



**Alliance of Community
Assistance Ministries, Inc.**

Housing Stabilization Services (HSS)

Emergency Rental Assistance (ERA)

ACAM HSS Business Rules

Updated: January 2022

Published: August 2021

Contents

I. Background.....	2
II. ACAM HSS Program Summary	3
III. Sub-Awards Procedures.....	4
IV. Contracts for Services.....	7
V. Program Implementation.....	7
VI. Allowable Costs.....	8
VII. Performance Targets and Outcome Measures.....	11
VIII. Reporting Requirements.....	11
IX. Client Eligibility	11
X. Eligibility/Intake Determination Policy & Procedure.....	12
XI. Client Intake Process	12
XII. HSS Client Intake Form Checklist Sample Instructions	17
XIII. Landlord Incentive Policy	18
XIV. Client Termination Policy & Procedure	18
XV. Grievance Procedure for RFP Respondents to ACAM’s HSS Program	19
ACAM HSS Policies.....	19
I. General HSS Procurement Policies.....	19
A. Conflicts of Interest/Nepotism	19
B. Continuous Quality Improvement (CQI) for Records.....	19
C. Program Income	19
D. Record Retention.....	20
Appendices.....	21
Appendix A. TDHCA ERA HSS Eligibility Flow Chart.....	22
Appendix B. ACAM HSS Client Determination Policy & Appeal Process	23
Appendix C. ACAM HSS Landlord Incentive Policy & Agreement	25
Appendix D. ACAM HSS Client Termination Policy.....	27
Appendix E. Grievance Procedure for RFP Respondents to ACAM’s HSS Program.....	28
Appendix F. ACAM HSS Security Deposit Policy & Agreement.....	32

I. Background

The Texas Department of Housing and Community Affairs (TDHCA) Housing Stability Services Program (HSS) provides assistance to local communities and non-profits to assist eligible households to help them maintain or obtain stable housing. The program is funded by the U.S. Department of the Treasury through the Emergency Rental Assistance (ERA) program.

Even as the American economy continues its recovery from the devastating impact of the pandemic, millions of Americans face deep rental debt and fear evictions and loss of basic housing security. Countless middleclass landlords who rely on rental income to support their families have also faced deep financial distress due to the COVID-19 crisis. Nearly 7 million Americans reported being behind on rent in Spring 2021. More than 40 percent of those renters worry that they could be evicted sometime in the next two months. Almost 12 million Americans lack confidence that they can make next month's rent. Evictions can have long-lasting consequences for families—potentially disrupting school, worsening health, displacing neighborhood networks of support, and making it more difficult to find safe, affordable housing in the future. COVID-19 has exacerbated an affordable housing crisis that predated the pandemic and that has exacerbated deep disparities that threaten the strength of an economic recovery that must work for everyone.

The Biden-Harris Administration allocated an additional \$21.6 billion under the American Rescue Plan for Emergency Rental Assistance – including \$2.5 billion targeted to the highest-need areas, where job loss and high market costs have made it especially difficult for low-income renters. To meet this need, the Emergency Rental Assistance (ERA) program makes funding available to assist households that meet eligibility criteria. As a part of ERA 1 and ERA 2, a portion of each may be used specifically for housing stability services (HSS). The State of Texas utilizes the rental assistance portion of ERA funds to provide Texans with rent and other assistance through its Texas Rent Relief Program (TRR) at [texasrentrelief.com](https://www.texasrentrelief.com). ERA1 provides up to \$25 billion under the Consolidated Appropriations Act, 2021, which was enacted on December 27, 2020, and ERA2 provides up to \$21.55 billion under the American Rescue Plan Act of 2021, which was enacted on March 11, 2021. The funds are provided directly to states, U.S. territories, local governments, and Indian tribes. Grantees use the funds to provide assistance to eligible households through existing or newly created housing stability assistance programs.

Section 501(a) of Division N of the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260 (Dec. 27, 2020), the (“Act”), authorizes the U.S. Department of the Treasury (“Treasury”) to release funds to be used to provide emergency housing stability assistance. The Texas Department of Housing and Community Affairs (TDHCA) applied to Treasury on behalf of the State and was awarded \$52.9 million. Pursuant to the Federal Funding Agreement, ERA funding is for: (1) Financial assistance to eligible households (at least 90%); and (2) Housing stability services and administrative fees (not more than 10%). With the Housing Stability Services (HSS) funding two separate programs have been established by TDHCA, HSS1 and HSS2. The TDHCA HSS programs provide case management, housing navigation, employment training, mental health counseling, security deposit assistance and other housing stability services.

The Alliance of Community Assistance Ministries, Inc. (ACAM) is a nonprofit management support organization leading a coalition of 55 nonprofit and community organizations to advance community-wide solutions through collaboration to strengthen the social safety net in Harris, Fort Bend, Waller, Brazoria, Galveston, and Montgomery Counties. In 2020, ACAM deployed a new Housing Stability Plan with \$7.3M in private and public funds secured to support approximately 12,775 people with various levels of housing stability assistance including eviction prevention and rapid rehousing services. ACAM is experienced at managing public funds for maximum community benefit going back to the 2008 financial crisis, when ACAM received American Recovery and Reinvestment Act (ARRA) funds and was highlighted by HUD for best practices in preventing homelessness. The HSS program provides an additional avenue for our region's impacted families to become more housing stable.

The Alliance of Community Assistance Ministries, Inc. (ACAM) has been awarded HSS1 funding through TDHCA and is working with qualified service providers to implement allowable activities. As noted in these Business Rules, ACAM is not eligible for all activities under the HSS program and has chosen to focus on those aligned with other programs managed by ACAM. HSS funds cannot be used to pay for rent or rent arrears. Households provided with HSS1 funding must be at or below 80% Area Median Income (AMI), as defined by HUD and qualify for unemployment benefits or attest in writing that they have experienced financial hardship due directly or indirectly to the pandemic. HSS2 households must be below 80% AMI, qualify for unemployment benefits or provide documentation that they have experienced financial hardship during or due, directly or indirectly, to the pandemic.

II. ACAM HSS Program Summary

A. ACAM HSS Model

ACAM will support the deployment of the HSS program throughout our region (CoC TX-700), including Harris, Fort Bend and Montgomery Counties. The ACAM HSS programs is built on a client-centered case management/coaching approach to housing stability services. Informed by evidence-based research and experience with the target population, the ACAM HSS program employs a assets-based goal planning approach to case management and an empowerment model, which matches interventions to the level of program participants need through a standardized, streamlined process of screening, eligibility, assessment, and high-touch case management.

ACAM's HSS program has established these Business Rules and policies and procedures that describe the process from intake to exit including screening, eligibility and income determination, assessment tools, intake documentation, client determination policy, housing stability planning templates, progress reports, and output and outcome reports. The standardized intake and case files walk service providers through the process from intake to exit including required case management and accountability follow-ups. Other standardized forms include a Client Termination Policy, Landlord Incentive Policy and Agreement, and other standardized monthly reporting forms. Case managers meet each household where

they are, to screen for eligibility, collect documentation, work with clients to develop a budget, determine the current housing cost burden, create an assistance plan, and provide coaching and education to not only help the client address the immediate housing crisis, but also help the client decrease the risk of a future crises. Two individualized plans are created during this process 1) Housing Stability Plan and 2) a Rental Assistance Plan (if needed). In addition to tracking outputs listed below, ACAM’s HSS program focuses on one or more of four outcomes:

1. Improvement in relative housing destination from entry to exit (e.g., from hotel to apartment or shelter to transitional housing),
2. Increased Self Sufficiency Matrix (SSM) score in housing domain (scale from 1 to 5, 1 = in crisis, 2 = vulnerable, 3 = safe, 4 = building capacity and 5 = empowered)
3. Received rental assistance (if needed) from ERA1 and non-ERA1 HSS sources including (EFSP, ESG, TRR, Fort Bend County, Harris County, or other/private funding sources), and
4. The number and percent of goals achieved on the Housing Stability Plan.

