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HOME-ARP Supportive Services for Existing Housing Developments Administrative Manual



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An amended Administration Manual will be released periodically, and the newest edition overrides all previous editions. Except where otherwise noted, all amendments to the Administration Manual apply to all awards, regardless of year of funding.

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Section 1: Background

The American Rescue Plan (ARP) provided \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations by providing housing, tenant-based rental assistance, supportive services, and non-congregate shelter with the goal of reducing homelessness and increasing housing stability across the country. These grant funds are administered through HUD's HOME Investment Partnerships American Rescue Plan Program (HOME-ARP).

The Indiana Housing and Community Development Authority (IHCDA) received \$54,528,535 in HOME-ARP funding. In April 2022, HUD approved IHCDA's HOME-ARP allocation plan setting aside \$13,200,000 for supportive services. Per the allocation plan, a portion of funds will be used to provide supportive services to households in IHCDA assisted developments, defined as any project that has received all or a portion of its development funding from IHCDA. All households served must meet the HOME-ARP qualifying populations as defined in the US Department of Housing and Urban Development's **CPD Notice 21-10**.

Section 2: Qualifying & Target Populations

2.1 Eligible Program Participants

Qualifying populations are defined in the US Department of Housing and Urban Development's [CPD Notice 21-10](#) as follows:

1. **Homeless**, as defined in [24 CFR 91.5](#) *Homeless (1), (2), or (3)*:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train as station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

2. **At Risk of Homelessness**, as defined in **24 CFR 91.5** *At risk of homelessness*:

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;

- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in [24 CFR 5.2003](#) means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in [24 CFR 5.2003](#) means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in [24 CFR 5.2003](#) means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

4. **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- (1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in [24 CFR 91.5](#), are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed,

and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, **AND** meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at **24 CFR 91.5**:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

2.2 Participant Eligibility Worksheet

Eligible participants in this program are HOME-ARP qualifying households currently residing in an IHCDAs assisted housing development. Subrecipients must ensure full compliance with meeting federal requirements pertaining to identifying and appropriately documenting homeless individuals, by utilizing the IHCDAs Participant Eligibility Worksheet, located on the [Supportive Housing webpage](#).

The Subrecipient must collect documentation from each program participant and ideally a trusted third-party source to determine eligibility status. The worksheet should include the participant's previous homeless status, documentation and its type for proof of current living situation.

2.3 Client Selection and Low Barrier Screening Requirements

Each subrecipient must develop and implement a Tenant Selection Plan (TSP) using the template issued by IHCD located on the [Supportive Housing webpage](#), which clearly describes the policies and procedures utilized by properties receiving funding from IHCD. TSP's must be low barrier, meaning they must refrain from screening out applicants for having too little or no income; poor rental history; poor credit; or a criminal history that does not indicate a credible threat to the health and safety of the property, other residents or staff. All tenant selection plans must meet the federal programming and funding regulations on eligibility and non-discrimination. Significant changes to the TSP document must be submitted to IHCD for approval before implementation.

2.4 Eviction Prevention Requirements

Each subrecipient must develop and implement an Eviction Prevention Plan using the template issued by IHCD located on the [Eviction Prevention and Low Barrier Screening webpage](#). The purpose of this plan is to establish a standardized framework through which the property addresses lease violations and problematic behavior, with the goal of mitigating harm to tenants and to the property. Plans must affirm the property employs eviction only as the last resort. Significant changes to eviction prevention plan should be submitted to IHCD for approval before implementation.

Section 3: Eligible & Ineligible Program Activities

3.1 Supportive Services

While supportive services must be offered to all qualifying households currently residing in an IHCDA assisted housing development, participation in **services cannot be required**. If a household chooses not to engage in any supportive services at the time of enrollment, the subrecipient must continue to offer services, employing some form of outreach at least monthly.

The supportive service provider must utilize a harm reduction approach while supporting program participants. Comprehensive case management and supportive services must be accessible to tenants where they live and offered in a manner designed to maximize housing stability, choice and self-sufficiency. **Participation in supportive services must not be a condition of occupancy.**

3.2 Eligible Costs

In accordance with [HUD Notice CPD-21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program](#), eligible supportive services for this program are listed below. To effectively serve participants and meet the Cost Principles requirements outlined below, not all services outlined in HUD Notice CPD-21-10 are included in the list of eligible services.

