

Required Policies and Procedures

To help ensure program compliance, subrecipients are required to document in writing and implement the below policies and procedures. As outlined on Page 12 of this manual, within a full monitoring, IHEDA compliance monitors will verify that your organization has the below policies and procedures on file.

Name of Policy Document Required Language Within Policy

Agency Policies	
Drug-free Workplace Policy	Policy should specify compliance with drug-free workplace and outline consequences (up to and including termination) of violating it.
Non-discrimination Policy	For both employees and clients, the policy should specify individuals will be treated fairly without regard to age, gender, race, religion, national origin, sexual orientation, veteran status or political affiliation.
Homeless Representation Policy (CoC required, ESG preferred)	Signed certification that organization has homeless representation on board of directors OR waiver from HUD allowing alternate arrangements.
Programmatic Policies	
Housing First	Components: Few prerequisites for permanent housing entry; low-barrier admissions policy; rapid entry into housing; supportive services offered BUT not required; tenants have full rights and legal protections.
Coordinated Entry Policy	This policy should describe your organization's CE region and how your organization participates in coordinated entry. An extra, optional component would be describing efforts to build CE capacity (i.e. through training case workers, etc....)
Equal Access Policy	Agency policies must reflect Equal Access and non-discrimination requirements, including non-separation of families and housing/serving clients in accordance with client's stated gender identity.
Affirmatively Furthering Fair Housing	This policy speaks to an organization's approach to combatting discrimination, identifying inequities, and address inequities so to advance fair housing.
RRH/HP Manual Required Policies	
Confidentiality Policy	This policy outlines employee responsibilities in protecting client PII (personal identifiable information). The policy should mention specific measures for protecting PII and repercussions for mishandling PII.
Client Grievance and Termination Policy	This policy should describe the separation of duties; a grievance should not be reviewed by someone mentioned in the complaint and, if possible, not by subordinates of the person mentioned in the complaint. It should outline how and when clients are notified of grievances and their ability to appeal. It should explain the termination policy.
Maintenance of Records Policy	Policy requiring records maintained for a minimum of three years after grant closeout
Client/Service Policies	
Homeless Verification & Documentation Policy	This must stipulate how and when status is verified, prioritization for verification (3 rd -party reference then intake worker confirmation then client self-attestation of status).
Order of Priority for Chronically Homeless Individuals and Families	The policy must establish that chronic homelessness, longest stays in homelessness, and the most vulnerable are prioritized first.
Client Grievance & Termination	See description up above under "RRH/HP Manual Required Policies".
VAWA Requirements Policy	Please adopt the exact language from HUD Form 5380 .
Lead-Based Paint Policy	This policy should describe the requirement of completing the Lead-Based Paint Exemption Form for every RRH/HP rental unit. Policy should describe that for units that are non-exempt from the lead-base housing rule, case workers are to complete a Lead-Based Paint Disclosure Form and an LBP Ongoing Maintenance Agreement. The policy may also mention the distribution of HUD's informational document – Lead-based Paint Protection Resource .