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# COVID-19 RELIEF FUND (CRF)

## DESK GUIDE

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*Strength, Dignity, Quality of Life*  
**MISSOURI HOUSING**  
DEVELOPMENT COMMISSION



**EQUAL HOUSING  
OPPORTUNITY**

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## Introduction

### Purpose

The COVID-19 Relief Fund (CRF) is intended to assist Missouri communities impacted by the COVID-19 pandemic. CRF funds should be utilized to quickly identify and assist low-to-moderate income households that have either become homeless or are at risk of becoming homeless due to the economic impact of COVID-19.

### Eligibility Requirements

#### ***COVID-19 Pandemic***

CRF Funds became available in response to the 2020 COVID-19 Pandemic and resulting economic impact on households in the state of Missouri and the federally declared disaster.

#### ***Income***

All CRF funds must be used to serve households at or below 140 percent of the Area Median Income (AMI). The AMI for each county in Missouri is defined by the Department of Housing and Urban Development (HUD). Form CRF-213 Maximum Income Limits provides the current CRF AMI to be utilized and is available on the MHDC website.

[http://www.mhdc.com/ci/covid19\\_relief/Covid19\\_relief.htm](http://www.mhdc.com/ci/covid19_relief/Covid19_relief.htm)

#### ***Housing Status***

Those assisted with CRF funds must be financially impacted by the COVID-19 pandemic. This can include, but is not limited to becoming ill with COVID-19 or losing a source of income as a result of becoming furloughed or laid off during the pandemic. This can lead to additional financial assistance becoming necessary in order to maintain or obtain housing. Funds are intended to assist those who are currently homeless, at risk of becoming homeless, or fleeing domestic violence.

*In the case of COVID-19 Relief funding, employees or family of employees who otherwise qualify, are eligible to receive COVID-19 Relief Funds. Agencies are expected to treat employees or family members receiving assistance the same as all other citizens receiving assistance.*

## Description of Grant Activities

### ***Housing Assistance***

Housing Assistance is intended for individuals and families who are literally homeless, at risk of becoming homeless\*, or fleeing/attempting to flee domestic violence. With the exception of providing households with essential supplies and arrears, there is no limit on the amount of assistance that grantees can provide to households during the grant period, however, grantees should have a consistent assessment process in place along with policies and procedures to determine the extent of a household's need and how the housing intervention determination is being applied to all clients.

*\*In the case of CRF funding, an individual receiving housing assistance is considered to be “at risk” of homelessness at the time of an eviction or utility shut off notice. However, a household can receive services such as essential supplies without an eviction or utility shut off notice.*

## **Operations: Outreach and Casework**

COVID-19 Relief Fund grantees can bill the CRF grant for operations expenses necessary to the administration of CRF. This includes CRF-focused outreach efforts and case-work.

## General Information

### Contacts

Below are the MHDC – CRF contacts for funded agencies. Please direct all questions, concerns, updates and submission of documents to the Community Initiatives Grant Administrator, with the exception of Payment Requests, which shall be submitted electronically through your agency portal in the online Grant Interface. Payment Requests sent anywhere else will not be accepted.

#### **Please direct questions, concerns, and updates to:**

Cassie Wilson  
Grants Administrator  
[cassie.wilson@mhdc.com](mailto:cassie.wilson@mhdc.com)  
(816) 759-7236

#### **Please submit Payment Requests electronically to:**

<https://www.grantinterface.com/Home/Logon?urlkey=mhdc>

### Website

All information and forms pertaining to the CRF program can be found on the MHDC website at:

[http://www.mhdc.com/ci/covid19\\_relief/Covid19\\_relief.htm](http://www.mhdc.com/ci/covid19_relief/Covid19_relief.htm)

## Financial Processes

### Request for Payment

CRF funds are provided on a reimbursement basis\*, therefore CRF funds must be expended on eligible activities for eligible program participants before funds can be requested. All grant documents must be completed before funds can be requested.

To submit, funded agencies must log into their Agency Profile on MHDC’s online Grant Interface and fill out the payment request for the respective submission month. All fields must be fully filled out on the online form and the following must be attached:

- *Expense Detail Forms (for expenses that do not appear on MIS report e.g. salaries, essential supplies)*
- *MIS Report*

Please reference the COVID-19 Payment Request Process located on the website for detailed instruction on how to submit through the Grant Interface Portal.