- 1) ***Oversight of Eligible Costs:*** All supportive service costs paid for by HOME-ARP must comply with the requirements of HUD Notice CPD 21-10, including requirements in 2 CFR part 200, subpart E, Cost Principles that require costs be necessary and reasonable. If a qualifying household is already receiving the same eligible supportive service or has been approved to receive the same service through another program or provider, the program participant does not have a need for the HOME-ARP service. Subrecipients are responsible for ensuring participants do not receive duplicative assistance.
- 2) ***Direct Provision of Services:*** If services outlined in this section are being directly delivered by a subrecipient, the following costs are eligible project delivery costs for those services:
 - a) The costs of labor or supplies and materials incurred by the subrecipient in directly providing supportive services to program participants.
 - b) The salary and benefit packages of the subrecipient staff who directly deliver the services.

These project delivery costs must be attributable to the identifiable objective of the service delivered, otherwise they are administrative costs of the subrecipient.

- 3) ***Eligible Costs for McKinney Vento Supportive Services and Homelessness Prevention Services:*** Eligible costs for supportive services under either of these two categories include costs associated with the following services:
 - a. ***Childcare:*** The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible. The

childcare center must be licensed by the jurisdiction in which it operated in order for its costs to be eligible. The following conditions also apply:

- Children must be under the age of 13 unless the children have a disability.
- Children with a disability must be under the age of 18.

b. *Education Services:* The costs of improving knowledge and basic educational skills are eligible costs including:

- Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- Screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

c. *Employment assistance and job training:* The costs of establishing and/or operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of:
 - Employment screening, assessment, or testing;
 - Structured job skills and job-seeking skills;
 - Special training and tutoring, including literacy training and pre-vocational training;
 - Books and instructional material;
 - Counseling or job coaching; and
 - Referral to community resources.

d. *Food:* The cost of providing meals or groceries to program participants is eligible.

e. *Housing search and counseling services:* Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. Services are:

- Development of an action plan for locating housing;
- Housing search;
- Tenant counseling;
- Securing utilities;
- Making moving arrangements;
- Outreach to and negotiation with owners;
- Assistance submitting rental applications and understanding leases;
- Assistance obtaining utilities;

- Mediation with property owners and landlords on behalf of eligible program participants;
- Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
- Payment of rental application fees (only for households exiting the covered development).

Please Note: When subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in 24 CFR 5.100, and therefore are not required to be carried out in accordance with the certification requirements of 24 CFR 5.111.

f. Legal services: Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with a qualifying individual or family's ability to obtain and retain housing.

- Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking; appeal of veterans and public benefit claim denials; landlord-tenant disputes; and the resolution of outstanding criminal warrants; landlord/tenant matters, provided that the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are prohibited.
- Services may include client intake, receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
- Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

g. Life skills training: The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Life skills training includes:

- The budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

h. Mental health services: Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals.

- Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the

problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

- Services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

i. Outpatient health services: Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

- Providing an analysis or assessment of program participant's health problems and the development of a treatment plan;
- Assisting program participants to understand their health needs;
- Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
- Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
- Provision of appropriate medication;
- Providing follow-up services; and
- Preventative and non-cosmetic dental care.

j. Outreach services: The costs of activities to engage qualified populations for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

- Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.
- Costs associated with the following services are eligible: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the subrecipient's geographic area.

k. Substance abuse treatment services: Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. The costs include:

- Program participant intake and assessment;
- Outpatient treatment;
- Group and individual counseling;
- Drug testing;
- Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

l. Transportation: Eligible costs are:

- The costs of program participant's travel on public transportation or in a vehicle provided by the subrecipient to and from medical care, employment, childcare, or other services eligible under this Notice;
- Mileage allowance for service workers to visit program participants and to carry out housing inspections;
- The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants with written IHEDA approval;
- The cost of gas, insurance, taxes, and maintenance for the vehicle;
- The costs of subrecipient staff to accompany or assist program participants to utilize public transportation; and
- If public transportation options are not sufficient within the area, the subrecipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
 - Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
 - Payments for car repairs or maintenance must be paid by the subrecipient directly to the third party that repairs or maintains the car; and
 - Subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
- Payments for the cost of gas, insurance, taxes, the one-time payment for car repairs or maintenance described above, and maintenance for vehicles of program participants must be limited to program participants with the inability to pay for such costs and who, without such assistance, would not be able to participate in eligible services under this Section. Subrecipients must maintain written justification for these expenses in the tenant file.