HSS funds can be leveraged with funds from existing programs, such as the U.S. Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG) program but cannot be used as “Match” funding for ESG. When determining if HSS funding may be used as official match for another program, please seek consultation from both funding agencies.

HSS funds may not be used to provide rental assistance. The ACAM HSS program provides funding for client outreach, case management, housing services, financial assistance payments (such as deposits, applications fees, short-term hotel/motel), and other social services and financial assistance to increase housing stability. Central to the intent of ACAM’s HSS program is regional leveraging of enhanced case management capacity with other available rental assistance funding (EFSP, ESG, TRR, Fort Bend County, Harris County, or other/private funding sources). All services are provided to eligible and appropriate households free of charge with no requirements for participation in any demonstration of religion or religious activities. Additionally, there are no zip code restrictions for any services; any residents of the CoC TX-700 region can be screened for eligibility.

III. Sub-Awards Procedures

A. Sub-Awarding Requirements

ACAM is required to ensure that every sub-award to other nonprofit service providers is clearly identified as a sub-award and that the sub-awards comply with the terms and conditions of the state award. The standards of the state flow down to ACAM through its sub-grantees via sub-awards (when allowable) unless the context clearly indicates otherwise. To determine the respective duties and obligations in the sub-award context, ACAM in its role as the pass-through entity stands in the shoes of TDHCA and the sub-grantee will comply with the requirements of ACAM unless alternate text specifies requirements for a particular category of sub-grantees (e.g., nonprofit organizations). In its

role as a pass-through entity, ACAM facilitates the communications between the sub-grantees and TDHCA that are necessary for the timely evaluation of matters requiring the approval of TDHCA. Organizations sub-awarded through ACAM may not subsequently sub-award funds to other organizations.

B. Sub-Award Evaluation of Risk

Prior to making a sub-award, ACAM must review the risk posed by grant applicants. ACAM as part of its pre-award risk review may review eligibility qualifications and financial integrity information available through government repositories such as the State of Texas Vendor Performance Tracking System, System for Award Management, and Federal Awardee Performance and Integrity Information System (FAPIIS). Awards may not be made to entities that are subject to government wide suspension or debarment as indicated on the State of Texas Debarred Vendor List or System for Award Management.

The evaluation of risks posed by applicants may incorporate results of the evaluation of the applicant's eligibility or the quality of its application. If ACAM determines that a sub-award will be made, specific conditions that correspond to the degree of risk assessed may be applied to the sub-award agreement. In evaluating risks posed by applicants, ACAM may use a risk-based approach and may consider any items such as the following:

- (1) financial stability;
- (2) quality of management systems and ability to meet the management standards;
- (3) the applicant's record in managing state and Federal awards, if it is a prior recipient of state or Federal awards, including timeliness of compliance with applicable reporting requirements, conformance to the terms and conditions of previous state and Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards;
- (4) reports and findings from audits performed;
- (5) the applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on the grantee and sub-grantees;
- (6) the sub-grantee's prior experience with the same or similar sub-awards;
- (7) the results of previous audits including whether or not the sub-grantee receives a Single Audit prepared in compliance with the Uniform Guidance, and the extent to which the same or similar sub-award has been audited;
- (8) whether the sub-grantee has new personnel or new or substantially changed systems; and
- (9) the extent and results of TDHCA monitoring (e.g., if the sub-grantee also receives state awards directly from TDHCA). ACAM will consider imposing specific conditions upon a sub-grantee, if appropriate.

C. Additional specific award conditions may include the following:

- (1) based on the criteria used for the Pre-award Risk Review of Applicants section; when an applicant or sub-grantee has a history of failure to comply with the general or specific terms and conditions of a state or Federal award;

- (2) when an applicant or sub-grantee fails to meet expected performance goals as described in the sub-award; or

D. Additional award conditions may include the following:

- (1) requiring payments as reimbursements rather than advance payments;
- (2) withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
- (3) requiring additional, more detailed financial reports;
- (4) requiring additional project monitoring;
- (5) requiring the sub-grantee to obtain technical or management assistance; or
- (6) establishing additional prior approvals.
- (7) ACAM must include any additional requirements necessary for ACAM to meet its own responsibility to TDHCA including identification of any required financial and performance reports.

E. Monitoring

ACAM must monitor the activities of the sub-grantee as necessary to ensure that sub-award performance goals are achieved and the sub-award is used for authorized purposes, in compliance with state law, rules, and the terms and conditions of the sub-award. ACAM monitoring of the sub-grantee must include:

- (1) Reviewing financial and performance reports required by ACAM.
- (2) Following-up and ensuring that the sub-grantee takes timely and appropriate action on all deficiencies pertaining to the sub-award provided to the sub-grantee from ACAM detected through audits, on-site reviews, and other means.
- (3) Issuing a management decision for audit findings pertaining to the sub-award provided to the sub-grantee from ACAM as required.

Depending upon ACAM's assessment of risk posed by the sub-grantee as described in the Evaluation of Sub-grantee's Risk of Noncompliance section, the following monitoring tools may be useful for ACAM to ensure proper accountability and compliance with program requirements and achievement of performance goals:

- (1) providing sub-grantees with training and technical assistance on program-related matters;
- (2) performing on-site reviews of the sub-grantee's program operations; and
- (3) arranging for audit services.

ACAM must verify that every sub-grantee is audited as required by TDHCA when it is expected that the sub-grantee's state awards expended during the respective fiscal year equaled or exceeded the threshold set forth in the Audit Requirements section. Further, ACAM must consider whether the results of the sub-grantee's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to ACAM's own records. ACAM must consider taking enforcement action against noncompliant sub-grantees.

IV. Contracts for Services

ACAM may issue competitive Requests for Proposals (RFP) for the procurement of HSS services. RFPs may cover one or more aspects of the provision of services under the HSS Program and will be subject to the following requirements:

- 1) Requests for proposals will be publicized and identify the evaluation factors and their relative importance.
- 2) Response adhering to guidelines of an RFP will be evaluated. Every effort will be made to solicit proposal from an adequate number of qualified sources.
- 3) ACAM will utilize its written method for conducting technical evaluations of the proposals received and for selecting contractors.
- 4) A contract will be awarded to the responsible organization whose proposal is most advantageous to the program, with price and other factors considered.

ACAM's HSS program has a process and design for management, distribution, and performance of HSS sub-contractors. By formalizing the process, the HSS program ensures that eligible households seeking assistance are able to receive the same quality and level of assistance across ACAM's HSS program. This also ensures the most efficient use of funding and resources that allow the program to reach households within our community with the highest need. The program is designed to ensure housing stability for eligible households that can demonstrate the need for assistance.

Contractors are procured and approved by a selection committee. Contractors are selected based on criteria outlined in these rules and the RFP. There may be an option for contract extension and/or renewal based on performance toward outcomes and overall contract performance. Contractors may not further sub-contract for the same services with awarded funds and must directly provide all services proposed unless otherwise indicated in the vendor contract.

HSS contractors are selected on their ability to adhere to program procedures and meet the expectations of the program as outlined in these business rules and the issued RFP. Contractors must also ensure compliance with the written guidance for the HSS program.

Overall project management for the HSS program is conducted by ACAM. ACAM staff are assigned to the program to ensure the program is on track to achieve its goals as outlined. The project manager also serves as the point person for the program and manages any communication or process concerns identified and is responsible for troubleshooting.

