



# TANF

Short-Term Rapid Re-Housing and Homeless Prevention

## Program Manual

2024-2025



# Table of Contents

<b>Introduction</b> .....	3
Purpose .....	3
Establishment of Funds .....	3
Regulations and Authority .....	3
Eligible Program Components .....	3
Short-Term Rapid Re-Housing (RRH).....	3
Homeless Prevention (HP) .....	4
Administrative .....	4
<b>Grant Administration</b> .....	5
Contact Information .....	5
Financial Processes.....	6
Funding Period.....	6
Claims Process/Request for Payment.....	6
<i>Claims Submission Requirements:</i> .....	6
<i>Required Supporting Documents Information</i> .....	7
<i>Common Reasons for Denied Claims</i> .....	7
<i>Claims Timeline</i> .....	7
Return of Funds, Repayments, and Adjustments .....	7
<i>Return of Funds (ROF)</i> .....	8
<i>Repayment</i> .....	8
<i>Adjustment</i> .....	8
Budget Modifications.....	8
Budget & Award Amendments .....	8
Spending Plans and Deadlines .....	8
Using TANF as Match .....	9
<i>TANF Income Requirement:</i> .....	9
<i>ESG Income Requirement:</i> .....	9
Homeless Management Information System .....	9
Data Entry Requirements: .....	9
CAPER Reports .....	10
HMIS + DV ClientTrack Resources .....	11
Coordinated Entry.....	11
Reporting.....	11

IHCDA's Reporting to FSSA .....	12
<i>Monthly Client-level Detail Report:</i> .....	12
<i>Quarterly Report:</i> .....	12
<i>Annual Report:</i> .....	12
Monitoring .....	12
Recordkeeping Requirements .....	14
Point-In-Time Count & Housing Inventory Chart.....	14
PIT & HIC Resources:.....	14
Grant Closeout .....	15
<b>Program Administration</b> .....	16
Program Participant Eligibility .....	16
Program Eligible Costs .....	17
Program Administration Requirements .....	19
IHCDA Policy Requirements .....	19
HUD Policy Requirements .....	19
Violence Against Women Reauthorization Act (VAWA) of 2013 .....	21
<b>Addendums</b> .....	22
Addendum A - Required Policies and Procedures.....	22
Addendum B - Client Files (Required Documents) .....	23
Addendum C - Claims (Acceptable Supporting Documentation) .....	26

# **Introduction**

\*This manual is an ever-evolving document that is subject to change. Please do not print or save this document as a reference tool. Instead, it is best practice to access the Manual via the **IHCDA website** for the most up-to-date version\*

## **Purpose**

The Temporary Assistance for Needy Families (TANF) Short-Term Rapid Re-Housing and Homeless Prevention (RRH/HP) Manual is designed to be a supportive resource for all agencies receiving funding through IHCDA for TANF RRH/HP. This manual provides clear and concise guidance for subrecipients on TANF: grant requirements, grant administration processes, timelines, and general resources.

## **Establishment of Funds**

The TANF RRH/HP Block Grant was awarded to IHCDA from the Indiana Family and Social Services Administration (FSSA) to advance the efforts in short-term Rapid Re-Housing (RRH) and Homeless Prevention (HP). This grant program serves statutory TANF purpose number one, which is to: Assist needy families so that children may be cared for in their own homes or in the homes of relatives.

## **Regulations and Authority**

The IHCDA TANF RRH/HP program is administered under the provisions of the FSSA, Division of Family Resources (DFR). Therefore, FSSA TANF policy informs who is considered an “eligible household” for RRH/HP and outlines assistance and service limits for the program.

IHCDA also utilizes terminology, definitions, and policies established by HUD to inform some elements of the TANF program, which are exemplified in this Manual. Finally, IHCDA utilizes specific Emergency Solutions Grant (ESG) regulations as a framework for TANF RRH/HP requirements and policies. While IHCDA applies some ESG regulations to the TANF RRH/HP program, it does not abide by all ESG regulations. Please refer to this Manual to clearly understand which ESG regulations the TANF RRH/HP grant will employ.

## **Eligible Program Components**

Below is an outline of the eligible program components for the 2024-2025 TANF program:

### **Short-Term Rapid Re-Housing (RRH)**

**Rapid Re-Housing**, as defined by HUD, is an intervention informed by a Housing First

approach. Rapid Re-Housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services.

As it pertains to the 2024-2025 TANF grant, “short-term” Rapid Re-Housing refers to assistance that does not exceed 4 months of assistance.

### **Homeless Prevention (HP)**

**Homeless Prevention**, as defined by HUD, is an intervention designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human habitation. Homeless Prevention supports people who are at risk of homelessness rather than people who are already homeless.

### **Administrative**

Administration costs are indirect program expenses that include but are not limited to eligibility determination activities, staff time for employees performing payroll and accounting activities for the program, planning and scheduling costs, etc.

Detailed descriptions of eligible costs within TANF RRH/HP are discussed under the **Program Administration** section of this manual.

# Grant Administration

Information regarding the TANF RRH/HP program can be found on IHCD's **TANF website**. This webpage can be a helpful resource and tool for all subrecipients. Please visit this webpage often for updates to this Manual, forms, trainings and other required documentation.

## Contact Information

If subrecipients need support or have questions about the TANF RRH/HP program, they may reach out to the IHCD Community Services Grants Team. The following instructions outline when to reach out to specific IHCD staff members:

- For program/grant administration guidance, HMIS/data questions, late claim approvals, budget modifications, technical support and other day-to-day questions, please reach out to the **TANF Analyst**.
- For early contract termination or other contract related issues, please reach out to the **TANF Program Manager**.
- For questions about supporting documentation and compliance, please reach out to the **TANF Monitor**.
- If you do not hear back from either the TANF Analyst or Program Manager, please reach out to the **IHCD Community Services Grants Team**.