m. Case Management: The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Subrecipients providing these supportive services must have written standards for providing the assistance. Eligible costs are those associated with the following services and activities:

- Conducting the initial evaluation, including verifying and documenting eligibility, for individuals and families applying for supportive services;
- Counseling;
- Developing, securing, and coordinating services;
- Using the Coordinated Entry System (CE);
- Obtaining federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;

- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
- Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.

n. Mediation: HOME-ARP funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

o. Credit Repair: HOME-ARP funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

p. Landlord/Tenant Liaison: Costs of liaison services between property managers/owners and program participants are eligible HOME-ARP costs and may include:

- Landlord outreach;
- Mediation services in (n) for housing issues that may arise between owner, property manager, or other residents and clients;
- Coordination or assistance with the provision of other HOME-ARP eligible services to assist clients to maintain permanent housing.

q. Services for Special Populations: HOME-ARP funds may be used to provide services for special populations, such as victim services, so long as the costs of providing these services are eligible under this section. The term victim services mean services that assist program participants who are victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, stalking, or human trafficking.

r. Financial Assistance Costs: HOME-ARP funds may be used to pay, utility companies, and other third parties for the following costs, as applicable:

- Utility deposits: A standard utility deposit or initiation fee required by the utility company or owner (if owner-paid utilities are provided) for all program participants for the following utilities:
 - Gas
 - Electric
 - Water
 - Sewer
- Utility payments: HOME-ARP funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be

provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

- Moving costs: HOME-ARP funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under this section of the Notice and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

3.3 Administrative Costs

A maximum of 10% of the overall awarded grant money may be used for administrative costs, such as:

- Processing claims
- Supervision of program staff
- Reporting, which includes IHCD required program evaluation and Homeless Management Information System (HMIS) training costs
- Determining participant eligibility
- IHCD approved training

HOME-ARP administration and planning funds cannot be used to pay costs attributable to the regular HOME program. Review section VI.A of [HUD Notice CPD-21-10 Requirements for the use of funds in the HOME-American Rescue Plan Program](#) for more complete understanding of eligible administrative costs.

3.4 Ineligible and Non-Reimbursable Activities

The following activities are ineligible:

1. Financial assistance cannot be on behalf of a program participant who is receiving the same type of assistance through other public sources.
2. Financial assistance cannot be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601 et seq.) and its implementing regulations at [49 CFR part 24](#), or Section 104(d) of the Housing and Community Development Act of 1974 (42 USC 5304(d) and its implementing regulations at [24 CFR part 42](#), during the period of time covered by the replacement housing payments.
3. Financial assistance costs must be paid to a third-party and cannot be paid directly to the participant.

Any other services not specifically listed above as eligible costs are ineligible, unless approved by IHCDA prior to submitting a claim for reimbursement.

Section 4: Parameters of Assistance

4.1 Length of Termination of Assistance

HOME-ARP funding must not supplant existing supportive service funding streams (such as Medicaid reimbursement or Continuum of Care), but rather must be used to complement existing service funding sources and to cover services that are not billable under those programs.

Households who exit the housing development, either voluntarily (such as through moving on) or involuntarily (such as through eviction or lease termination), may continue to receive supportive services for an additional three months.

Service provision to the household may end under either of the following circumstances:

Voluntary termination occurs when the client chooses to leave the program for any reason, including: the client no longer requires assistance, the client has enrolled in another program that provides housing or medical assistance, the client has moved, etc.

Involuntary termination is initiated by the subrecipient due to the client's non-compliance with program requirements or commitment of fraud. Examples of non-compliance/fraud include but are not limited to:

- Participant violates program requirements or no longer needs the services.
- Qualifying participant or household fails to provide requested information for application processing or initial assessment following multiple outreach attempts by the subrecipient, resulting in an inability for the subrecipient to determine eligibility for services; and/or,
- Qualifying participants or household members falsify information in order to receive assistance.

Subrecipients who involuntarily terminate a client must follow a formal termination process which recognizes the client's right to due process of law. This process must include:

- Providing the program participant with a written copy of the program rules and termination process before the participant begin to receive assistance.
- Serving the client with a written notice containing a clear statement of the reasons for termination;
- Permitting the client to a review of decision, which the client is given the opportunity to confront opposing witnesses, present written objections, and be represented by their own counsel, before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and,
- Providing prompt written notice of the final decision to the client. Provide at least a 30-day written notice to the tenant in the event of a lease termination or non-renewal.