V. Program Implementation

ACAM's HSS client-centered case management program includes:

- A. Assessing eligibility and conducting intake in accordance with ACAM procedures.
- B. Creating Housing Stabilization Plans (HSP) with clients enrolled in the program.
- C. Creating a Rent Assistance Plan and facilitating applications for rental assistance (EFSP, ESG, TRR, Fort Bend County, Harris County, or other/private funding sources).
- D. Providing financial assistance on behalf of clients within eligible spending categories.
- E. Coordinating information and referrals for clients needing services in the community.
- F. Conducting client meetings in-person, over the phone or virtually, with frequent accountability/client follow-up.

- G. Recording individual and household program data.
- H. Producing accurate and complete case management records.
- I. Providing Continuous Quality Improvement (CQI) of records.
- J. Providing guidelines on case management and a Standardized Case Management Record.
- K. Providing updates and trainings as they become available with guidance from TDHCA and the U.S. Department of the Treasury.

VI. Allowable Costs

Funds can be used to enable eligible households impacted by the pandemic (below 80% of Area Median Income, see question on household eligibility below) to maintain or obtain stable housing. All assistance funds must be for services and must be tied to specific households.

The ACAM HSS funding does not include all services listed under the HSS program, and not all housing stability services are allowable. The following is a list of housing stability services for which ACAM has authorization to incur expenses.

Case management is a core service component and required by HSS program in accordance with the ACAM Business Rules and HSS Program Guidelines. Case management services related to housing stability that will be provided at the above service sites include:

- A. assessing eligibility in accordance with ACAM procedures and the HSS Household Eligibility and Certification Flowchart,
- B. creating Housing Stabilization Plans (HSP) and Rental Assistance Plans with clients enrolled in the program,
- C. providing financial assistance on behalf of clients within eligible spending categories,
- D. nurturing cooperative landlord relationships,
- E. coordinating information and referrals to clients for needed services in the community,
- F. conducting client meetings in-person, over the phone or virtually including follow-up and referral services,
- G. recording individual and household data,
- H. producing accurate and complete case management records,
- I. assisting clients, including landlords and tenants, with rent relief program application processes (EFSP, ESG, TRR, Fort Bend County, Harris County, or other/private funding),
- J. assistance in qualifying for unemployment or other benefits (e.g., SNAP, SSI, SSDI, Veteran's assistance, and Medicaid) and financial coaching and household budgeting programs that help stabilize the household.

Housing services include:

- A. payment for the rental of moving vans
- B. hiring of movers within reasonable limits to place households in stable housing

Housing payments will be provided to clients that have a clear plan for obtaining permanent housing. These include:

- A. rental application fees,
- B. rent or utility deposits (including pet deposits) – see **Appendix F** Security Deposit Policy & Agreement),

- C. landlord incentive payments (may not exceed one month’s rent; rent or other monthly payments are not eligible expenses - see ACAM’s HSS Landlord Incentive Policy & Agreement in **Appendix C**); and
- D. short-term payments for hotels/motels.

Eviction prevention and eviction diversion activities include:

- A. paying for legal services or attorney’s fees related to eviction appeal bonds
- B. paying for legal services related to eviction proceedings and mediation or alternative dispute resolution between landlords and tenants.

Social services for housing stability include:

- A. employment services,
- B. job training,
- C. job placement,
- D. financial literacy assistance,
- E. classes, trainings, counseling, and work-support programs that help households obtain needed skills and resources (excluding tuition) (payment for non-postsecondary credit earning certificate programs under review),
- F. childcare while searching for a job,
- G. ID recovery,
- H. transportation (i.e., bus/cab fare or IRS mileage for a service provider to take a household to view an available unit or access other social services),
- I. mental health counseling and associated medical services and substance use treatment,
- J. technology costs limited to a housing stability needs (training program, broadband/ computer to search for employment or communicate with a remote medical provider, and
- K. assistance with correcting eviction, debt, or other inaccurate data from credit report (excluding payment of debt).

Allowable Program Cost	Not Allowable Program Cost
Client-facing housing stability program staff, case workers, housing navigators providing case management activities that directly support housing stabilization and can be tied to an individual (eligible) household.	Administrative staff, program managers without client interaction, kitchen staff, janitorial staff (admin). Shelter services including food, or basic needs items.
Payment for the rental of moving vans or the hiring of movers within reasonable limits to place households in stable housing.	Furniture (under review), appliances, or home furnishings

Rental deposits, pet deposits, utility deposits, rental application fees, and landlord incentives. Subject to terms and conditions - see Landlord Incentive Policy (Appendix C) and Security Deposit Policy (Appendix F).	General/ongoing rental assistance or utility assistance. Clients should be referred to EFSP, ESG, TRR, Fort Bend County, Harris County, or other/private funding sources for this assistance.
Attorney's fees related to eviction appeal bonds, eviction proceedings and mediation. (Unless provided on-site, procurement is required).	Legal fees not associated with eviction prevention.
Career coaching, resume building, job searching, childcare, ID recovery, credit report repair.	GED classes (under review) or other tuition, ongoing childcare expenses, and services not related to housing stability (payment for non-postsecondary credit earning certificate programs under review).
Transportation for clients or staff to provide services directly related to housing stability including cab fare, gas reimbursement, Uber, Lyft	Vehicle purchase, vehicle repair, travel expenses not related to housing stability services
Mental health counseling and associated medical services and substance use treatment, including but not limited access to a mental health practitioner for medication management for persons with disabilities, as required to obtain or maintain housing. (Unless provided on-site, procurement is required).	Prescriptions, medical equipment, medical expenses
Purchase of a computer or broadband assistance to help a program participant attend an HSS training program, search for employment, or communicate with a remote medical provider, as required to obtain, or maintain housing	Computers, broadband internet, or phone service for general program use and/or administration (admin) costs are not allowed. Within the allowable activity noted, no individual purchase of equipment of \$5,000 or more is allowed.

NOTE: Households may receive housing stability assistance for up to 12 months from HSS1 and up to 15 months from HSS2. The aggregate amount of financial assistance an eligible household may receive under HSS2, when combined with financial assistance under HSS1, must not exceed 10 months.

NOTE: Any cost that cannot be specifically tied to direct assistance to an eligible household is an ineligible expense. Assistance funds must be for services and must be tied to specific

households. A good way to apply a test for this is to ask yourself which households are the specific beneficiaries that I can report on for this activity. If the funds can't be tied to households, then it likely is not eligible. If unsure, contact us.

VII. Performance Targets and Outcome Measures

ACAM maintains data for the HSS program which may include:

- A. Number of people and households screened for program eligibility,
- B. Number of people and households determined eligible for the program,
- C. Number of people and households enrolled in HSS (clients met eligibility: COVID-19 impacted, housing unstable, and < 80% AMI),
- D. Demographics,
- E. Special Populations,
- F. Household data,
- G. Housing status (destination) at entry and exit,
- H. Fair Market Rent and Housing Cost Burden calculations,
- I. Household Income,
- J. Documentation of pandemic impact,
- K. Non-cash benefits received by household,
- L. Housing Stability Plan and Rent Assistance Plan,
- M. Barriers to Stable Housing,
- N. Assessment of Housing Stability,
- O. Sessions of case management, coaching, and employment counseling provided per person per household,
- P. Number of people and households assisted with applications for rent assistance (and which programs),
- Q. Number of people and households successfully enrolled in rental assistance (including amount and which programs),
- R. Amount of housing services provided per service, per household (i.e., utility deposits, pet deposits, landlord incentives, moving costs), and
- S. Amount of social services provided per service, per household (transportation, childcare, employment training programs, ID recovery, technology, credit recovery related to stability).