\*If your agency expressed a hardship and was approved to have funds fronted, please reference Appendix C.

### ***Incomplete/Ineligible Requests for Payment***

If the grantee submits a Payment Request that is incomplete/ineligible, the program contact will be notified via email that there is feedback regarding their submission in their agency profile. Grantee will need to resolve all feedback and re-submit the payment request for a second review. No funds will be disbursed until all feedback is resolved.

### ***Common Reasons for Feedback on Payment Requests***

- Certificate of insurance has expired
- Incorrect files uploaded
- Ineligible expenses listed
- Expenses billed outside of funding period
- Uploaded PDFs are illegible

## Funding Period

All CRF funding provided to grantees must be used for expenses that are incurred, paid, and submitted for payment to MHDC during the Grant Funding Period as defined in the Grant Agreement.

## Submission Requirements

Funded agencies may submit Payment Requests electronically through their agency profile at the following link:

<https://www.grantinterface.com/Home/Logon?urlkey=mhdc>

## Housing Assistance

### Eligible Activities

#### ***Security Deposits***

Funds may be used to pay for security deposit that is less than or equal to two months' rent.

## ***Rental Arrears***

A one-time payment of up to six months of rental arrears may be provided on behalf of households in need. Arrears can include late fees accrued by the household. Late fees resulting from grantee's failure to pay rent on behalf of a household by the deadline is not considered an eligible use of the grant. Grantees are encouraged to assist participants to establish payment plans and negotiate reduced arrears if possible. Rental Arrears in excess of six months are considered to be ineligible for reimbursement.

## ***Rental Assistance***

Grantees may provide monthly rental assistance payments on behalf of eligible households. The purpose of the grant is to provide assistance to stabilize households that have no other resources and supports to pay their monthly rent amount.

## ***Mortgage Assistance***

Grantees may provide monthly mortgage assistance payments on behalf of eligible households. The purpose of the grant is to provide assistance to stabilize households that have no other resources and supports to pay their monthly mortgage amount.

## ***Rental and Mortgage Arrears***

Up to six months of arrears for unpaid rent or mortgage may be provided to households in need. Arrears can include late fees accrued by the household. Late fees resulting from grantee's failure to pay mortgage or rent on behalf of a household by the deadline is not considered an eligible use of the grant. Grantees are encouraged to assist participants establish payment plans and negotiate reduced arrears if possible. Mortgage and rental arrears in excess of six months are considered to be ineligible for reimbursement.

## ***Last Month's Rent***

If necessary to obtain housing for a program participant, the last month's rent may also be paid on behalf of the household at the time the first month's rent is paid. The last month's rental assistance cannot exceed one month's rent.

## ***Utility Deposits***

Funds may be used to pay for standard utility deposits for gas, electric, water, sewage, primary phone, or internet.

## ***Utility Arrears***

Up to six months of arrears for unpaid gas, electric, water, internet, primary phone, and sewage may be provided to households in need. Arrears can include late fees accrued by the household. Late fees resulting from grantee's failure to pay utilities on behalf of a household by the deadline is not considered an eligible use of the grant. Grantees are encouraged to assist participants establish payment plans and negotiate reduced arrears if possible. Utility Arrears in excess of six months are considered to be ineligible for reimbursement.

***Utility Assistance***

Utility assistance for gas, electric, water, sewage, primary phone, and internet may be provided on behalf of eligible households. Expenses deemed non-essential (i.e., cable television, etc.) are considered ineligible for reimbursement.

***Hotel/Motel Voucher***

Where no appropriate emergency shelter is available for a homeless individual or family, grantee may provide hotel or motel voucher. It is the expectation that grantee work with household to create a housing stabilization plan as well as to ensure household's service and housing needs are addressed.

***Essential Supplies***

Limited to one instance of assistance per household per month, Grantee can provide essential supplies limited to the following items:

- Baby care items
- Hygiene items
- Groceries

Costs associated with the delivery of such supplies is eligible for reimbursement.

**Ineligible Housing Assistance Activities**

***Rental or mortgage arrears in excess of six months***

***Utility arrears in excess of six months***

***Expenses that are non-necessities (e.g., cable television, etc.)***

***Late fees***

**Households with Rental Subsidies**

Households that receive a tenant-based or project-based rental subsidy are eligible to be assisted with their portion of their monthly rent amount only if they have no other resources, they are literally homeless or at imminent risk of homelessness. Households with rental subsidies can be assisted with arrears, security deposits, and utility payments/deposits regardless of the aforementioned criteria.