Staff	Position	Email	Phone
Laura Drascic	TANF Analyst	<a href="mailto:ldrascic@ihcda.IN.gov">ldrascic@ihcda.IN.gov</a>	317-232-7033
Jim Flatford	TANF Program Manager	<a href="mailto:jflatford@ihcda.IN.gov">jflatford@ihcda.IN.gov</a>	317-941-4262
Wes Bremer	TANF Monitor	<a href="mailto:wbremer@ihcda.IN.gov">wbremer@ihcda.IN.gov</a>	317-232-9080
IHCD Grants Team	N/A	<a href="mailto:communityservices@ihcda.IN.gov">communityservices@ihcda.IN.gov</a>	N/A

## Financial Processes

### Funding Period

All TANF funding provided to subrecipients must be used for expenses that are incurred and paid for on or after June 1st, 2024, and on or before May 31st, 2025.

If subrecipients receive their award after June 1<sup>st</sup>, 2024, they may request reimbursement for any incurred costs that qualify under the TANF RRH/HP program components dating back to June 1<sup>st</sup>, 2024.

### Claims Process/Request for Payment

This TANF grant operates on a **monthly reimbursement** basis. Every month, subrecipients incur eligible program costs and proceed to request reimbursement from IHCD. To request reimbursement from IHCD, subrecipients must submit a claim through [IHCDOnline](#).

If your agency does not already have an IHCDOnline account, please register [here](#).

#### Claims Submission Requirements:

- Subrecipients cannot claim more than once a month, unless they seek approval from the TANF Analyst.
- Only 12 claims are allowed per operating year.
- Claims are due **on or before the 15<sup>th</sup>** of every month. Each claim represents one month of expenses that were incurred or paid during the **previous month**. (Ex: June expenses should be claimed by July 15<sup>th</sup>.)
- Claims must be submitted electronically via [IHCDOnline](#).
- For every eligible expense, subrecipients **must** submit supporting documentation proving “cost incurred” and are **strongly encouraged** to submit supporting documentation proving “proof of payment”.
- Failure to provide supporting documentation proving “cost incurred” will result in claims being denied.
- A **Claims Narrative Form** **must** be submitted with each claim.
- If the subrecipient anticipates they will be unable to submit their claim by the 15<sup>th</sup> of the month, they are required to reach out to the **TANF Analyst** **before** the deadline and request an extension. If approved, the email documenting permission to submit a late claim from the TANF Analyst **must** be included in the late claim submission. Any late claims submitted without permission from the TANF Analyst will be denied.

**\*By submitting monthly claims in IHCD Online, subrecipients are confirming that all their data entered into HMIS/DV Client Track is up-to-date and accurate. \***

### Required Supporting Documents Information

Supporting documents are required with each claim by all subrecipients. Failure to provide supporting documentation will result in claims being denied.

Supporting documentation is required in order to verify that all expenses were used to either:

- Provide Rapid Re-Housing services to homeless program participants
- Provide homeless prevention services to program participants at risk of homelessness
- Provide admirative support to manage the program

More information about eligible expenses is provided in the **Program Administration** section.

**Addendum C** outlines acceptable forms of supporting documentation subrecipients are required to include with each claim submission. If subrecipients have questions regarding acceptable forms of supporting documentation, please reach out to the **TANF Monitor**.

### Common Reasons for Denied Claims

- Ineligible expenses
- Incorrect dates
- Incorrect amounts/totals
- Unauthorized signatures
- IHCDOnline user error
- Lack of supporting documentation

### Claims Timeline

After a subrecipient's claim submission is approved by IHCD's claims team, the subrecipient should receive their payment within 30 days. This timeline is determined by when a claim is **approved** by IHCD, not by when it is **submitted** by the subrecipient to IHCD.

If subrecipients need technical support on how to use **IHCDOnline**, questions regarding denied claims, or claims submissions please reach out to [claims@ihcda.IN.gov](mailto:claims@ihcda.IN.gov).

### **Return of Funds, Repayments, and Adjustments**

There are three situations in which funding must be adjusted and/or returned to IHCD: Return of Funds (ROF), Repayments, and Adjustments.



### Return of Funds (ROF)

A ROF transaction is initiated to return money after an award is closed. A ROF does not allow an agency to spend the funds after they are returned. If this occurs, please reach out to the TANF Analyst.

### Repayment

A repayment transaction consists of a subrecipient repaying funds to the State. The transaction will repay funds back into the award amount, and those funds will be available to spend again. If you are requesting a repayment, please reach out to the TANF analyst.

### Adjustment

An adjustment transaction allows an award recipient to make corrections to line items that have already been claimed as charges within an award. Adjustment claims requests are very rare. If you need this request, please reach out to the TANF Analyst.

## **Budget Modifications**

In certain instances, subrecipients may request modifications to the original budget provided in the grant agreement to move funds to another program activity, subject to IHCD A approval. Subrecipients must submit a **budget modification form** via email to the **TANF Analyst** and to [communityservices@ihcda.in.gov](mailto:communityservices@ihcda.in.gov) outlining the proposed modification.

Subrecipients will be contacted via email by the TANF Analyst once the modification is approved and processed. **Modifications do not change the grant amount, only the program component in which funding can be spent.**

## **Budget & Award Amendments**

A budget amendment may occur if a subrecipient is either unable to spend the entirety of their funding and their award amount is reduced or if additional award funding is available and their award amount is increased. An award amendment may occur if the grant award period is extended to a later date. Budget and award amendments are carried out by the **TANF Program Manager** and are approved at their discretion

Should a subrecipient receive a budget and/or an award amendment, they will be contacted via email by the TANF Program Manager once the amendment is approved and processed. If approved, a grant amendment agreement will be sent to the subrecipient for review and signature.