During this process, the subrecipient must provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations. Similarly, the subrecipient must provide meaningful access to persons with limited English proficiency.

Section 5: Monthly Reporting and Claim Submissions

5.1 Claims Submission Process

Funds are disbursed on a reimbursement basis through claims submitted to IHCDOnline at <https://online.ihcda.in.gov/> Subrecipients must submit claims to IHCDOnline monthly, by the 15th day of the month. Each claim submission will receive a 10-day grace period. For information on how to use IHCDOnline and submit a claim with the required documentation, please refer to the [Partner's Guide to IHCDOnline](#). Questions regarding the claims process and access to the system should be submitted to claims@ihcda.in.gov. If the question is regarding eligible activities, please contact the Supportive Housing Analyst.

Please submit the following documentation with all claim submissions:

- Claim Summary Page (automatically generated from IHCDOnline)
- HOME-ARP Supportive Services Financial Narrative
- Monthly Reporting Form
- Paystubs for all employees listed on the Financial Narrative
- Administrative Invoices/receipts where the amount charged to the program equals or exceeds \$200.

The HOME-ARP Supportive Services Financial Narrative and Monthly Reporting Form are available to download from the [Supporting Housing webpage](#).

5.2 IDIS Quarterly Reporting Form

IHCDA is required to report on program outcomes directly to HUD through their Integrated Disbursement and Information System (IDIS), a HUD software system for HOME-ARP and other entitlement funds. Subrecipients must complete the IDIS Report Form summarizing HOME-ARP Supportive Services provided to program participants on a quarterly basis. The IDIS Report Form must be emailed to the Supportive Housing Analyst according to the schedule included within the Report. IHCDA will enter this information into IDIS.

The IDIS Report Form is available for download from the [Supportive Housing webpage](#). Additional instructions are included within the form. Questions regarding IDIS Form completion and submission may be emailed to the Supportive Housing Analyst.

5.3 Homeless Management Information System (HMIS)

The Homeless Management Information System (“HMIS”) is a secure, electronic data collection system used to determine the nature and extent of homelessness. Data regarding all homeless individuals assisted with the Program’s grant funds must be entered into either the Indiana Balance of State or the Indianapolis HMIS. IHCDA will determine the HMIS that the subrecipient must use based on the geographic location of the project. Projects serving survivors of domestic violence

may use an HMIS comparable database in lieu of HMIS.

The subrecipient is required to enter participant data at intake, annually, and upon discharge of the program, at a minimum, for all participants. The recipient is encouraged, but not required, to utilize the other features of HMIS such as case notes, service tracking, and reporting functions. The data required for entry into HMIS includes at least the following data elements: Name, Social Security Number, Date of Birth, Race, Ethnicity, Gender, Veteran Status, Disabling Condition, Residence Prior to Entry, Health Insurance at Entry and Exit, Zip Code, Length of Stay at Previous Residence, Housing Move-in Date, and Exit Destination. The recipient agrees to collect any other data elements as IHCDA directs. For HMIS assistance or to get registered to use the system, please contact the HMIS Help Desk at: hmishelpdesk@ihcda.in.gov.

Section 6: Compliance and Monitoring

6.1 Confidentiality Requirements

All subrecipients must develop, implement, and maintain written procedures to require that:

- All records containing personally identifying information of any individual or family who applies for and/or receives HOME-ARP assistance will be kept secure and confidential.
- The address or location of any program participant that is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking will not be made public, except as provided under a privacy policy of the subrecipient consistent with state and local laws and any other grant conditions from other federal grant programs regarding privacy and obligations of confidentiality.

Documenting status of a qualifying population that is fleeing or attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking:

- If an individual or family qualifies because the individual or family is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking then acceptable evidence includes an oral or written statement by the qualifying individual or head of household seeking assistance that they are fleeing that situation. An oral statement may be documented by either –
 1. A written certification by the individual or head of household; or
 2. A written certification by a victim service provider, intake worker, social worker, legal assistance provider, health-care provider, law enforcement agency, pastoral counselor, or an intake worker in any other organization from whom the individual or family sought assistance.

6.2 Document Retention and Recordkeeping

The following records must be retained for each household served by the program for five years after the period of assistance terminates:

- Eligibility determination documentation, including but not limited to:
 - Referral from Coordinated Entry Lead (when applicable)
 - IHADA Participant Eligibility Worksheet and Supporting Documentation
- Leasing documents
- Documentation related to emergency transfers requested under 24 CFR 5.2005(e) and 92.359 pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of those requests.