## 90-Day Recertification

The purpose of the CRF grant is to provide ongoing support to participants in order to achieve housing stability. The Income Verification Worksheet (CRF-212) and verification of sources of income should be completed at initial intake and updated every 90 days thereafter. At recertification, the sources of income should be current within 30 days. At recertification, grantees need to evaluate households assisted for both need and eligibility, including:

1. Determination of whether or not the household composition has changed; and
2. Verification that household’s annual gross income does not exceed 140 percent of AMI; and  
Verification that the household lacks sufficient resources and support networks to retain housing without CRF assistance.

## Recordkeeping Requirements – Housing Assistance & Services

Record	Criteria	Acceptable Forms of Documentation
Consent Form	<ul style="list-style-type: none"> <li>• Permits MHDC to review client file</li> <li>• Verifies safe, decent and sanitary housing</li> </ul>	<ul style="list-style-type: none"> <li>• MHDC form CI-108 or CI-108DV* are the <b>only</b> acceptable form of documentation</li> <li>• Signed by the head of household within 30 days of first instance of assistance.</li> </ul>
Housing Status/Proof of need	<ul style="list-style-type: none"> <li>• Documentation of household’s current living situation</li> <li>• Documentation of the amounts/types of assistance needed for the household to gain stability in permanent housing as well as lack of other supports or resources to assist. Include the number of months of rental or utility arrears included in the assistances.</li> <li>• Documentation of benefits received from other COVID-19 relief funding sources</li> </ul>	<ul style="list-style-type: none"> <li>• MHDC form <b>CI-105</b>. Self-Certification of housing status by head of household.</li> <li>• Letter from Emergency Shelter, hospital, or other institution</li> <li>• <b>Eviction and/or utility shut-off notice</b></li> <li>• Copy of lease agreement or bill</li> <li>• COVID-19 Relief Eligibility Certification (<b>CRF-203</b>)*</li> <li>• Non-Duplication of Benefits Certification (<b>CRF-202</b>)</li> </ul>
Income Worksheet	<ul style="list-style-type: none"> <li>• Details household’s annual income for program eligibility</li> </ul>	<ul style="list-style-type: none"> <li>• CRF-212 Income Verification Summary Worksheet</li> </ul>
Supporting Documentation of Sources of Income	<ul style="list-style-type: none"> <li>• Verification of proof of gross annual income is needed for all members of the household age 18 and over</li> </ul>	<ul style="list-style-type: none"> <li>• Pay stubs, SSI/SSDI award letter/print out, child support statement, EBT statement for TANF</li> <li>• CI-112 Employer Verification may be utilized only if the source documentation listed above is unobtainable; must be accompanied by documentation of attempts to obtain source documentation</li> <li>• CI-103 Self Declaration of Income may be utilized for those self-employed</li> <li>• CI-109 Certification of Zero Income may be utilized for those in the household 18 and over that have no income</li> </ul>



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Photo ID	<ul style="list-style-type: none"> <li>Required for all members of the household age 18 and over</li> </ul>	<ul style="list-style-type: none"> <li>Driver's license, state ID, temporary ID/license, school ID with photo, passport – U.S. or foreign, U.S. passport card, permanent resident card, etc.</li> </ul>
Social Security Identification	<ul style="list-style-type: none"> <li>Card/number needed for all members of the household</li> </ul>	<ul style="list-style-type: none"> <li>Social Security, print out from social security office</li> </ul>
Initial Consultation Documentation	<ul style="list-style-type: none"> <li>Documentation of agency's initial intake</li> </ul>	<ul style="list-style-type: none"> <li>Internal agency form</li> <li>Case notes, etc.</li> <li>CRF-201 Data Collection Form</li> </ul>
Lease	<ul style="list-style-type: none"> <li>Households assisted with rental assistance must have a written lease for the rental unit</li> </ul>	<ul style="list-style-type: none"> <li>Copy of signed, written lease between program participant and landlord</li> </ul>
Proof of Home Ownership	<ul style="list-style-type: none"> <li>Households assisted with mortgage assistance or arrears must have proof of home ownership.</li> </ul>	<ul style="list-style-type: none"> <li>Copy of deed</li> </ul>
Case Work Documentation	<ul style="list-style-type: none"> <li>Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability</li> </ul>	<ul style="list-style-type: none"> <li>Notes must be dated and detail housing goals, plans, referrals, etc.</li> </ul>
Proof of Payment for Direct Financial Assistance	<ul style="list-style-type: none"> <li>Payment must be made on or before deadlines stated in the lease or utility bill</li> </ul>	<ul style="list-style-type: none"> <li>Copy of cleared check; or</li> <li>Bank statement showing cleared CRF payment</li> </ul>
Proof of Client Contribution (if applicable)	<ul style="list-style-type: none"> <li>Grantees requiring households to contribute towards monthly rent must document the household's payment</li> </ul>	<ul style="list-style-type: none"> <li>Copy of check, money order or receipt from landlord showing amount and date paid</li> </ul>