## **Spending Plans and Deadlines**

All TANF projects are expected to spend the entirety of their award. IHCD A reserves

the right to assign spending plans to TANF projects with low funding utilization. If this occurs, the TANF Analyst will reach out to the subrecipient via email to create a spending plan and required deadlines.

If subrecipients have questions or concerns about spending their full award, please reach out to the TANF Analyst for help and support.

### Using TANF as Match

**\*Subrecipients who are NOT using TANF as match for ESG can disregard this section of the Manual. \***

Per 24 CFR 576.201(b)(2), subrecipients are allowed to use TANF RRH/HP funds as match for ESG.

Families enrolled in TANF who will later be enrolled in ESG must also be eligible under ESG participant requirements. Specifically, households must meet **ESG's Income requirement** from the beginning of their TANF assistance. The difference between the TANF and ESG income requirements are as follows:

#### TANF Income Requirement:

- Annual household income cannot exceed 200% of the **Federal Poverty Level**.

#### ESG Income Requirement:

- Per 24 CFR 576.401(b), annual household income cannot exceed 30% of the **HUD-determined median family income**.
- ESG Income & Rent Calculation Worksheet (use this in place of the TANF Income Eligibility Worksheet in Addendum B – Client Files)

If unforeseen discrepancies between TANF and ESG requirements occur, subrecipients who use TANF as match for ESG are encouraged to follow the stricter ESG requirements.

For guidance on how to furnish TANF documentation as match for ESG, please reference Pages 24-26 of the current **IHCDA ESG Manual**.

## Homeless Management Information System

The Homeless Management Information System (HMIS) is a database that records and stores client-level data regarding the delivery of housing and services to households who are homeless and/or at-risk of homelessness.

### Data Entry Requirements:

- TANF subrecipients are required to enter data on all program participants served by the TANF RRH/HP program into HMIS within **five business days** of intake and discharge in accordance with HUD's standards on participation,

data collection, and reporting. Though subrecipients have up to five days, it is best practice to enter data into HMIS as soon as possible. Prompt entering of data contributes to higher data accuracy.

- Subrecipients serving survivors of domestic violence are required to enter data into **DV ClientTrack** or a “comparable database” within **five business days** of intake and discharge in accordance with HUD’s standards on participation, data collection, and reporting.
- All subrecipients are required to enter program “**services**” within HMIS/DV ClientTrack. (Ex. Case Management, Housing Search & Placement, etc.)
- Once a subrecipient has stopped providing assistance to a family, they are required to complete an “**exit assessment**” within HMIS/DV ClientTrack.
- Subrecipients administering Rapid Re-Housing programs must enter a “**housing move in date**” for clients who eventually find/secure housing through the program. This data point is directly used for the **Point In time Count & Housing Inventory Chart** mentioned in the **Program Administration** section of this manual.

**\*By submitting monthly claims in IHCD Online, subrecipients are confirming that all their data entered into HMIS/DV Client Track is up-to-date and accurate.\***

The IHCD TANF Analyst will monitor data entry progress and data quality on a regular basis. If subrecipients are not entering data in a timely, consistent manner, this may impact subrecipients’ current and future funding opportunities with IHCD. **Consistent noncompliance with IHCD’s data entry requirements could lead to contract termination.**

If subrecipients have concerns about their data quality, please reference IHCD’s **Data Quality Plan** which guides users on best practices and elements to data quality.

### **CAPER Reports**

IHCD strongly encourages subrecipients to run the Consolidated Annual Performance and Evaluation Report (CAPER) on a regular (monthly/quarterly) basis. Running a CAPER consistently provides subrecipients with information about their agency’s data quality, number of clients served, demographics, etc., which can be utilized for the subrecipient’s benefit.

The CAPER is **required** to be submitted **annually** by all subrecipients, therefore subrecipients that run the CAPER on a regular basis can address data quality errors prior to their annual submission deadline.

## HMIS + DV ClientTrack Resources

For technical assistance, training, or questions about HMIS, please contact the HMIS helpdesk - [HMISHelpDesk@ihcda.IN.gov](mailto:HMISHelpDesk@ihcda.IN.gov)

For technical assistance, training, or questions on the DV ClientTrack database, please contact the ClientTrack helpdesk - [DVHelpDesk@ihcda.IN.gov](mailto:DVHelpDesk@ihcda.IN.gov)

HMIS/DV ClientTrack manuals and How-to Guides can be found on the [IHCD A website](#).

## Coordinated Entry

The Coordinated Entry (CE) process intends to help communities prioritize assistance based on vulnerability and severity of service needs. The following information outlines which TANF projects are required to use the Coordinated Entry system, and which projects can request to utilize their own process for referring and selecting families for assistance.

- **Rapid Re-Housing Projects** who are **using the TANF Program as match** for ESG are **required** to use the Coordinated Entry system when selecting families to assist. If a Subrecipient is using TANF as match, the CE requirements of the ESG Program will apply. More information on using TANF as match can be found in the **Match** section of this Manual.
- **Rapid Re-Housing** Projects who are **not using the TANF Program as match** for ESG can request to use their own internal selection process in place of the Coordinated Entry system when selecting families to assist. Subrecipients will be required to reach out the TANF Analyst and provide documentation on how their process for prioritization and selection functions.
- **Homeless Prevention** Projects, regardless of if a Subrecipient is using TANF as match, do **NOT** use the Coordinated Entry system for prioritization and selection. The Subrecipient must utilize their own internal process for prioritizing and selecting families and will be required to provide documentation on how their process for prioritization and selection functions.

## Reporting

Subrecipients are **NOT** responsible for submitting reports to FSSA (mentioned below). Subrecipients **ARE** responsible for entering required data into HMIS/DV ClientTrack in a timely manner. **The data submitted by subrecipients in HMIS and/or DV ClientTrack will be directly used to create the IHCD A reports to FSSA.** If subrecipients do not enter the required data within **five business days** of intake/discharge, it could lead to

contract termination and/or impact their ability to receive funding from IHCDCA in the future.