VIII. Reporting Requirements

ACAM has established reporting requirements for sub-awardees and contractors. Additional information is provided to awarded sub-grantees or contractors. In general, monthly invoices must be accompanied by the monthly performance and expenditure reports which are due via electronic submission. Failure to submit any report or monitoring response required by the sub-award or contract may result in suspension of payments or termination of agreements. ACAM may include other requirements as indicated in issued sub-awards or contracts. Reports will be subject to the terms outlined in sub-award or contract service agreement.

IX. Client Eligibility

HSS program funds may be used to provide certain types of financial assistance and housing stability services to eligible households. To be eligible, a household must have experienced

financial hardship during or due (defined differently for HHS1 and HSS2), directly or indirectly, to the coronavirus pandemic and the service provider must determine:

- A. household income (HSS1 at or below, HSS2 below) 80% of area median income (AMI),
- B. one or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due, directly or indirectly, to the COVID-19 pandemic;
AND
- C. one or more individuals within the household can attest to being at-risk of homelessness documented by a past due utility or rent notice or eviction notice, OR without assistance they will have to move to an unsafe or unhealthy living conditions.
- D. Households must certify that they are not receiving TDHCA HSS services from another program intended for the same purpose that might produce a duplication of benefits.
- E. Households may receive housing stability assistance for up to 12 months from HSS1 and up to 15 months from HSS2. The aggregate amount of financial assistance an eligible household may receive under HSS2, when combined with financial assistance under HSS1, must not exceed 10 months.

X. Eligibility/Intake Determination Policy & Procedure

Every household's eligibility and appropriateness for the program is determined in accordance with ACAM's procedures and all applicable policies. All households that are declined enrollment by a Housing Stability Services Provider have the right to appeal the eligibility determination. ACAM follows the TDHCA ERA HSS Eligibility Flow Chart in **Appendix A**. Service providers shall provide information and assistance with the appeal process. If a household wishes to appeal the intake determination of the Housing Stability Services provider, the head of household shall be instructed to follow the process described the Client Determination Policy & Appeal Process in **Appendix B**.

XI. Client Intake Process

ACAM follows the TDHCA eligibility process described in the TDHCA ERA HSS Eligibility Flow Chart in **Appendix A**. The guidelines include:

1. Eligibility Requirements
2. Self-Attestation for Income Determination
3. Duplication of Benefits
4. Allowable Program Costs

And Household Eligibility Requirements including, but not limited to:

1. Financial Hardship
2. Housing Instability (if sued for eviction - document docket number, JP number, and county of the court)
3. Income Eligibility <80% AMI
4. Income Verification
5. Attestation of non-duplication of benefits

For the HSS program, there are four ways to document household income (must re-verify if reapply):

- Option 1. Eligibility through Other Programs (re-certification needed in 12 months)
- Option 2. Annual Income Documentation for 2021 (prior year) (re-certification needed in 12 months)
- Option 3. Monthly Income Documentation – annualized based on the last 30 days (re-certification needed in 12 months)
- Option 4. Self-attestation of income (re-certification needed in **3 months**)

A. Option 1: Eligibility through Other Programs (Categorical Eligibility)

- a. A Household with six (6) or fewer members may provide a letter or other documentation dated on or after January 1, 2020, showing that the Household receives benefits from one of the following programs:
 - i. Head Start
 - ii. Low Income Home Energy Assistance Program (“LIHEAP”), or the Comprehensive Energy Assistance Program (“CEAP”) in Texas
 - iii. Supplemental Nutrition Assistance Program (“SNAP”)
 - iv. Supplemental Security Income (“SSI”), for head or co-head of Household
 - v. Temporary Assistance for Needy Families (“TANF”) or Tribal TANF, for head or co-head of Household
 - vi. Veterans Affairs Disability Pension, Survivor Pension, Enhanced Survivor Benefits, or Section 306 disability pension (not standard VA pension)
 - vii. Special Supplemental Nutrition Program for Women, Infants, and Children (“WIC”) for Households with three or fewer member
- b. If the Household resides in a development that is a property whose rent limit is capped by HUD, the U.S. Department of Agriculture, or the TDHCA, the Household may provide documentation that an income certification was done pursuant to 24 CFR Part 5 on or after April 1, 2020, but must be within twelve (12) months of the application for assistance for household Stability Services or Other Financial Assistance, showing the residing Household’s income did not exceed eighty percent (80%) of HUD’s AMI.
- c. If a Household has any of the items above, they must also sign a certification that is part of the application attesting to their Household annual income.

B. Option 2: IRS Annual Income

- a. Filed 2020 or 2021 if after April 2022 IRS Form 1040 if the Household has completed their 2020 or 2021 if after April 2022 federal income taxes. Household income will be calculated as the adjusted gross income.
- b. An official IRS Tax Return Transcript will suffice for a 2020 or 2021 if after April 2022.
- c. Source documents evidencing annual income (e.g. wage statement, W2s, interest statement, unemployment compensation statement).
- d. All file types (PDF, screenshot, picture, etc.) are acceptable.

C. Option 3: Household’s Monthly Income

- a. Income reported for thirty (30) days will be annualized based upon the provided 30-day documentation. Except as documented below, the documentation should be no more the ninety (90) days old.
 - i. Alimony
 - ii. Cash Income (certification)
 - iii. Gross Pay at time of application: Pay stubs covering the most recent thirty (30) day-period or current letter from employer verifying gross wages (pay rate, hours/week, pay date)
 - iv. Current Pension/Retirement Benefit letter (if applicable)
 - v. Investment income
 - vi. No Income (certification)
 - vii. Pension
 - viii. Retirement
 - ix. Self-Employment (certification)
 - x. Social Security
 - xi. Unemployment compensation
- b. Excluded Income for Option 3. The following are excluded Income for purposes of program eligibility:
 - i. Income from Children, which is income from the employment of children (including foster children) under the age of eighteen (18) years and child support.
 - ii. Payments Received for the Care of Foster Children, including foster adults (usually persons with disabilities, unrelated to the family, who are unable to live alone).
 - iii. Lump-Sum Payments, including additions to family assets, such as inheritances, insurance payments (e.g., health and accident insurance, and worker's compensation), capital gains and settlement for personal or property losses [except as provided].
 - iv. Reimbursement for Medical Costs, including all payments received by the family that are specifically for, or in reimbursement of, medical expenses for any family member.
 - v. Live-in Aide, including the income of a live-in aide employed because of a medical condition or disability of a family member. A live-in aide is determined to be essential to the care and well-being of the person, not obligated for the support of the person, and would not be living in the unit except to provide the necessary supportive services.
 - vi. Education Assistance, including the full amount of educational scholarships paid directly to the student or to the educational institution, and Government funds paid to a veteran for tuition fees, books, equipment, materials, supplies, transportation, and miscellaneous personal expenses of the student. Any amount of such scholarship or payment to a veteran not used for the above purposes that is available for subsistence is to be included in income.
 - vii. Government Programs, including the following: Amounts received under training programs funded by HUD and earnings and benefits from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government.) Amounts received by a disabled person that are disregarded for a limited

- time for purposes of SSI eligibility and benefits, because they are set aside for use under a Plan to Attain Self-Sufficiency (“PASS”). Amounts received by a participant in other publicly assisted programs, which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and made solely to allow participation in a specific program. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the U.S. Housing Act of 1937. Amounts paid by a State agency to a family with a member who has developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member living at home.
- viii. Temporary Income, considered temporary, nonrecurring, or sporadic in nature (including gifts).
 - ix. Income of Full-Time Students, earnings in excess of \$480.00 for each full-time student eighteen (18) years old or older attending school or vocational training (excluding the head of Household and spouse).
 - x. Property Tax Refunds, including amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling of the unit.
 - xi. Adoption Assistance Payments, more than \$480.00 per adopted child.
 - xii. Income from Stimulus checks, that is income from any of the stimulus checks received during the pandemic.