*\*All consent forms and affidavits are available with non-identifying information to be used if client is fleeing or attempting to flee domestic violence.*

## Operations Expenses

COVID-19 Relief Fund grantees can bill the CRF grant for operations expenses necessary to the administration of CRF.

### Eligible Activities

- Program Operations Costs
  - Salaries and benefits associated with staff engaged in grant and program administration
  - Administrative services contracted to outside parties, including maintenance activities, general legal, accounting and auditing services. Maintenance activities include routine, necessary, and minor measures to upkeep office space equipment and fixtures, and/or preventative measures to keep the building and its property functioning properly.
  - Office supplies and equipment

- Outreach
  - Salaries and benefits associated with staff engaged in CRF focused outreach efforts.
  - Mileage costs associated with assisting clients with CRF (e.g., transporting clients, meeting clients at home to conduct intakes, etc.)
- Casework
  - Salaries and benefits associated with staff
  - Case notes that document client interactions

## Ineligible Activities

- Conference costs
- Training costs
- Food purchases
- Emergency shelter supplies
- Mileage costs when clients are not present and/or are not being assisted

## Operational Expenses Records to Maintain

Grantees requesting reimbursement for these types of expenses need to detail them in the Operation Expense Detail section of the Back-Up form. Supporting documentation for the expenses will be reviewed by MHDC’s Compliance Officer during compliance review. The chart below details the documentation requirements for administrative costs billed to CRF.

## Recordkeeping Requirements – Operational Expenses

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> <li>• Bills paid</li> <li>• Supplies purchased</li> <li>• Equipment purchased</li> </ul>	<ul style="list-style-type: none"> <li>• Invoice</li> <li>• Receipt</li> </ul>	<ul style="list-style-type: none"> <li>• Canceled checks, bank statement with CRF payments highlighted</li> </ul>
<ul style="list-style-type: none"> <li>• Mileage costs</li> </ul>	<ul style="list-style-type: none"> <li>• Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation</li> </ul>	<ul style="list-style-type: none"> <li>• Canceled checks, bank statement with CRF payments highlighted</li> </ul>
<ul style="list-style-type: none"> <li>• Employee Compensation</li> </ul>	<ul style="list-style-type: none"> <li>• Timesheets</li> <li>• Effort report</li> <li>• Pay stub listing pay periods, employee listed, last four digits of SSN</li> </ul>	<ul style="list-style-type: none"> <li>• Copy of pay stub</li> <li>• Bank statement with CRF payments highlighted</li> </ul>
Record	Criteria	Acceptable Forms of Documentation
Outreach	<ul style="list-style-type: none"> <li>• Identifying &amp; engaging households effected by the declared disaster</li> <li>• Assessing households needs</li> </ul>	<ul style="list-style-type: none"> <li>• Notes must be dated and detail housing goals, plans, referrals, etc.</li> <li>• CRF-201 Data Collection Form</li> <li>• <i>See mileage costs</i></li> </ul>

	<ul style="list-style-type: none"> <li>• Connecting households to appropriate resources</li> <li>• <i>See mileage costs</i></li> <li>• <i>See employee compensation</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>See employee compensation</i></li> </ul>
Casework	<ul style="list-style-type: none"> <li>• Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability</li> <li>• <i>See mileage costs</i></li> <li>• <i>See employee compensation</i></li> </ul>	<ul style="list-style-type: none"> <li>• Notes must be dated and detail housing goals, plans, referrals, etc.</li> <li>• CRF-201 Data Collection Form</li> <li>• <i>See mileage costs</i></li> <li>• <i>See employee compensation</i></li> </ul>