### **IHCDA's Reporting to FSSA**

FSSA requires that IHCDCA submit monthly, quarterly, and annual CAPER reports outlining TANF grant expenditures and provided services. It is essential that subrecipients abide by the data entry requirements outlined in the HMIS section of this Manual to ensure accurate and quality data is being submitted to FSSA.

The following information outlines the reports IHCDCA will submit to FSSA:

#### Monthly Client-level Detail Report:

The items below will be in IHCDCA's monthly client-level detail reports to FSSA:

- Client Unique Identifier – an alphanumeric identifier for everyone receiving TANF services.
- Service Date
- Service Description
- Service Payment Amount
- Indiana county of service or county of client's residence

#### Quarterly Report:

The following will be included in IHCDCA's quarterly reports to FSSA:

- The total number of unique individuals served each quarter is broken down by month, county, and program component.

#### Annual Report:

The following will be included in IHCDCA's annual report to FSSA:

- Brief narrative of the activities of the programs funded by TANF
- Copies of Quarterly Reports
- Confirmation of annual Single Audit of IHCDCA

## **Monitoring**

In order to track a subrecipient's program compliance, ensure accurate spending of TANF RRH/HP funds, prevent fraud, waste and abuse, and identify technical assistance needs, IHCDCA staff will monitor subrecipients by conducting either a site visit or desk review. In addition to formal monitoring, all subrecipients are continually monitored through claims review and progress data collected during the award year for each grant.

Establishing good documentation practices **at the beginning** of a grant award is an effective way to reduce noncompliance and improve the monitoring process.

**Addendums A-C** are essential resources that all subrecipients should review and reference often during program implementation.

**Addendum A** is a list of the **policies and procedures** subrecipients should have in writing and implement as part of their TANF Rapid Re-Housing and homelessness prevention efforts.

**Addendum B** lists the **client files** your organization is required to maintain to establish client eligibility in a designated project type (i.e. HP or RRH).

**Addendum C** outlines the documentation requirements for **submitting a claim**.

IHCD Monitoring Process	
<b>Monitoring Notice</b>	Compliance monitors notify the subrecipient that a particular grant is being monitored for either <b>claims monitoring</b> or <b>full monitoring</b> . Notice will include the grant agreement(s) involved and can include a request of documentation.
<b>Entrance Conference</b>	Compliance monitors <u>may</u> meet with agency staff to discuss the monitoring and go over the process. The session often includes a review of the requested documents and an opportunity for the agency staff to ask any questions about the process.
<b>Monitoring</b>	In a <b>full monitoring</b> , compliance monitors review: client files, staff and board information, policies and procedures, monthly claims, and all relevant documentation for administration of the grant.  A <b>claims monitoring</b> is limited to reviewing some of a subrecipient's monthly claims.
<b>Exit Conference</b>	Agency staff meet with compliance monitors to discuss the progress on the monitoring including the status of the file review, any outstanding requests or documentation needed, and provide insight into any commendations or concerns that arise from the monitoring process.
<b>Monitoring Report</b>	Compliance monitors issue a report for the agency regarding the outcome of the monitoring. Concerns are issues that are problematic but need no further action. Findings are issues that directly violate or fail to fulfill a federal regulation or stipulation from the award/grant agreement. Findings must be resolved before a monitoring can be closed.

<b>Project Improvement Plan (PIP)</b>	If there are significant findings in the operations of the grant, an agency receives a PIP. PIP's involve additional meetings and technical support before a monitoring can be closed.
---------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

If subrecipients have any questions regarding the Monitoring process, please reach out to the **TANF Monitor**.

### Recordkeeping Requirements

Subrecipients must maintain all records from their TANF grant award for **at least three years** following the end date specified on their award agreement.

**Addendums B & C** detail the documentation subrecipients are required to keep on file for claims and client-file documentation for program participants. All records may be request and viewed by the IHCD Compliance team.

### Point-In-Time Count & Housing Inventory Chart

All TANF subrecipients administering **Rapid Re-Housing** programs are required to participate in HUD's annual homeless Point-In Time and Housing Inventory Count.

The **Point-in-Time (PIT) Count** is a count of sheltered and unsheltered people who are experiencing homelessness on a single night during the last 10 days in January. Counts are carried out by staff and volunteers who conduct surveys allowing people experiencing homelessness to express their specific housing status and needs. This data is then entered into HMIS and/or DV ClientTrack to be collected for the PIT Count.

The **Housing Inventory Chart (HIC)** is a nationwide inventory of provider programs within a CoC that provide beds and units dedicated to serve people experiencing homelessness categorized by five project types: Emergency Shelter; Transitional Housing; Rapid Re-Housing; Safe Haven; and Permanent Supportive Housing.

All data recorded for the PIT and HIC are entered and recorded in HMIS and/or DV ClientTrack. As stated in the **HMIS** section of the manual, it is essential that subrecipients include a **"housing move in date"** into HMIS and/or DV ClientTrack (among other data); this data point is directly used for the PIT and HIC.

Questions about how to participate in your regional PIT and HIC can be directed to your regional **PIT Coordinator**. More information about the PIT and HIC can be found [here](#) on the IHCD Website.

**PIT & HIC Resources:**

- [Indiana Balance of State Regional Map](#)

- List of regional PIT Coordinators
- “Housing Move in Date” How-To-Guide
- Data Quality Plan

## Grant Closeout

Once all funds have been spent, TANF RRH/HP subrecipients are required to close out their grant. The closeout process consists of several components:

- All funds expended
- Final claim submission
- CAPER data quality report

Email the completed CAPER to the **TANF Analyst** on or before **June 30<sup>th</sup>, 2025**. Any funds that are not expended will be recaptured.