D. Option 4. Income Determination: Self-Attestation (Must recertify after 90 days)

Households who are not otherwise exempt from providing income documentation may provide a written attestation to their income and income eligibility if the household has insufficient income documentation or no income documentation available. A caseworker, housing navigator, or other housing stability service professional may then certify, in writing, that they reasonably believe that the household meets the applicable income requirements. The service provider must retain documentation on the certified self-attestation (ACAM form provided) and record why they believe the household to be eligible. The self-attestation is only valid for three months after its issuance. If the household wishes to access services after three months have passed, they must either complete a provider certified re-attestation of their income eligibility or provide proper income documentation.

- a. Written provider certified self-attestation of household income without further verification as to household income is sufficient for determining income eligibility for Housing Stability Services for 90 days.
- b. Self-attestation from a household must specify the monthly or annual income claimed by the household and be certified by a caseworker, housing navigator, or other housing stability service professional.
- c. In appropriate cases, providers may rely on a written attestation directly from a housing stability service professional with knowledge of a household’s circumstances to certify that an applicant’s household income qualifies for assistance.
- d. Households may need to provide income documentation upon request.

E. Other Income Inclusions/Exclusions

- a. To determine whether a household qualifies for the program they must have gross annual income at or below 80% of the Area Median Income (AMI). Providers can use the following link to determine the AMI limits for the county services are provided in.
2021AMI – Effective June 1, 2021
https://www.huduser.gov/portal/datasets/il.html#2021_query
- b. Child Support. Paying or receiving child support does not determine whether a Household can qualify. Child support payments received are excluded when counting income. Child support payments paid have no effect on eligibility or income calculation.
- c. Recent Loss of Income. If a Household's annual income from their 2020 W-2 forms exceeds eighty percent (80%) AMI, but the Household has experienced a more recent loss of income, they may still meet the income test if their income documentation submitted for the last 30 days shows an income below eighty percent (80%) AMI.
- d. Changes in Income. If an applicant submits income information when they first apply, and then submits different/additional income information that is more current prior to receiving assistance, then income determination must be based on the most recent income documentation provided.
- e. Unemployment Insurance. For Unemployment Insurance ("UI"), the annual income determination will be calculated by multiplying the "Weekly Benefit Amount" in the Statement of Benefits letter by fifty-two (52), not actual payments made. Pandemic Unemployment Assistance ("PUA") or any other unemployment compensation received in addition to this weekly benefit will not be included in income calculations for TRRP. Unemployment benefits may be from another state for purposes of documenting income, however the unit assisted must be their current primary residence and be located in Texas.

F. Determining Household Size

When determining the number of household members and annual household income:

- a. Minor children are considered household members. Earned income of minor children is not considered as part of total annual household income.
- b. Minor children who are subject to shared custody agreements may be counted as household members if the minor child lives in the residence at least 50% of the time.
- c. Temporarily absent family members are considered household members and their income is considered in calculation of household income, regardless of how much the temporarily absent family member contributes to the household.
- d. Paid, non-related, live-in aides, whether paid by the family or through a social service program, are not considered household members. Income of live-in aides is not considered in the calculation of household income. Related persons do not qualify as live-in aides.
- e. Permanently absent family members, such as a spouse who resides permanently in a nursing home, may be considered a household member, at the discretion of the head of household/program applicant. If the head of household opts to include a permanently absent family member in the household, the income of the permanently absent household member

will be counted in the calculation of annual household income. If the head of household chooses not to include the permanently absent family member as part of the household, the income of the permanently absent family member will not be considered in the calculation of annual household income.

XII. HSS Client Intake Form Checklist Sample Instructions

ACAM utilizes the TDHCA HSS client intake checklist which includes the following data

- a. Applicant Name: Collect name of applicant applying for services for his or her household. Names and other personal identifiable information will not be reported to TDHCA on a monthly basis.
- b. Unique Identifier: Determine a unique household ID for the household served. This unique ID should be tied directly to an application, including applicant name and eligibility documentation, in your organization's records. Unique IDs are reported to TDHCA on a monthly basis, along with general household information, income and eligibility information, and household demographics.
- c. County/Zip Code: Collect the county and zip code where the household currently resides. If the household currently has no permanent residence, please input either a future residence or the county and zip code where service was provided.
- d. Non-Duplication Certification: Clients must certify that they have not received funds or services from Texas Department of Housing and Community Affairs (TDHCA) Emergency Rental Assistance Housing Stability Services Program for the same purpose and same period of time that might produce a duplication of benefits. Please note that receiving rental assistance from other programs or receiving different stability services is allowable.
- e. Acknowledgement of Housing Instability: Clients must certify that they are at risk of housing instability, are currently experiencing homelessness, or is survivor of domestic violence fleeing from abuse.
- f. Acknowledgment of Being Financially Impacted by the Pandemic: Clients must certify that due to or during the pandemic they have been financially impacted (have experienced a reduction in income, have incurred significant costs, or have experienced other financial hardship).
- g. Self-Attestation of Income Eligibility: Clients must report and certify their household income. Self-attestation from a household must be certified by a caseworker, housing navigator, or other housing stability service professional. In appropriate cases, providers may rely on an attestation from a caseworker, housing navigator, or other housing stability service professional with knowledge of a household's circumstances to certify that an applicant's household income qualifies for assistance. Households may need to provide income documentation upon request.
- h. Household and Income Information:
 - i. Are there Children in the Household under age 18? Yes/No
 - ii. Are there Adult(s) in the Household over age 62? Yes/No
 - iii. Is anyone in the household a person with a disability? Yes/No

- iv. Is anyone in the household a veteran? Yes/No
- v. Gender of Applicant: Male, Female, Nonbinary, Declined to Answer
- vi. Self-identified Race of household: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, Multi-Racial/Other, Decline to Answer
- vii. Self-identified Ethnicity of household: Hispanic or Latino, Not Hispanic or Latino, Declined to Answer
- i. First-time recipient of HSS Services: Yes/No
- j. Gross Monthly Income: Enter the household's annual gross income in USD (\$). Use either self-reported income or documented income as applicable. If the household has no income, enter \$0.
- k. Household Size: 1-8 Enter the number of persons in the household seeking assistance. A household is defined as any group of people that present together for assistance and identify themselves as a family or household, regardless of age or relationship or other factors.
- l. Area Median Family Income (AMI): Calculate the household's AMI qualification using their self-reported income or other income documentation if requested, the household size, and AMI levels for your area. Confirm reported income against the applicable 80% income limit as listed here:
<https://www.huduser.gov/portal/datasets/il.html> and document it on the applicant's case file. Report the household's income as 80%-51%, 50%-31%, or 30%-0%. Note that if the income exceeds 80% AMI, they are not eligible for assistance.
- m. Does the client need to provide documentation of income to confirm attestation? Determine whether client needs to provide documentation to confirm attestation or is self-attestation is sufficient to receive HSS funded services. The Housing Professional may affirm self-attestation through knowledge of client's income eligibility, through knowledge of homelessness, or through another method. A client should provide documentation of income to confirm attestation if the Housing Professional does not have knowledge of a households' circumstances. See the TDHCA Client Eligibility Flowchart in **Appendix A** for more detail.

XIII. Landlord Incentive Policy

The ACAM Housing Stability Services (HSS) Program allows for landlord incentive payments. The purpose of this policy is to define eligible incentives, the documentation process, and limits. Selected service providers will receive a copy of this policy and landlord incentive agreement to document expenses as part of their sub-award or contract. See **Appendix C** for ACAM's HSS Landlord Incentive Policy & Agreement.

