluators are expected to use their best judgment in determining if a standard is or is not met. **Instructions:** To complete this form, place a check mark in the correct column to indicate whether the property is approved or a concern with respect to each standard. HSP subgrantees must keep a copy of completed checklists in the respective homelessness prevention or RRH client file.

<table>
<thead>
<tr>
<th>Approved</th>
<th>Concern</th>
<th>Permanent Housing Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>1. <em>Structure and materials</em> &lt;br&gt;The structure is sound to protect the residents from the elements and not pose any threat to the health and safety of the residents.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. <em>Space and security</em> &lt;br&gt;Each resident is provided adequate space and security for themselves and their belongings. Each resident is provided an acceptable place to sleep.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. <em>Interior air quality</em> &lt;br&gt;Each room or space has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4. <em>Water Supply</em> &lt;br&gt;The water supply is free from contamination. (Reviewer should turn on bathroom sink or kitchen faucet to certify water appears sanitary.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5. <em>Sanitary Facilities</em> &lt;br&gt;Residents have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6. <em>Thermal environment</em> &lt;br&gt;The housing has any necessary heating/cooling facilities in proper operating condition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7. <em>Illumination and electricity</em> &lt;br&gt;The structure has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the structure.</td>
</tr>
</tbody>
</table>

---

### Appendix 5: HSP Minimum Habitability Standards for Permanent Housing Checklist

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>8. <strong>Food preparation</strong></td>
<td>All food preparation areas contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.</td>
</tr>
<tr>
<td>9. <strong>Sanitary condition</strong></td>
<td>The housing is maintained in sanitary condition.</td>
</tr>
</tbody>
</table>

#### Fire safety
- There is a second means of exiting the building in the event of fire or other emergency.
- The unit includes at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit.
- If the unit is occupied by hearing-impaired persons, smoke detectors have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

10. The public areas are equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors.

---

**CERTIFICATION STATEMENT**

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

- [ ] Property meets all of the above standards.
- [x] Property does not meet all of the above standards.

**COMMENTS:**


Name of CoC: _____________  
HSP subgrantee: __________________________ HSP Client Name: ____________________  
Street Address: ____________________________________________________________  
Apartment #: _____________  
City: __________________________ State: _________ Zip: _________  
Evaluator Signature: __________________________ Date of review: _________  
Evaluator Name: __________________________
Appendix 6: Lead-Based Paint Screening Worksheet

HSP Lead Screening Worksheet

**About this Tool**
The HSP Lead-Based Paint Screening Worksheet is intended to guide grantees through the visual lead-based paint assessment process for minimum habitability compliance. As a requirement of the Department, HSP grantees and subgrantees that receive HSP funding must comply with The Lead-Based Paint Poisoning Prevention Act of 1973 and the Residential Lead-Based Paint Hazard Reduction Act of 1992. Based on the requirements of HUD’s Emergency Solutions Grant, this worksheet should be used to document any visual assessment of potential hazards related to lead-based paint. **If the property was built before 1978 and children under the age of six will be living in the unit, this worksheet must be completed.** Evaluators are expected to use their best judgment in determining if a standard is or is not met. If evaluators find there is a concern regarding lead-based paint in the housing unit, they are encouraged to contact the MD Department of Environment’s Lead Poisoning and Prevention program (410) 537-3825 or 1-800-633-6101 ext. 3825 to discuss the safety concerns. Furthermore, the completed worksheet along with any additional documentation should be kept in respective homelessness prevention or RRH client file.

**INSTRUCTIONS**
To prevent lead-poisoning in young children, HSP grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973. This screening worksheet will help program staff determine whether a unit is subject to a visual assessment, and if so, how to proceed. Additionally, evaluators may review the [HUD Lead Based Paint Visual Assessment Training Course](https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm) to identify signs of lead-based paint. A copy of the completed worksheet along with any related documentation should be kept in each grantee or program participant’s file. Please note: ALL pre-1978 properties are subjected to this visual lead paint assessment.