## Income Eligibility

All households assisted through the CRF are required to be at or below 140 percent of the Area Median Income (AMI). CRF grantees should use the CRF Area Median Income Limits form (CRF-213) in conjunction with the Income Verification Worksheet (CRF-212) to determine households' income eligibility. If the AMI for the county of service is lower than the Missouri state AMI, grantee shall use the AMI for the state to determine eligibility. The Area Median Income Limits are to be used throughout the entire grant year unless otherwise specified by MHDC. CRF bases its income calculation method from HUD's Handbook 4350.3, Chapter 5, Section 5-5; grantees should refer to this guidance for the correct calculation of income.

**Standard Forms of Income** Grantees are expected to utilize the list below when calculating a household's income.

### Inclusions:

- Income from all members of the household age 18 and over
- Gross wages from employment
- Full amount of periodic payments
- Unemployment Benefits, Worker's Compensation, Severance
- Entitlements (e.g., TANF, SSI, SSDI, etc.)
- Periodic and determinable allowances (alimony and child support)
- Net income from business operations
- Self-employment (e.g., child care, housekeeping, contracted work, etc.)
- Interest, dividends or other net income from personal property
- Unearned income from children under 18 years of age (i.e., benefits paid to adult member of household on behalf of a minor)

### Exclusions:

- Earned income from children under 18 years of age
- Foster care payments
- Lump sum payments
- Reimbursement or payment of medical expenses
- Income of live-in aide

- Financial Aid
- Resident service stipend (part-time work that enhances the quality of life – not to exceed \$200/month)
- Temporary, non-recurring income (gifts)
- Earnings over \$480 per year for full-time students 18 years and older (excluding Head of Household and spouse)
- Adoption assistance payments
- Amounts paid by state to household with a developmentally disabled child to keep them in the home
- Food Stamps, WIC Payments

**Additional Forms of Income** Grantees are expected to utilize the list below when calculating a household's assets. Income earned from the cash value of a household's assets should be included in the total income. If the net household's assets have a cash value of \$5,000 or over, annual income must include the greater of:

- The actual income from the assets; or
- Imputed income from the assets. (Impute income by multiplying total net household assets by the passbook rate specified by HUD. See HUD Handbook 4350.3: Chapter 5)

### **Inclusions:**

- A mortgage or deed of trust held by an applicant
- Cash held in savings and checking accounts, safe deposit boxes, home, etc.
- Cash value of revocable trusts
- Equity in rental property
- Cash value of stocks, bonds, treasury bills, CDs and money market accounts
- Individuals Retirement and Keogh Accounts
- Retirement and pension funds
- Cash value of life insurance policies
- Personal property held as an investment
- Lump sums not intended as periodic payments

### **Exclusions**

- Necessary personal property (e.g., clothing, furniture, antique cars, etc.)
- Interest in Indian Trust Lands
- Assets not effectively owned by applicant
- When assets are held in an individual's name, but the benefit is to someone that is not in the household
- Assets not accessible to and that provide no income
- Term life insurance policies
- Assets that are part of an active business

## Direct Assistance Timeframe

It is MHDC's expectation that CRF grantees serve eligible households in a timely manner. For Housing Assistance, a timely manner is considered financial assistance paid on behalf of the household within 30

days of the date of intake. In the event that grantee is unable to serve the household within the allotted timeframe, their file needs to be documented with an explanation of the factors that contributed towards not meeting this requirement.

## Termination and Grievance Procedures

All CRF grantees must have written policies in place that address termination and grievance procedures for program participants that violate program requirements. The policies should detail the program requirements, the termination process, and the grievance procedure for all clients served with CRF. The policies must also detail the timeline and method for notifying clients of their termination, as well as the process to allow clients to appeal the decision. When determining whether program violations merit termination, grantees should consider all extenuating circumstances in order to ensure that assistance is only terminated in the most severe situations. Termination does not prohibit the program from providing further assistance at a later date to the same individual or family. Policies should be retained by grantee and made available upon request by MHDC.

## Prioritizing Assistance

COVID-19 Relief Fund grantees should develop or update current written prioritization standards in relation to administration of its CRF grant(s). Program Guidelines should clearly detail policies and procedures for assessing eligibility for assistance and determining and prioritizing which eligible individuals and families will receive assistance. Program Guidelines should address grantee's unique eligibility requirements for assistance as well as the priority given to those most vulnerable or with the most severe housing needs.