XIV. Client Termination Policy & Procedure

Cause for termination or suspension includes failure to comply with terms of the program, failure to abide by the requirements of the service provider and/or the identification of possible instances of fraud, abuse, waste, fiscal mismanagement, or other deficiencies. Provisions for termination is clearly stated in the signed Program Agreement completed upon initial assessment. Termination

from the HSS program may not necessarily prevent the provider from provision of future assistance to the client. See **Appendix D** ACAM HSS Client Termination Policy for more detail.

XV. Grievance Procedure for RFP Respondents to ACAM's HSS Program

The purpose of the grievance procedure is to settle any grievance between an RFP respondent and Alliance of Community Assistance Ministries, Inc. (ACAM), as quickly as possible to assure an efficient and fair procurement. See Grievance Procedure for RFP Respondents to ACAM's HSS Program in **Appendix E**.

ACAM HSS Policies

I. General HSS Procurement Policies

In accordance with ACAM's Procurement Policy, an outside consultant or contractor is prohibited from submitting a competitive proposal for services in which the consultant or contractor was a designer or reviewer. Applicants may be required to submit a disclosure of the nature of any perceived or actual conflicts of interest as part of the proposal or contract. Submitting a disclosure does not disqualify the applicant from consideration; however, ACAM may request a conflict of interest mitigation plan upon review of the application. ACAM also maintains a competitive procurement process including a Grievance Procedure for RFP Respondents to ACAM's HSS Program provided in **Appendix E**.

A. Conflicts of Interest/Nepotism

- a. HSS assistance will not be contingent on the client's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
- b. No provider, with respect to client's occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation or administer homelessness prevention.
- c. When procuring goods and services, the provider will comply with codes of conduct and conflicts of interest requirements as well as the Texas Administrative Code.

B. Continuous Quality Improvement (CQI) for Records

- a. ACAM shall host regular CQI meetings.
- b. Each service provider will bring a designated number of records and have other service provider agencies review the other service providers' records.
- c. The CQI Form shall be updated and deficiencies corrected when possible.

C. Program Income

Program income includes any gross income received by the ACAM or service provider.

ACAM or service provider that was directly generated by a grant supported activity or earned only as a result of the contract during the grant period.

- a. Fees charged to a household by a service provider to provide HSS services are prohibited.

- b. Any repayment of direct assistance to the service provider by the client becomes program income.
- c. Program income that is received after the end of the program period must be returned to ACAM as it must be returned to TDHCA.
- d. Utility and pet deposits paid on behalf of a household should be treated as a grant to the household. Rent deposits may only be returned to the household if the household remains in the unit for four or more months. Otherwise, the rent deposits should be returned to the issuing agency. If the deposit is returned to the service provider, it is program income, and may be spent on other HSS qualifying activities.
- e. Program income shall be reported by the service provider to ACAM monthly.

D. Record Retention

Maintain records in accessible location for five (5) years after expenditure of all funds from the current contracted program year. The service provider agrees to house the records for the required retention period. Service providers shall produce records for review by ACAM as needed, and will comply with requests and records reviews from ACAM, TDHCA, Treasury and its representatives as requested.

Appendices

[Appendix A. TDHCA ERA HSS Eligibility Flow Chart](#)

[Appendix B. ACAM HSS Client Determination Policy & Appeal Process](#)

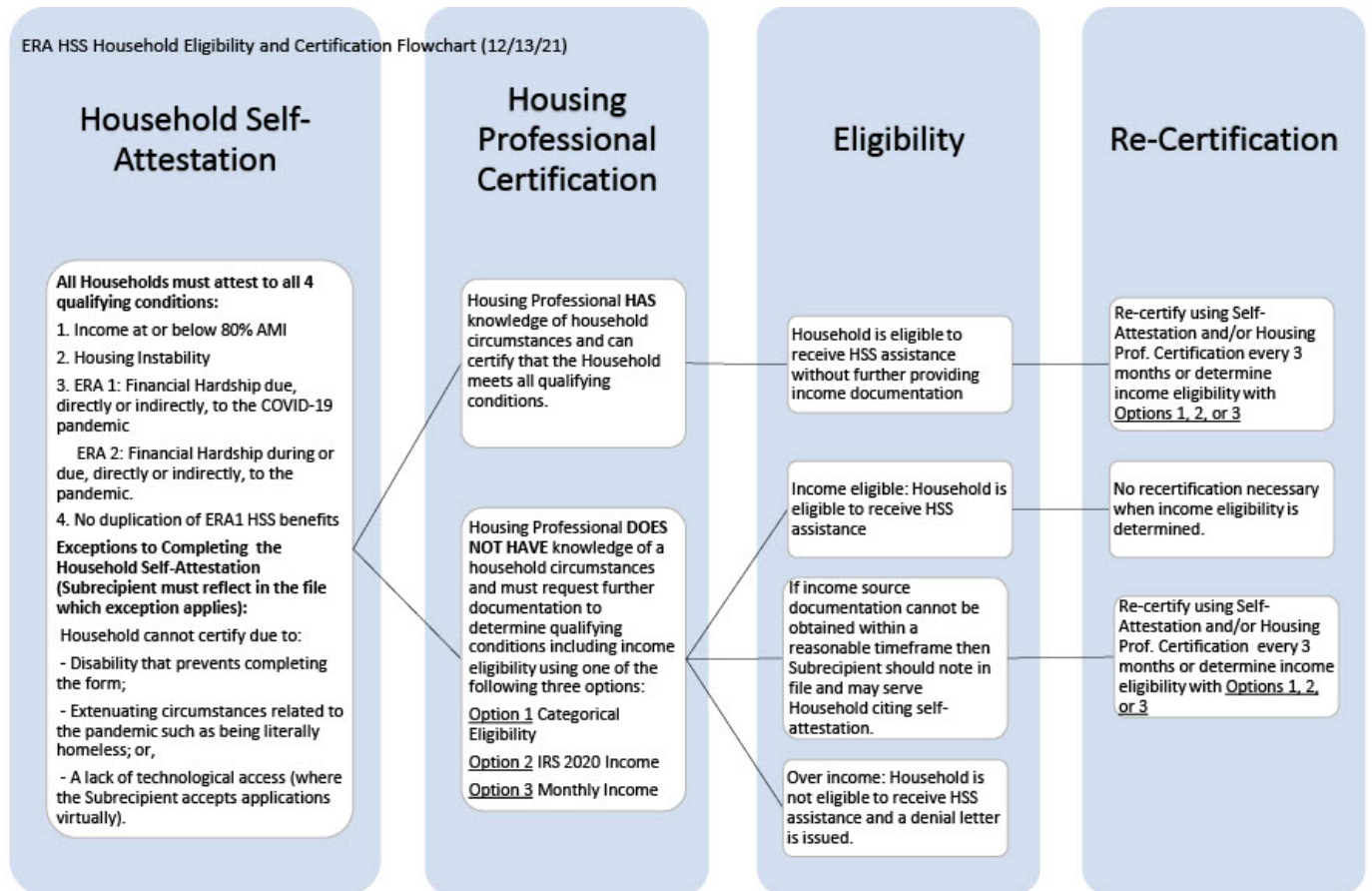
[Appendix C. ACAM HSS Landlord Incentive Policy](#)

[Appendix D. ACAM HSS Client Termination Policy](#)

[Appendix E. Grievance Procedure for RFP Respondents to ACAM's HSS Program](#)

[Appendix F. Security Deposit Policy & Agreement](#)

Appendix A. TDHCA ERA HSS Eligibility Flow Chart



Appendix B. ACAM HSS Client Determination Policy & Appeal Process

Client Determination Policy

All households that are declined enrollment by a Housing Stability Services Provider have the right to appeal the program entrance determination. Case Managers/Counselors and Coaches shall provide information and assistance with the appeal process outlined below. If a client wishes to appeal the intake determination of the Housing Stability Services provider organization, clients shall be instructed to follow the process described in this procedure.