**BASIC INFORMATION**

Name of Client: ________________________________
Address: ______________________________________ Apt: _________________
City: ________________________________________ State: _________________
HSP Program Staff: ______________________________

**PART 1: DETERMINE WHETHER THE UNIT IS SUBJECT TO A VISUAL ASSESSMENT**
If the answer to one or both of the following questions is ‘no,’ a visual assessment is not triggered for this unit and no further action is required at this time. Place this screening worksheet and related documentation in the program participant’s file. If the answer to both of these questions is ‘yes,’ then a visual assessment is triggered for this unit and program staff should continue to Part 2.

1. **Was the leased property constructed before 1978?**
   - Yes
   - No

2. **Will a child under the age of six be living in the unit occupied by the household receiving HSP assistance?**
   - Yes
   - No

---

1 [https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm](https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm)
PART 2: DOCUMENT ADDITIONAL EXEMPTIONS
If the answer to any of the following questions is ‘yes,’ the property is exempt from the visual assessment requirement and no further action is needed at this point. Place this screening sheet and supporting documentation for each exemption in the program participant’s file.

If the answer to all of these questions is ‘no,’ then continue to Part 3 to determine whether deteriorated paint is present.

1. Is it a zero-bedroom or SRO-sized unit? ____Yes ____No

PART 3: DETERMINE THE PRESENCE OF DETERIORATED PAINT
To determine whether there are any identified problems with paint surfaces, program staff should conduct a visual assessment prior to providing HPRP financial assistance to the unit as outlined in the HUD Lead Based Paint Visual Assessment Training Course.\(^2\)

If no problems with paint surfaces are identified during the visual assessment, then no further action is required at this time. Place this screening sheet and certification form (Attachment A) in the program participant’s file.

If any problems with paint surfaces are identified during the visual assessment, then continue to Part 4 to determine whether safe work practices and clearance are required.

1. Has a visual assessment of the unit been conducted? ____Yes ____No

2. Were any problems with paint surfaces identified in the unit during the visual assessment? ____Yes ____No

PART 4: DOCUMENT THE LEVEL OF IDENTIFIED PROBLEMS
All deteriorated paint identified during the visual assessment must be repaired prior to clearing the unit for assistance. However, if the area of paint to be stabilized exceeds the minimum levels (defined below), the use of lead safe work practices and clearance is required.

If deteriorating paint exists but the area of paint to be stabilized does not exceed these levels, then the paint must be repaired prior to clearing the unit for assistance, but safe work practices and clearance are not required.

1. Does the area of paint to be stabilized exceed any of the minimum levels below?
   - 20 square feet on exterior surfaces ____Yes ____No
   - 2 square feet in any one interior room or space ____Yes ____No
   - 10 percent of the total surface area on an interior or exterior component with a small surface area, like window sills, baseboards, and trim ____Yes ____No

If any of the above are ‘yes,’ then safe work practices and clearance are required prior to clearing the unit for assistance.

\(^2\) [https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm](https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm)
PART 5: CONFIRM ALL IDENTIFIED DETERIORATED PAINT HAS BEEN STABILIZED

Program staff should work with property owners/managers to ensure that all deteriorated paint identified during the visual assessment has been stabilized. If the area of paint to be stabilized does not exceed the minimum level, safe work practices and a clearance exam are not required (though safe work practices are always recommended). In these cases, the HSP program staff should confirm that the identified deteriorated paint has been repaired by conducting a follow-up assessment.

If the area of paint to be stabilized exceeds the minimum level, program staff should ensure that the clearance inspection is conducted by an independent certified lead professional. A certified lead professional may go by various titles, including a certified paint inspector, risk assessor, or sampling/clearance technician. Note, the clearance inspection cannot be conducted by the same firm that is repairing the deteriorated paint.

1. Has a follow-up visual assessment of the unit been conducted?
   _____Yes   _____No   _____ Not Applicable – The area of paint to be stabilized did not exceed the minimum levels.