HUD and the Comptroller General of the United States, any of their representatives, have the right

of access to any pertinent books, documents, papers or other records of the participating jurisdiction, state recipients, and subrecipients, in order to make audits, examinations, excerpts, and transcripts.

All participant-signed forms must include the Equal Housing Opportunity and Accessibility logos below.



6.3 Subaward Agreements

Subrecipients who will make additional subawards to supportive services providers to carry out all or a portion of the program must enter into subaward agreements that comply with HOME-ARP program requirements. IHCDA has created a subaward agreement template that subrecipients must use to ensure compliance. The template can be found on the [Supportive Housing webpage](#) of IHCDA's website. Subrecipients who wish to use their own agreements or modify the template (excluding areas highlighted for customization) must get preapproval from IHCDA.

6.4 Client Feedback Form

Subrecipients are required to design a participant feedback form which must be given to households on a regular basis, and at a minimum annually. The form must ask questions related to the client's experience and satisfaction with the supportive services administered by the subrecipient and must provide the option for feedback to be provided anonymously. Subrecipients are encouraged to collect quantitative and qualitative data and should have policies for using client feedback to make improvements to the program.

6.5 Closeout Reports

A final close out report must be submitted to IHCDA within 30 days after the award expires. IHCDA will provide a form on which subrecipients will record information regarding their award performance and experience administering the grant. All reports must be submitted as requested by IHCDA for the subrecipient to remain eligible for future funding.

6.6 Re-allocation Policy

Unclaimed Funds: Funds that were allocated to a specific subrecipient that were not claimed by the subrecipient during the grant term or were leftover in the administrative category and not used by IHCDA.

At any point during a grant cycle IHCDA may require subrecipients who are behind on the benchmarks defined in their award agreements to provide a spend-down plan for unclaimed funds remaining on their supportive services awards. Spend-down plans must be completed on a standard form provided by IHCDA and must include information on anticipated monthly expenditures for supportive services and administrative costs. IHCDA will review all submitted spend-down plans to verify that planned expenditures are reasonable when compared to the subrecipient's claims history and proposed goals for number of households served.

If a subrecipient's spend down plan is determined by IHCDA to be insufficient to expend the total award amount within the term of the award agreement, IHCDA may offer the subrecipient a 3-month extension to their award period and/or may de-allocate the portion of the award that is not expected to be spent. If an organization fails to provide a spend-down plan when requested, IHCDA will review the organization's claim history to determine if they are on track to expend their full award amount. Subrecipients who do not submit the required spend-down plan when requested are not eligible for an award extension and may have all or a portion of their award de-allocated. IHCDA will notify subrecipients of any award de-allocation via email with a letter stating the amount by which the award has been reduced. If IHCDA chooses to allow a grant extension, subrecipients will be notified via email with a letter stating the new grant end date and benchmarks that must be met during the extended period.

HOME-ARP funds de-allocated through this process may be added to the total available award amount under the next HOME-ARP Supportive Services Request for Qualifications or may be allocated to another subrecipient(s) with a HOME-ARP award who have met award benchmarks. Such allocations will follow this policy and will be approved by IHCDA's Executive Team through delegated authority.

6.7 Award Monitoring

The Supportive Housing Analyst will perform program compliance checks throughout the program year by reviewing quarterly reports, HMIS data, claims, and other information.

A more thorough monitoring of the program will also occur. The monitoring review may be done remotely or in person. At least three weeks of notice will be given to the recipient before monitoring begins so that the recipient can prepare using a monitoring checklist. The checklist contains a list of areas that will be reviewed and documents that will need to be made available at the time of monitoring. Upon completion of a monitoring review, IHCDA will send a letter detailing all concerns and findings discovered during the review. The letter will be sent within 30 calendar days of the monitoring unless an investigation of findings requires more time. If there are findings or concerns discovered, the letter will request the recipient to submit a specific resolution or correction within a certain period of time. Significant deficiencies in program files or other record keeping that are found during a monitoring will result in required Plans of Corrective Action with possible loss of funds or repayment to IHCDA.

Section 7: Federal Requirements

7.1 A133 Audit and Financial Statements

Each year IHCDA collects Year-End Financial Statements and A133 audits from its grantees/subrecipients. To provide better customer service we have changed the submission process. Organizations that are required to submit an A133 Audit will now send their financials to IHCDA at A133@ihcda.in.gov.