# **Program Administration**

This section of the manual provides subrecipients with the specifics of administering the TANF program. This will include program participant eligibility and eligible costs under each program component.

## **Program Participant Eligibility**

Eligible households must meet the following criteria for TANF RRH/HP funding:

- Are U.S. citizens or legal U.S. residents, residing in Indiana **AND**
- Include parent(s), grandparent(s) or caregiver(s) to a child(ren) under the age of eighteen (18) (under age nineteen (19) if still a full-time student); or include an expectant parent, or be a dependent child in the household of a parent or guardian who meets the criteria; **AND**
- The family's household income is at or less than 200% of the current federal poverty level (FPL), verified by the most recent thirty (30) days of income; **AND**

### **For Short-term Rapid Re-Housing:**

- Are experiencing homelessness; in an emergency shelter or in a place not meant for human habitation (HUD category 1 definition of homelessness);
- OR**
- Are fleeing/attempting to flee domestic violence, have no other residence, and lacks the resources or support networks to obtain permanent housing (HUD category 4 definition of homelessness)

### **For Homeless Prevention:**

- Are at imminent risk of homelessness; at risk of eviction without resources to obtain ongoing housing (HUD category 2 definition of imminent risk of homelessness)
- OR**
- Are fleeing/attempting to flee domestic violence, have no other residence, and lacks the resources or support networks to obtain permanent housing (HUD category 4 definition of homelessness)

Subrecipient providers are responsible for verifying the eligibility of all households participating in the program. Required documents and forms that verify participant eligibility can be found under **Addendum B** – Client Files (Acceptable Supporting Documentation)

## Program Eligible Costs

The following are the eligible program components and costs for **BOTH** short-term Rapid Re-Housing **and** Homeless Prevention services under TANF:

### Financial Assistance

- **Security Deposit** - TANF funds may pay for a security deposit that is equal to no more than 2 months' rent.
- **Last Month's Rent** - If necessary to obtain housing for an eligible household, last month's rent may be paid to the owner of the housing unit using TANF funds. This assistance must not exceed one month's rent.
- **Utility Deposit** - TANF funds may pay for a standard utility deposit required by the utility company for all customers. Deposits may be paid for the following utilities: gas, electric, water, and sewage.
- **Utility Payments** - TANF funds may pay for up to 4 months of utility payments for an eligible household, per service type. Eligible utility services are gas, electric, water, and sewage. Utility arrears are included in the maximum of 4 months' worth of assistance.
- **Utility Arrears** - TANF funds may pay for a one-time payment of utility arrears that equals no more than 4 months of service per utility type.  
**Example:** Nonprofit assists a family with 2 months of electric utility arrears + 2 months of current electric utility bills = 4 months of utility assistance. Or any other combination that does not exceed 4 months of assistance.

### Rental Assistance

- **Rental Payments** - TANF funds may pay for up to 4 months of current or future rental payments per eligible household, including up to 4 months of rental payments in arrears and/or first month's rent.
- **Rental Arrears** - TANF funds may pay for rental arrears consisting of a one-time payment for up to 4 months of rent, including any late fees on those arrears.  
**Example:** Nonprofit assists a family with 3 months of rental arrears + 1 month of current rent = 4 months of rental assistance. Or any other combination that does not exceed 4 months of assistance.

### Financial Services (Direct Program Expenses)

Include but are not limited to:

- Salaries and benefits for staff providing program services to clients
- Case management expenses

- Costs providing screening and assessments
- Development of employment plans, work activities, post-employment services, work supports
- Costs providing diversion benefits
- Costs for contracts of activities (listed above)
- Direct cost of supplies, equipment, travel expenses, postage to mail clients, seminars, classes, group sessions, non-medical counseling, etc. for program
- Utilities, rental, and maintenance costs of office where clients are served
- Direct outreach event to target population

**Administrative Costs (Indirect Program Expenses)** – 10% of total budget

Include but are not limited to:

- Administrative contract costs or indirect overhead costs
- Activities related to eligibility determination
- Salaries for staff performing admin, payroll, and/or accounting functions
- Costs of goods/services required for admin of program (supplies, postage, equipment, etc.)
- Preparation of program plans, budgets, schedules, etc.
- Monitoring of vendors for program
- Services related to accounting, litigation, audits, property management, etc.

**\*\*All rent, and utility assistance cannot exceed 4 months of payments AND must be in the name of the recipients receiving funds \*\***

## Program Administration Requirements

The following section of the Manual outlines specific administrative requirements that all funded subrecipients are required to have established within their agency and uphold throughout the TANF RRH/HP Program.

### IHCDA Policy Requirements

Subrecipients are required to have specific policies and procedures in place related to agency operations, program administration, Rapid Re-Housing + Homeless Prevention, and client services.

**Addendum A** outlines and describes the specific policies and procedures subrecipients are required to document in writing and implement within the TANF Program.

### HUD Policy Requirements

Subrecipients must comply with the requirements set forth in **HUD's Equal Access Rule** detailed below:

#### ***Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities***

On February 3, 2012, HUD published the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity final rule (Equal Access Rule) (77 FR 20 5662). This final rule requires that HUD's housing programs be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines "gender identity" to mean "actual or perceived gender-related characteristics." 24 CFR 5.100; 77 FR at 5665. The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing. The rule does not, however, prohibit voluntary self-identification of sexual orientation or gender identity, and it provides a limited exception for inquiries about the sex of an individual to determine eligibility for temporary, emergency shelters with shared sleeping areas or bathrooms, or to determine the number of bedrooms to which a household may be entitled. 24 CFR 5.105(a)(2).