2. Have all identified problems with the paint surfaces been repaired? Were all identified problems with paint surfaces repaired using safe work practices?
   _____Yes   _____No   _____ Not Applicable – The area of paint to be stabilized did not exceed the minimum levels.

3. Was a clearance exam conducted by an independent, certified lead professional?
   _____Yes   _____No

4. Did the unit pass the clearance exam? _____Yes   _____No

5. Is a copy of the clearance exam in client file? _____Yes   _____No
I, __________________________, CERTIFY THE FOLLOWING:

- I have completed HUD’s online visual assessment training and am a HUD-certified visual assessor.
- I conducted a visual assessment at (enter property address and unit number) ___________ on (enter date of assessment) ________________.
- No problems with paint surfaces were identified in the unit or in the building’s common areas.

____________________________________
(Signature)
### HSP Accounting Transaction Report Sample

*Please note: This is a sample of a HSP Summary Report that is required monthly to receive reimbursement for expenditures. Costs should be summarized by HSP spending category (outreach, housing stabilization, emergency shelter, etc.).*

From Date: 07/01/2018  
To Date: 07/31/2018  
From Account: 1234-567-891011  
To Account: 1213-1415-161718  
Project: Homeless Solutions Program Grant  
Run Date: 08/01/2018  
Username: Accounting Manager XYZ

<table>
<thead>
<tr>
<th>HSP Category</th>
<th>Date</th>
<th>Description</th>
<th>Name</th>
<th>Check #</th>
<th>Vendor</th>
<th>Amt Paid</th>
<th>Previous Balance</th>
<th>Balance Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outreach - Services</td>
<td>7/15/2018</td>
<td>Payroll - Case Manager #1</td>
<td>Bobby Joe</td>
<td>1234</td>
<td></td>
<td>$2,500.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outreach - Services</td>
<td>7/20/2018</td>
<td>Mileage Reimbursement</td>
<td>John Smith</td>
<td>5678</td>
<td></td>
<td>$20.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$2,520.00</td>
<td></td>
</tr>
<tr>
<td>Housing Stabilization</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rapid Rehousing - Rental Assistance</td>
<td>7/1/2018</td>
<td>July Rent</td>
<td>John Smith</td>
<td>1310</td>
<td>ABC Realty Group</td>
<td>$500.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>7/2/2018</td>
<td>July Rent</td>
<td>Jane Doe</td>
<td>1311</td>
<td>Capital Properties, LLC</td>
<td>$300.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Homelessness Prevention - Rental Assistance</td>
<td>7/7/2018</td>
<td>July Rent</td>
<td>Kathy Curtains</td>
<td>1610</td>
<td>XYZ Properties, Inc.</td>
<td>$300.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>7/10/2018</td>
<td>July Rent</td>
<td>Candace Perkins</td>
<td>1700</td>
<td>WBC Properties, Inc.</td>
<td>$200.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Homelessness Prevention - Case Management</td>
<td>7/20/2018</td>
<td>Case Management Services</td>
<td>John Smith</td>
<td>1710</td>
<td>QRS Company</td>
<td>$150.00</td>
<td></td>
<td>$1,450.00</td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$530.00</td>
<td></td>
</tr>
<tr>
<td>Emergency Shelter</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Women &amp; Family - Operations</td>
<td>7/31/2018</td>
<td>July Utilities - Gas</td>
<td>Family Shelter XYZ</td>
<td>4444</td>
<td>DMV Gas Company</td>
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<tr>
<td>Other Shelters - Operations</td>
<td>7/31/2018</td>
<td>July Utilities - Electric</td>
<td>Emergency Shelter 123</td>
<td>8910</td>
<td>DMV Electric Company</td>
<td>$250.00</td>
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<td>$530.00</td>
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<td>Data Collection</td>
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<td>Data Collection</td>
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<td>8001</td>
<td>Company 123</td>
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<td><strong>$5,000.00</strong></td>
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*The figure listed here should correspond with the amount being requested for reimbursement.*