A133 Audit Required

Subrecipients that expend \$750,000 or more in federal funds (as a collective whole from all of their grants) in a fiscal year must be audited in accordance with the requirements of OMB Circular A-133, and a copy of such audits must be provided to IHCDA. If this applies to your organization, please submit an electronic copy of your financial statements and A-133 Audit to IHCDA at A133@ihcda.in.gov. Hard copies will not be accepted. Questions regarding your A133 audit should be directed to A133@ihcda.in.gov.

Also, please check that your A-133 audit is performed by an approved auditor. You will find a list of approved auditors IHCDA's website.

A133 Audit Not Required:

Smaller agencies that do not spend over \$750,000 of federal funds (as a collective whole from all of their grants) will only need to submit their year-end financial statement or Form 990 when responding to an RFQ.

Financials are due to IHCDA according to the following schedule:

Year End Date:	Due Date:
June 30	March 31 or 30 days after receipt of the auditor's report (whichever is earlier)
Dec 31	Sept 30 or 30 days after receipt of the auditor's report (whichever is earlier)

7.2 Fair Housing

Protected Classes and Prohibited Activities under Fair Housing and HUD's Equal Access Rule

The owner or agents of the owner shall not discriminate in the provision of housing on the basis of race, color, sex, national origin, religion, familial status, or disability [the seven protected classes under the Fair Housing Act]. Nondiscrimination means that owners cannot refuse to rent a unit, provide different selection criteria, fail to allow reasonable accommodations or modifications, evict, or otherwise treat a tenant or applicant in a discriminatory way based solely on that person's

inclusion in a protected class. Owners may not engage in steering, segregation, false denial of availability, denial of access to services or amenities, discriminatory advertising, or retaliation against individuals that make fair housing complaints.

Effective March 5, 2012, all HUD funded properties (including HOME/CDBG/CDBG-D/NSP funding) are subject to the rule entitled “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.” According to this rule, HUD-assisted properties must make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status. Additionally, HUD-assisted housing providers are prohibited from inquiring about the sexual orientation or gender identity of applicants and occupants for the purpose of determining eligibility for housing. For purposes of this rule, the term “gender identity” means actual or perceived gender-related characteristics and the term “sexual orientation” means homosexuality, heterosexuality, or bisexuality.

Property owners & managers must allow people with disabilities to make reasonable modifications (structural changes) so that they can fully enjoy their homes. Also, property owners and managers must allow reasonable accommodation (flexibility in rules and policies) so that persons with disabilities may fully enjoy their homes.

Required Actions

All subrecipients should be familiar with both state and federal civil rights and fair housing laws. IHCDA strongly encourages subrecipients to provide Fair Housing and Equal Opportunity training for all staff, including maintenance staff, associated with any property. Staff should attend Fair Housing and Equal Opportunity training at least once every calendar year.



See Chapter 10 of IHCDA’s HOME, CDBG and HTF Manual for more information on Fair Housing, Equal Opportunity, Non-Discrimination and Equal Access.

7.3 Violence Against Women Reauthorization Act of 2021 (VAWA)

Notification of Occupancy Rights under VAWA and Certification Form

The subrecipient must ensure that notice of occupancy rights which is set forth in **Form HUD 5380** is provided to each of its applicants and to each of its tenants. The subrecipient must provide the certification form set forth in **Form HUD 5382** to the applicant for a HOME-assisted unit at the time the applicant is admitted to a HOME-assisted unit or denied admission to a HOME-assisted unit based on the subrecipient’s participant selection policies and criteria. The subrecipient

must also provide the notice of occupancy rights and the certification form with any notification of eviction.

Lease Addendum

The IHCD A lease addendum incorporates all the requirements that apply to the owner under 24 CFR part 5, subpart L, and 24 CFR 92.359(e), including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). The IHCD A lease addendum also states that the tenant may terminate the lease without penalty if IHCD A determines that the tenant has met the conditions for an emergency transfer under 24 CFR 5.2005(e).