You can appeal when you believe there is an error with:

- A denial or ineligibility determination,
- Any other program determination.
 - Appeals that challenge federal program requirements will be denied.

You can appeal within 30 days of determination:

- An applicant must submit a completed Appeal Form and any supporting documentation directly to the program within thirty (30) days of the original determination.
- Appeals received after the 30-day window will be denied. If you do not submit an appeal within 30 days, the program will assume you have accepted the program determination.

Make sure to submit the following with your Appeal:

- Additional facts, circumstances, or evidence to justify your Appeal.
- For documentation to be considered, it must be submitted with your Appeal Form.

What will be accepted?

- The program may accept or reject new documentation based upon its accuracy and relevance to the appeal.

What you can expect:

- The Program will review and address the Appeal within fifteen (15) business days of its receipt, when feasible.
- You will receive written notification of the Program's determination via email or mail.

Appeal determination.

- Missing/ corrected documentation may be accepted at Second Appeal, if submitted timely and appropriately.
- Appeals may be denied or approved in whole or in part after a thorough review of the determination, the information already included in an Applicant's file, and relevant new documentation submitted.

To file an Appeal

- Complete the following completed form, along with all supporting documents.
- Please note: Appeals submitted by mail must be postmarked or emailed within the thirty (30) days of the initial application determination.

ACAM HSS Client Determination Appeal Form

Please include any supporting documentation for the appeal with submission of this form.

Provider Organization:	
Date:	
Full Name:	
Address Line 1:	
Address Line 2:	

Select one of the following options for which you are requesting appeal:

Eligibility Determination

Other: _____

Provide an explanation of the basis for the appeal:

Signature: _____ Date: _____

Appendix C. ACAM HSS Landlord Incentive Policy & Agreement

ACAM HSS Landlord Incentive Policy

ACAM Housing Stability Services (HSS) Program allows for landlord incentive payments. The purpose of this policy is to define eligible incentives, the documentation process, and limits.

A. Landlord Incentive Payments Defined

Landlord incentive payments and risk fees are payments that improve the likelihood that a client can find and secure housing. Landlord incentives do this by negotiating additional payments to landlords so that the landlord in question will agree to rent to households facing barriers to housing (e.g., households with criminal backgrounds, poor credit, debt or poor rental history). Landlord incentives can be retained by the landlord at the end of the lease term provided that the landlord meets the terms of the landlord incentive agreement. For the purposes of the housing stability services program, landlord incentives do not include additional months, rent, arrearage, security deposits, application fees, or any fees normally charged to all tenants.

B. Case Management Process

Case managers will work with clients and landlords to determine if a landlord incentive would assist the client in becoming housing stable. Landlord incentive payments must not exceed one month's rent in value and the lease must be at least six months long. The landlord incentive payment must be documented in the case file along with a copy of the lease agreement. The Landlord Incentive Agreement below includes the incentive amounts, signatures of landlord, adult tenants, and case manager. Once the Agreement has been signed by all parties (tenant, landlord, and service provider), the form must be kept in the client's file in Tab 3 as part of the required documentation supporting the housing services payment.

C. Types of Landlord Incentive Payments

Risk fees are fees that landlords automatically apply during lease signing before they agree to lease to a client with a criminal background, eviction history, poor credit, debt, or poor rental history. Unlike a landlord incentive payment, risk fees do not require negotiation or outreach on the part of an external party, such as ACAM service providers. These fees are allowable provided that the fee is customary, automatic, and based on defined rental screening criteria. Signing Bonuses may be used for initial lease execution or lease renewal within the last sixty days of the lease term. If at any time ACAM service providers attempt to negotiate to pay an additional fee or the landlord attempts to engage ACAM service providers to either raise, institute, or levy an additional fee, then this fee will be subject to the landlord incentive policies outlined above. Risk fees require at least a six-month lease and are limited to one month's rent. If a risk fee and a signing bonus are provided, the sum of these two payments cannot be more than one month's rent.

ACAM HSS Landlord Incentive Agreement

1. The tenant, landlord, and service provider should complete this agreement.

Service Provider:	
Case Manager:	
Date:	
Tenant Name:	
Second Adult Tenant Name:	
Tenant Full Address:	
Landlord Name:	
Landlord Full Address:	
Landlord Phone:	

Please give the reason why an incentive payment is needed. Check one or more:

- Previous eviction
 Missed/late rent payments
 Criminal background
 Previous broken lease
 Low credit score/debt
 Other rental history (e.g., property damages) explain: _____
 Other – explain: _____

2. The service provider should indicate the amount and type of landlord incentive below. To qualify for an incentive payment, the lease must be at least six months long. ***The total incentives cannot be more than one month's rent.***

Landlord Incentive Type	Description	Amount
Risk Fee	A risk mitigation fee is a fee paid by a rental applicant to the landlord as a requirement for conditional approval for tenancy.	
Signing Bonus	A financial reward to the landlord for joining a program, keeping a tenant, or adding a high-risk tenant to a unit.	
	Total Incentive Payment	
	Total One Month's Rent	
	Initial here to verify total incentive payment does not exceed one month's rent	

I/we understand that with my/our signature I/we are certifying all information herein is true and correct.

Signature of Tenant: _____ Date: _____

Signature of Tenant: _____ Date: _____

Signature of Landlord/Landlord's Agent: _____ Date: _____

Signature of ERA-HSS Case Manager: _____ Date: _____

Appendix D. ACAM HSS Client Termination Policy

ACAM HSS Client Termination Policy

Cause for termination or suspension includes failure to comply with terms of the Program Agreement, failure to abide by the requirements of the agency and/or the identification of possible instances of fraud, abuse, waste, fiscal mismanagement, or other deficiencies. Provisions for termination is clearly stated in the signed Program Agreement completed upon initial assessment. Termination from the HSS program may not necessarily prevent the provider from provision of future assistance to the client.

Termination Procedure: First, the Case Manager sends a warning letter by certified mail that clearly states the reason for which the client is in noncompliance and in danger of being exited from the HSS program; if clients are encouraged to contact the Case Manager to discuss options for becoming compliant; and the time period in which this must be completed. If after the specified time the client is still noncompliant, the Case Manager shall request a Case Staffing Meeting and recommend that the client be exited. If the Case Staffing group agrees, the Case Manager would send a second certified letter that clearly states the reason for which the client is in noncompliance and being exited from the HSS program; the process for filing an appeal; and the time period in which this must be completed.

Appeals Process: If a client wishes to appeal and present objections, the client must request an appeal with the Case Manager within seven (7) business days from the date of the termination letter. The Case Manager then sets up a Case Staffing Meeting. If the client does not attend the hearing or attends but fails to bring sufficient evidence of compliance or reason for non-compliance, they will then be exited from the program.

Any applicant/ client denied admission or terminated from services provided under HSS has the right to appeal the decision. All applicants/ clients who are denied admission or continuation of services will be informed at the time of the denial/termination of their right to appeal the decision. The applicant/client will be supplied with a denial/termination letter, a copy of this procedure, and a blank appeal form. Applicants/Clients wishing to appeal the decision must inform the Case Manager and complete the appeal form within seven (7) business days of the date on denial/termination letter.

The applicant/client and appropriate Contractor Program Director will arrange a mutually agreeable date and time for the applicant/client to present his/her appeal at the Case Staffing Meeting. Applicants/Clients may present an appeal in writing or orally and may choose to bring a friend or advocate to the meeting. The applicant may also present any new information relevant to the denial of application or termination for non-compliance.

The Program Director name will notify the Case Manager of his or her decision within five business days of the Case Staffing Meeting and will inform the applicant/client in writing of the final determination. Final determination will be sent to the applicant/client by certified mail, receipt requested.