#### ***HUD Guidance for Single-Sex Emergency Shelters or Other Facilities that Receive TANF, HOPWA, or CoC Funds***

##### *Assignments*

HUD assumes that a recipient or subrecipient ("provider") that makes decisions about eligibility for or placement into single-sex emergency shelters or other

facilities will place a potential client (or current client seeking a new assignment) in a shelter or facility that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. A client's or potential client's own views with respect to personal health and safety should be given serious consideration in making the placement. For instance, if the potential client requests to be placed based on his or her sex assigned at birth, HUD assumes that the provider will place the individual in accordance with that request, consistent with health, safety, and privacy concerns. HUD assumes that a provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client's non-conformance with gender stereotypes.

#### *Appropriate and Inappropriate Inquiries Related to Sex*

For temporary, emergency shelters with shared sleeping areas or bathrooms, the Equal Access Rule permits shelter providers to ask potential clients and current clients seeking a new assignment their sex. Best practices suggest that where the provider is uncertain of the client's sex or gender identity, the provider simply informs the client or potential client that the agency provides shelter based on the gender with which the individual identifies. There generally is no legitimate reason in this context for the provider to request documentation of a person's sex in order to determine appropriate placement, nor should the provider have any basis to deny access to a single-sex emergency shelter or facility solely because the provider possesses identity documents indicating a sex different than the gender with which the client or potential client identifies. The provider may not ask questions or otherwise seek information or documentation concerning the person's anatomy or medical history. Nor may the provider consider the client or potential client ineligible for an emergency shelter or other facility because his or her appearance or behavior does not conform to gender stereotypes.

#### *Privacy*

If a client expresses safety or privacy concerns, or if the provider otherwise becomes aware of privacy or safety concerns, the provider must take reasonable steps to address those concerns. This may include, for example: responding to the requests of the client expressing concern through the addition of a privacy partition or curtain; provision to use a nearby private restroom or office; or a separate changing schedule. The provider must, at a minimum, permit any clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility. The provider should, to the extent feasible, work with the layout of the facility to provide for privacy in bathrooms and dressing areas. For example, toilet stalls should have doors and locks and there should be

separate showers stalls to allow for privacy. The provider should ensure that its policies do not isolate, or segregate clients based upon gender identity.

*Example as it relates to Domestic Violence Providers*

A recipient that operates a sex-segregated or sex-specific program should assign a beneficiary to the group or service which corresponds to the gender with which the beneficiary identifies, with the following considerations. In deciding how to house a survivor, a recipient that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the survivor's health and safety. A survivor's own views with respect to personal safety deserve serious consideration. The recipient should ensure that its services do not isolate, or segregate survivors based upon actual or perceived gender identity. A recipient may not make a determination about services for one beneficiary based on the complaints of another beneficiary when those complaints are based on gender identity.

**Violence Against Women Reauthorization Act (VAWA) of 2013**

The following requirements apply to emergency shelters funded under §576.102:

- No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

The terms "affiliated individual," "dating violence," "domestic violence," "sexual assault," and "stalking" are defined in 24 CFR 5.2003.

# Addendums

## Addendum A - Required Policies and Procedures

To ensure program compliance, subrecipients are required to document in writing and implement the following policies and procedures. Within a full monitoring, IHCD compliance monitors will verify that subrecipients have the following policies and procedures on file.

Name of Policy Document	Required Language Within Policy
<b>Agency Policies</b>	
<b>Drug-free Workplace Policy</b>	Policy should specify compliance with drug-free workplace and outline consequences (up to and including termination) of violating it.
<b>Non-discrimination Policy</b>	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.
<b>Homeless Representation Policy (CoC required, ESG preferred)</b>	Signed certification that organization has homeless representation on board of directors OR waiver from HUD allowing alternate arrangements.
<b>Programmatic Policies</b>	
<b>Housing First</b>	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.
<b>Coordinated Entry Policy</b>	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....)
<b>Equal Access Policy</b>	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.
<b>Affirmatively Furthering Fair Housing</b>	This policy speaks to an organization's approach to preventing discrimination, reaching out to potentially overlooked subpopulations, and making services accessible to all. (Reference 24 CFR 576.407(b) and 24 CFR 5.150-152.)
<b>RRH/HP Manual Required Policies</b>	
<b>Confidentiality Policy</b>	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.
<b>Client Grievance and Termination Policy</b>	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. (See 24 CFR 576.402 for reference.)
<b>Maintenance of Records Policy</b>	Policy requiring records maintained for a minimum of three years after grant closeout
<b>Client/Service Policies</b>	
<b>Homeless Verification &amp; Documentation Policy</b>	This must stipulate how and when status is verified, prioritization for verification (3 <sup>rd</sup> -party reference then intake worker confirmation then client self-attestation of status).
<b>Order of Priority for Chronically Homeless Individuals and Families</b>	The policy must establish that chronic homelessness, longest stays in homelessness, and the most vulnerable are prioritized first.
<b>Client Grievance &amp; Termination</b>	See description up above under "RRH/HP Manual Required Policies".
<b>VAWA Requirements Policy</b>	Please adopt the exact language from <b>HUD Form 5380</b> .
<b>Lead-Based Paint Policy</b>	This policy should describe the requirement of completing the <b>Lead-Based Paint Exemption Form</b> 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 <b>Lead-Based Paint Disclosure Form</b> and an LBP Ongoing Maintenance Agreement. The policy may also mention the distribution of HUD's informational document – <b>Lead-based Paint Protection Resource</b>

## Addendum B - Client Files (Required Documents)

The chart below outlines the required documentation Subrecipients must maintain in the client files for all TANF Program participants. If monitored by IHCD, the compliance monitor will either view the compliance item in HMIS/DV ClientTrack or request a digital copy. Subrecipients are expected to provide requested documents within a few business days.