## Monitoring

In order to track a grantee's program compliance with MHDC regulations, ensure accurate spending of CRF funds, prevent fraud and abuse, and identify technical assistance needs, MHDC staff may monitor grantees' by conducting on-site compliance reviews or desk reviews as well as through review of all financial documentation submitted to MHDC.

## Compliance Visits and Desk Audits

Traditionally, on-site compliance visits may be conducted at the location designated by the grantee. However, due to circumstances related to the COVID-19 pandemic, the compliance officer can also elect to perform an electronic desk audit. The MHDC Compliance Officer will review expenses billed to CRF. The information reviewed is gathered from the MIS reports, comparable database reports and Administrative Expense Detail forms submitted with the grantee's Back-Up. In the instance of an on-site compliance visit, the Compliance Officer will not provide the grantee the names of the files to be checked prior ; this is to ensure that all files will be reviewed in the state in which they are normally kept. In the case of a remote desk audit, some prior notice may be given to the agency so that they have time to scan and email the required documents to the compliance officer.

The requested files are expected to be produced within fifteen (15) minutes of the Compliance Officer's arrival during a site visit. Failure to produce requested files within fifteen (15) minutes will result in a compliance violation\*. Therefore, it is vital that a grantee staff member is always available to assist the MHDC staff member as needed at the location and during the times provided by grantee. The fifteen minute rule only applies to on-site compliance visits. The electronic monitoring procedures are available for review on MHDC's website.

\* The only exception is if a staff member is assisting a client.

### ***Announced Visit***

The announced site visit is scheduled by the Compliance Officer with the grantee. If MHDC staff is unsuccessful in scheduling a site visit after three attempts have been made via telephone and/or e-mail, MHDC staff will notify the grantee informing them that they have 15 days to schedule a site visit, otherwise their funding will be suspended and grantee will be considered out of compliance until the visit is scheduled.

### ***Unannounced Visit***

MHDC staff members have the right to conduct unannounced visits at the location(s) and times furnished by the grantee in the updated Site Contact Form (CI-102) or updated via email to Community Initiatives Grant Administrator. It is the grantee's responsibility to notify MHDC if business hours change or if the grantee will be closed for an extended amount of time. Unannounced site visits are conducted based on certain factors, including but not limited to, agency's prior history with CRF, outcome of announced visit, and fulfilling grant requirements such as timely and accurate submission of Requests for Payment. MHDC will not conduct site visits on state or federal holidays.

### ***Electronic Files***

If the grantee elects to maintain electronic files in lieu of paper files, the grantee will be required to print off all required documentation in the instance of an on-site compliance visit. As with all files, the time limit to produce these files is fifteen (15) minutes during a site visit.

### ***Exit Interview***

At the conclusion of the site visit, the Compliance Officer will discuss the findings of the visit with the appropriate grantee staff member(s). The Grantee will be given the opportunity to discuss the findings as well as any other questions and concerns with the Compliance Officer. The Compliance Officer will conduct a written exit interview in order to ensure that grantee representative is in agreement with the outcome of the visit, as well to documents any follow-up actions required by MHDC and/or grantee. The final compliance status is determined at the discretion of CI Management.

### ***Monitoring Notification***

After completing an on-site visit, MHDC staff will prepare a notification detailing the results of the review, including any minor or major findings, areas for improvement, corrective actions that need to be taken and the deadline to complete these actions.

## Compliance Violations

### ***Out of Compliance***

If the MHDC staff member finds that the grantee is out of compliance, the MHDC staff member will record that the grantee is out of compliance. Until the MHDC staff member has verified that the issue(s) has/have been resolved, funding will be suspended.

If the grantee is found out of compliance they will need to submit a Corrective Action Plan (CAP) detailing the reason(s) for out of compliance status and how the findings will be corrected. Depending on the reason(s) for out of compliance status, grantee may also be subject to a follow-up site visit conducted by MHDC staff in order to ensure that the issues have been resolved.

If the issue(s) that caused the grantee to be out of compliance are resolved after the CAP and/or follow-up site visit review, the Compliance Officer will notify the grantee that their funding is no longer suspended. If the issue(s) that caused the grantee to be out of compliance are still not resolved after the CAP and/or follow-up site visit review, the Compliance Officer will notify the grantee of their findings and funding will be suspended for all grants that the agency has been awarded through the Community Initiatives department.