Appendix E. Grievance Procedure for RFP Respondents to ACAM's HSS Program

Grievance Procedure for RFP Respondents to ACAM's HSS Program

Purpose

The purpose of the grievance procedure is to settle any grievance between an RFP respondent and Alliance of Community Assistance Ministries, Inc. (ACAM), as quickly as possible to assure an efficient and fair procurement.

Eligibility

A grievance may be filed by any proposer that claims it has been adversely affected by:

1. The score assigned by the Independent Review Team.
2. Improper application of ACAM business rules, regulations and/or procedures.

Procedure for Filing Respondent Organization Grievances

The following steps must be followed in the order given. Time limits shall begin on the first working day after the applicable occurrence, filing, appeal, response, or recommendation. Working days shall not include weekends or national holidays.

Step 1

To be considered, a grievance must be filed in writing with ACAM within 24 hours preliminary contract award announcement. This written grievance should be sent to Sarah Malcolm, Housing Stability Programs Manager at smalcolm@acamweb.org. ACAM has forty-eight (48) hours from receipt of the grievance form to respond to and resolve the grievance.

Step 2

If the respondent organization is not satisfied with the proposed resolution the respondent organization has twenty-four (24) hours to file an appeal with the ACAM Grievance Committee.

The Grievance Committee has forty-eight (48) hours to investigate, talk with the grievant and respond in writing using the official form.

General Provisions

The Grievance Forms provided by ACAM should be used in pursuing a resolution of the grievance.

The respondent organization may represent itself or be represented by a chosen representative when presenting the organization's grievance.

GRIEVANCE FORM FOR ACAM HSS PROGRAM RFP RESPONDENTS

Grievance Form

Respondent Organization: _____

Representative: _____ Title: _____

Address: _____ Phone: _____

We have discussed this complaint with Housing Stability Programs Manager and received her verbal answer on (date)_____. Because this answer is unacceptable to us, we wish to file a formal complaint.

Nature of grievance. Explain how your organization was unfairly treated including names and dates. (Use additional pages if needed.)

A just and fair solution of our grievance is:

We understand that if we wish to further appeal our complaint, we have twenty-four (24) hours from response to submit a grievance form to the next level of appeal. Grievances not appealed timely are considered settled at the previous level.

Date

Signature

GRIEVANCE PROCEDURE FOR THE ACAM HSS PROGRAM RFP RESPONDENT ORGANIZATIONS

Grievance Form Response from ACAM’s Grievance Committee

Respondent Organization: _____

Respondent Representative: _____

ACAM’s Grievance Committee Response to Respondent Organization’s Complaint:

Grievances not appealed timely are considered settled at the previous level.

Date

Signature

Appendix F. ACAM HSS Security Deposit Policy & Agreement

ACAM HSS Security/Utility/Pet Deposit and Application Fees Policy

The ACAM Housing Stability Services (HSS) Program allows for payments to landlords or utility companies for one-time financial assistance for a security deposit, utility deposit, and pet deposit payments. The purpose of this policy is to define eligible expenses, the documentation process, and limit.

1. Definitions of Eligible Expenses

- a. **Security Deposit.** Security deposits can be paid to by service providers on behalf of eligible clients to landlord, so they are willing to rent to someone with limited income, a poor rental history, or a criminal history. The funds can cover damages to the rental unit, lost rent, or legal fees. HSS clients are eligible to receive this deposit returned in full at the end of the tenancy agreement given no charges have been incurred if they have resided in the unit for at least four months. If they do not reside in the unit for at least four months, the landlord will return the security deposit to the service provider.
- b. **Utility Deposit.** A utility deposit is an up-front sum of money paid by service providers on behalf of clients to landlords that can be used to pay for utilities in the case that the tenant is unable to pay for any pending electricity, natural gas and water utility bills. HSS clients are eligible to receive this deposit returned in full at the end of the tenancy agreement given no pending payments on the utility fees if they have resided in the unit for at least four months. If they do not reside in the unit for at least four months, the landlord will return the utility deposit to the service provider.
- c. **Pet Deposit.** Pet deposits are very similar to a security deposit, but the deposit is intended only to repair damage caused by a pet. HSS clients are eligible to receive this deposit returned in full at the end of the tenancy agreement given no charges have been incurred if they have resided in the unit for at least four months. If they do not reside in the unit for at least four months, the landlord will return the pet deposit to the service provider.
- d. **Application Fees.** Payment of housing application fees, provided that these application fees are required of all tenants and are reasonable and intended to help the household maintain or obtain housing

For the purposes of the housing stability services program, security/utility/pet deposits and application fees are normally charged to all tenants and do not include additional months, rent, arrearage, or landlord incentives (see Landlord Incentives Policy).

2. **Case Management Process:** Case managers negotiate with landlords to agree on fair and reasonable deposit rates, help clients to pay the rent on time, follow the lease, care for the unit, and mediate issues with the landlord before they escalate.
3. **Required Documentation:** All service providers should document payments in the “Summary of Assistance” Worksheet and keep the Deposit Agreement, Deposit Receipt and supporting documentation of payment in the clients’ file in Tab 3.

ACAM HSS Security/Utility/Pet Deposit and Application Fee Agreement

3. The tenant, landlord, and service provider should complete this agreement.

Service Provider:	
Case Manager:	
Date:	
Tenant Name:	
Second Adult Tenant Name:	
Tenant Full Address:	
Landlord Name:	
Landlord Full Address:	
Landlord Phone:	

4. The service provider should indicate the amount and type of deposit below. *The tenant must reside in the unit for at least four months to receive the deposit back from the landlord. Otherwise, the landlord shall return the deposit to the service provider. ***The security deposit(s) cannot be more than one month's rent.***

Rental Deposit	Description	Amount
Security Deposit	Money that a renter pays to a landlord that can be used to pay for damages that is returned to the tenant if not used, and the tenant remains in the unit for at least four months.	
	Total Security Deposit	
	Total One Month's Rent	
Initial here to verify total security deposit is no more than one month's rent		

Deposit Type	Description	Amount
Utility Deposit	Up-front payment by service providers on behalf of clients to landlords that can be used to pay for utilities	
Pet Deposit	Deposit intended only to repair damage caused by a pet	
Application fees	Payment of housing application fees, provided that these application fees are reasonable	
	Total Other Deposits and Fees	

I/we understand that with my/our signature I/we are certifying all information herein is true and correct. The deposits being charged are usual and customary and charged to all applying tenants.

Signature of Tenant: _____ Date: _____

Signature of Tenant: _____ Date: _____

Signature of Landlord/Landlord's Agent: _____ Date: _____

Signature of ERA-HSS Case Manager: _____ Date: _____

ACAM HSS Security/Utility/Pet Deposit Receipt

This is an acknowledgment that service provider (Agency Name) _____

(Agency Address and Phone) _____ paid

Landlord (Full Name) _____ a

Security Deposit of \$ _____ (Attach documentation) on (date) _____

Utility Deposit of \$ _____ (Attach documentation) on (date) _____

Pet Deposit of \$ _____ (Attach documentation) on (date) _____

Application fees of \$ _____ (Attach documentation) on (date) _____

for (Tenant Name) _____ at

(Full Address) _____.

Terms and Conditions

1. The total deposit(s) cannot be more than one month's rent.
2. The tenant must reside in the unit for at least four months to receive the deposit back from the Landlord. Otherwise, the Landlord shall return the deposit to the service provider at (Full Address) _____.

I/we understand that with my/our signature I/we acknowledge and accept these terms and conditions.

Landlord Name _____

Landlord's Address _____

Landlord's Email _____ Landlord's Phone _____

Landlord Signature _____ Date _____ Time _____