Emergency Transfers

The subrecipient must use and implement the emergency transfer plan set forth in **Form HUD-5381** and must make the determination of whether a tenant qualifies for an emergency transfer under the plan. The subrecipient may provide **Form HUD -5383** to a tenant that is requesting an emergency transfer. With respect to tenants who qualify for an emergency transfer and who wish to make an external emergency transfer when a safe unit is not immediately available, the subrecipient must provide a list of properties in the jurisdiction that include HOME-assisted units. The list must include the following information for each property: The property's address, contact information, the unit sizes (number of bedrooms) for the HOME-assisted units, and, to the extent known, any tenant preferences or eligibility restrictions for the HOME-assisted units. In addition, the subrecipient may:

- (1) Establish a preference under the subrecipient's HOME program for tenants who qualify for emergency transfers under 24 CFR 5.2005(e); and
- (2) Coordinate with victim service providers and advocates to develop the emergency transfer plan, make referrals, and facilitate emergency transfers to safe and available units.

Prohibited Denial/Termination

Subrecipient shall ensure that any applicant for or tenant of HOME-assisted housing may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

Lease Terms

Subrecipient shall ensure that an incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking shall not be construed as:

- A. A serious or repeated violation of a lease for HOME-assisted housing by the victim or threatened victim of such incident; or
- B. Good cause for terminating the assistance, tenancy, or occupancy rights to HOME-assisted housing of the victim of such incident.

Termination Based on Criminal Activity & Bifurcation of Lease

No person may deny assistance, tenancy, or occupancy rights to HOME-assisted housing to a tenant solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault, or stalking. Notwithstanding the foregoing, the subrecipient and/or manager of HOME-assisted housing may bifurcate a lease for the housing in order to evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of the housing. The subrecipient and or manager of HOME-assisted housing must provide any remaining tenants with an opportunity to establish eligibility and a reasonable time to find new housing or to establish eligibility.

Confidentiality of Tenant Information Related to Domestic Violence, Dating Violence, Sexual Assault, or Stalking

The subrecipient shall ensure that any information submitted to the subrecipient and or staff of HOME-assisted housing including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking shall be maintained in confidence and may not be entered into any shared database or disclosed to any other entity or individual, except to the extent that the disclosure is:

- A. Requested or consented to by the individual in writing.
- B. Required for use in an eviction proceeding against any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking; or
- C. Otherwise required by applicable law.

Remedies Available to Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

The subrecipient may bifurcate a lease, or remove a household member from a lease to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual:

- (i) Without regard to whether the household member is a signatory to the lease; and
- (ii) Without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant.

A lease bifurcation shall be carried out in accordance with any requirements or procedures as may be prescribed by Federal, State, or local law for termination of assistance or leases. If a household who lives in a HOME-assisted rental unit separates under 24 CFR 5.2009(a), the remaining tenant(s) may remain in the HOME-assisted unit.

Limitations of VAWA Protections

VAWA as applied in this Agreement does not limit the authority of the subrecipient, when notified of a court order, to comply with a court order with respect to:

- The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or
- The distribution or possession of property among members of a household.

VAWA as applied in this Agreement does not limit any available authority of the subrecipient to evict a tenant for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking that is in question against the tenant or an affiliated individual of the tenant. However, the subrecipient must not subject the tenant, who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, or is affiliated with an individual who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, to a more demanding standard than other tenants in determining whether to evict or terminate assistance.

VAWA as applied in this Agreement does not limit any available authority of the subrecipient to terminate assistance to or evict a tenant under a covered housing program if the subrecipient can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the Project would be present if that tenant or lawful occupant is not evicted or terminated from assistance. In this context, words, gestures, actions, or other indicators will be considered an “actual and imminent threat” if they meet the standards provided in the definition of “actual and imminent threat” in 24 CFR 5.2003.

Any eviction or termination of assistance, should be utilized by the subrecipient only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes but must be tailored to particularized concerns.

Required Forms

IHCDA mandates the use of the following HUD VAWA forms for all projects subject to VAWA compliance, as defined in Section 7.4 above.

- **HUD 5380**: Notice of Occupancy Rights Under VAWA. Must be provided at the following times, along with a copy of the HUD 5382:

- At the time of initial admission; and
 - At the time of denial of tenancy; and
 - When termination / eviction notices are sent.
- **HUD 5381**: Model Emergency Transfer Plan. The owner must create a model plan specific to each project. The plan must be made available for review by tenants and by IHCDA.
- **HUD 5382**: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking. This form is to be used by tenants as a self-certification form. A copy must be attached any time the HUD 5380 is distributed.
- **HUD 5383**: Emergency Transfer Request. This form is used by tenants to request a transfer under VAWA.