Client File Documentation	
Compliance Item	Acceptable Forms of Documentation
<p><b>Coordinated Entry (CE) Referral</b>                      (Required if using TANF as match for RRH)  <b>OR</b>  <b>Internal Selection Process</b>                      (Required if NOT using TANF as match)</p>	<p>Provide <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>• CE referral form with VI-SPDAT score (up to Oct. 29<sup>th</sup>, 2024)</li> <li>• CE referral form with CHAT score (On Oct. 30<sup>th</sup>, 2024, and thereafter)</li> </ul> <p style="text-align: center;"><b>OR</b></p> <p>Documentation verifying that client was selected through internal selection process.</p>
<p><b>Proof of client's U.S. citizenship or legal U.S. residence</b>  <a href="#">IC 12-14-2.5-1</a>  <a href="#">8 USC 1641 (b)</a>  <a href="#">8 USC 1612</a>  <a href="#">8 USC 1613</a></p>	<p>Provide <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>• Original birth certificate demonstrating client born in U.S.</li> <li>• U.S. Passport</li> <li>• Certificate of U.S. Citizenship or Naturalization</li> <li>• Unexpired U.S. permanent resident card (green card)</li> <li>• SSA Records</li> <li>• Form FS-545</li> <li>• Form I-197</li> <li>• County Department of Health birth records</li> <li>• Form FS-240</li> <li>• Form I-97</li> <li>• Form 179</li> <li>• Census indicating age and citizenship</li> <li>• Signed self-attestation form (fraud disclaimer) and signature</li> <li>• Case manager attestation</li> </ul>
<p><b>Proof of dependent child's U.S. citizenship or legal U.S. residence</b></p>	<p>Refer to cell directly above for acceptable forms of documentation.</p>
<p><b>Social Security Number (SSN)</b>  <a href="#">45 CFR 205.52</a></p>	<p>Request SSN for each member of the household and record the SSN as part of intake in HMIS/DV ClientTrack.</p>
<p><b>Proof of Indiana Residency</b>  <a href="#">45 CFR 233.40</a></p>	<p>Provide <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>• Unexpired Indiana driver's license</li> <li>• Unexpired Indiana ID card</li> <li>• Employment records</li> <li>• Religious records</li> <li>• Local postal record</li> <li>• Rent/mortgage receipts and/or utility bills</li> <li>• Bank statement</li> <li>• Pre-printed pay stub</li> <li>• Medicaid or Medicare benefit statement</li> </ul> <p><b>In the event no written documentation is available, a collateral contact may be used for verification:</b></p> <ul style="list-style-type: none"> <li>• Landlord</li> <li>• Neighbor</li> <li>• Utility company</li> </ul>



	<ul style="list-style-type: none"> <li>• School</li> <li>• Shelter manager</li> <li>• Employer</li> </ul>
<b>Proof of dependent child being in client's custody</b>	<p>Provide <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>• Original birth certificate that attests to parent-child connection between client and dependent child</li> <li>• Physician, marriage, court or adoption records</li> <li>• Passport</li> <li>• Immigration records</li> <li>• SSA records</li> <li>• Adoption certificate</li> <li>• School or religious documentation</li> <li>• Records of social agencies (local offices)</li> <li>• Third-party attestation (not related to child)</li> <li>• I-94 (for refugee or eligible non-citizen applicants)</li> </ul>
<b>Proof of Homelessness</b> <b>OR</b> <b>Proof of At Risk of Homelessness</b>	<p>Provide the following:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>Homeless Documentation Form</u></a></li> <li>• 3<sup>rd</sup> party reference confirming client's homeless status.</li> </ul> <p style="text-align: center;"><b>OR</b></p> <p>Provide the following:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>At Risk of Homelessness Documentation Form</u></a></li> <li>• 3<sup>rd</sup> party reference confirming client's at risk of homeless status.</li> </ul>
<b>Income Eligibility</b> (Income must be at or below <b>200%</b> of FPL) <a href="#"><u>2024 Federal Poverty Guidelines</u></a>	<p>Provide <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>• Completed <a href="#"><u>Income Eligibility Worksheet</u></a></li> <li>• Your agency's documentation of household income calculation</li> <li>• <a href="#"><u>Zero Income Affidavit</u></a>, if household has no income</li> </ul> <p style="text-align: center;"><b>AND</b></p> <ul style="list-style-type: none"> <li>• Official/credible income source documents, if household has income</li> </ul>
<b>Intake Assessments</b>	This is completed in HMIS/DV ClientTrack through the program intake workflow.
<b>Coordinated Entry (CE) Consent Form</b> (Only required if using TANF as match for RRH)	This is completed in HMIS through the CE intake workflow.
<b>Program Agreement</b>	The Program Agreement is an internal document from your organization. The client must sign and date the Program Agreement.
<b>Grievance &amp; Termination Policies</b>	The grievance & termination policies may appear as a separate form or as part of the above Program Agreement.
<b>Rent Reasonable &amp; Fair Market Rent Valuations</b>	Use <a href="#"><u>affordablehousing.com</u></a> to generate a Rent Reasonable Valuation PDF. Use <a href="#"><u>HUD FMR Documentation System</u></a> to generate a FMR Valuation PDF. Maintain these PDFs in client's file.
<b>Housing Quality Standards Inspection</b> <a href="#"><u>24 CFR 576.403(c)</u></a>	<a href="#"><u>HUD HQS Inspection Checklist</u></a>
<b>Lead-based Paint (LBP) Exemption Form</b>	<a href="#"><u>Lead-based Paint Exemption Form</u></a>
<b>LBP Disclosure</b> (if lead is found in home)	<a href="#"><u>Lead-based Paint Disclosure Form</u></a>

<b>LBP Ongoing Maintenance Agreement</b> <i>(if lead is found in home)</i>	This will be an internal document from your organization.
<b>Lease (Executed)</b>	This document will come from the landlord or leasing company.
<b>Request for Unit Approval Form</b> <i>(only for RRH)</i>	<u><b>Request for Unit Approval Form</b></u>
<b>Rapid Re-Housing RAP Contract</b> <b>OR</b> <b>Homelessness Prevention RAP Contract</b>	<u><b>RAP Contract – Rapid Re-Housing</b></u> <u><b>RAP Contract – Homeless Prevention</b></u>
<b>Case Management Notes</b>	Notes from monthly case management meetings maintained within HMIS/DV ClientTrack. Subrecipients can choose the style/format of these notes.
<b>“Services” Notations</b>	Per <u>24 CFR 576.500(f)(1)</u> , record services provided to client in HMIS/DV ClientTrack.
<b>Exit Assessment</b>	This is completed in HMIS/DV ClientTrack when the client has stopped receiving TANF assistance.

## Addendum C - Claims (Acceptable Supporting Documentation)

The chart below outlines the supporting documentation needed for claim submissions. For every eligible expense a Subrecipient is claiming, they are **REQUIRED** to provide **proof of cost incurred** and are **STRONGLY ENCOURAGED** to provide **proof of cleared payment**.

Fully complying with the supporting documentation requirements will reduce the likelihood of a Subrecipient's claims being denied and will help assure Subrecipients are reimbursed promptly.

	<b>REQUIRED</b>	<b>STRONGLY ENCOURAGED</b>
<b>Eligible Expense</b>	Acceptable Documents for Proving <b>Cost Incurred</b>	Acceptable Documents for Proving <b>Cleared Payment</b>
<b>Rental Assistance</b>		
<b>Rental Payments</b>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Copy of lease detailing charge for rent, security deposit, or last month's rent</li> <li>• Official written communication from landlord indicating charge for: rent, security deposit, or last month's rent</li> </ul>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Copy of cancelled check</li> <li>• Copy of online payment indicating landlord/business name, payment amount, date of payment</li> <li>• Copy of bank statement that details: landlord/business name, payment amount, date of payment</li> <li>• Copy of landlord receipt</li> </ul>
<b>Rental Arrears</b>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Rental ledger with landlord letterhead (ideally w/ recent timestamp)</li> <li>• Email or other written communication from landlord indicating need to pay arrears</li> </ul>	
<b>Financial Assistance</b>		
<b>Security Deposit</b>  <b>Last Month's Rent</b>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Copy of lease detailing charge for rent, security deposit, or last month's rent</li> </ul> <p>Official written communication from landlord indicating charge for: rent, security deposit, or last month's rent</p>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Copy of cancelled check</li> <li>• Copy of online payment indicating landlord/business name, payment amount, date of payment</li> <li>• Copy of bank statement that details: landlord/business name, payment amount, date of payment</li> <li>• Copy of landlord receipt</li> </ul>
<b>Utility Payments</b>	<p><u>Provide <b>ONE</b> of the following:</u></p> <ul style="list-style-type: none"> <li>• Invoice / bill / billing statement</li> <li>• Screenshot of utility website indicating client name, date of utility services, &amp; payment due</li> </ul>	

<b>Utility Arrears</b>  <b>Utility Deposit</b>	<u>Provide <b>ONE</b> of the following:</u> <ul style="list-style-type: none"> <li>• Itemized invoice with clear indication of utility deposit or utility arrears</li> <li>• Written communication from utility company indicating deposit or arrear amounts</li> </ul>	<ul style="list-style-type: none"> <li>• Copy of bank statement that details: utility company name, payment amount, date of payment</li> <li>• Copy of utility company receipt</li> </ul>
<b>Financial Services</b>		
<b>Direct Program Expenses</b>	<u>Provide <b>ONE</b> of the following:</u> <ul style="list-style-type: none"> <li>• Invoice</li> <li>• Itemized receipt</li> <li>• Individual employee or master timesheet indicating employee/contractor name, # of hours worked, dates for those hours, and project</li> </ul>	<u>Provide <b>ONE</b> of the following:</u> <ul style="list-style-type: none"> <li>• Itemized receipt</li> <li>• Copy of online payment indicating company name, payment amount &amp; date of payment</li> <li>• Copy of bank statement that details: company name, payment amount, date of payment &amp; client name</li> <li>• Paystub/earning statement indicating employee/contractor name, pay period, pay date, &amp; hourly rate (if applicable)</li> <li>•</li> </ul>
<b>Administration</b>		
<b>TANF Eligibility Determinations</b> <a href="#">45 CFR 263.0(b)(2)(ii)</a>	<u>Provide the following:</u> <ul style="list-style-type: none"> <li>• Individual employee or master timesheet indicating employee/contractor name, # of hours worked, dates for those hours, and project (TANF)</li> </ul>	<u>Provide the following:</u> <ul style="list-style-type: none"> <li>• Paystub/earning statement indicating employee/contractor name, pay period, pay date, &amp; hourly rate (if applicable)</li> </ul>
<b>Other Indirect Expenses</b>	<u>Provide <b>ONE</b> of the following:</u> <ul style="list-style-type: none"> <li>• Invoice</li> <li>• Itemized receipt</li> <li>• Individual employee or master timesheet indicating employee/contractor name, # of hours worked, dates for those hours, and project</li> </ul>	<u>Provide <b>ONE</b> of the following:</u> <ul style="list-style-type: none"> <li>• Itemized receipt</li> <li>• Copy of online payment indicating company name, payment amount &amp; date of payment</li> <li>• Copy of bank statement that details: company name, payment amount, date of payment &amp; client name</li> <li>• Paystub/earning statement indicating employee/contractor name, pay period, pay date, &amp; hourly rate (if applicable)</li> <li>•</li> </ul>

**\*\*\*If a Subrecipient is monitored, they will be required to provide both proof of COST INCURRED AND proof of CLEARED PAYMENT. \*\*\***