### ***Consequences for Non-Compliance***

The following violations will be noted in grantee's records, and points may be assessed during future application cycles:

- Grant partially or fully recaptured (i.e., funds not fully expended by the end of the grant term)
- More than half of files reviewed at an on-site visit had missing or incomplete information
- Funds not drawn quarterly
- Grant not fully closed out by deadline

The following violations will result in grantee being out of compliance, which will require MHDC to suspend funding for all CRF grants, assess points for future applications, and in most instances, a Corrective Action Plan will be required in order to reinstate compliance:

- More than one-half of files reviewed during on-site compliance visit contained findings
- Files were unable to be reviewed during the site visit
- Files were not produced within 15 minute time frame
- Grantee will not schedule visit; after three attempts and no response from request sent within 15 days of date of request
- Grantee accommodations deemed to be unsafe or unsanitary; allegations of clients being put in danger by grantee

## Grant Close Out

Once all funds have been expended, grantee is required to close out their grant. The close out process consists of several components:

1. Cumulative report of all assistance provided during grant period (MIS System Characteristics Report).
2. All funds disbursed

All complete and final close out information needs to be submitted electronically by logging into the agency profile in MHDC's online Grant Interface on or before November 13, 2020. Any previously disbursed funds that are not backed up by the deadline will be subject to repayment.



## Appendix A – Initial Grant Documents

Before any funds can be released, all required initial grant documents must be completed and received by MHDC on or before May 6, 2020. All documents must be uploaded to the Grant Interface. Grantees with multiple CRF grants must submit required documentation for each grant (i.e., agencies cannot submit one of each required document for multiple CRF grants).

### 2020 Grant Agreement

Description:	The grant agreement is required for all grantees. The grant agreement specifically details the requirements and expectations for the administration of the grant. It is the grantee’s responsibility to know and adhere to all provisions set forth in the grant agreement.
Completion Instructions:	<p>There are three places where the Grant Agreement must be completed by grantee:</p> <ol style="list-style-type: none"> <li>1. Signature page – requires signature and notary.</li> <li>2. Workforce Eligibility Affidavit – requires signature and notary; and,</li> <li>3. Rider B – requires signature.</li> </ol> <p>All signatures must be original and by an authorized signatory as designated in the Authorized Signature Card (CI-101). The entire original signed, notarized agreement must be returned to MHDC to be considered complete. If any pages of the grant agreement are missing, the grant agreement will be considered incomplete. Failure to submit a fully complete, properly executed grant agreement before May 15, 2020 will result in recapture of the grant.</p>

### Authorized Signature Card (CI-101)

Description:	This form designates all authorized signatories for each grant. All documents that are required to be signed by grantee must be signed by authorized signatories only. If an unauthorized person signs any CRF document, the document will be rejected.
Completion Instructions:	Form must designate at least two authorized signatories. The form must have original signatures from all designated signatories (i.e., no signature stamps should be used). Please note the Authorizing Official must sign in the Authorizing Official box as well as at the bottom of the form.

### Site Contact Form (CI-102)

Description:	This form ensures that MHDC has updated information for the upcoming grant year, including staff contact information, office location(s), hours of operation, and any other relevant information. Please note that the information provided will be used to conduct scheduled and unscheduled site visits.
Completion Instructions:	Complete information pertaining to the grant indicated at top of form. If grant contact or hours of operation change, grantee is responsible for

submitting an updated Site Contact Form (CI-102) or informing Community Initiatives Coordinator via email.

### **Direct Deposit Form (CI-100) and Blank Check**

**Description:** All disbursements from MHDC to grantee will occur using an Electronic Funds Transfer (EFT). The Direct Deposit Form provides MHDC with the grantee's banking information for the electronic transfer. A blank voided check from the indicated banking institution is also required to be submitted with the Direct Deposit form. If the agency does not have access to a blank voided check a letter from the bank confirming the account and routing number will be accepted. **Please note that by default your grantee's banking information will be updated for ALL MHDC accounts. If the banking information provided is for Missouri Housing Innovation Program or one grant ONLY – it must be indicated on the Direct Deposit Form.**

**Completion Instructions:** Form must be signed with original signatures by authorized signatory.

### **E-Verify Memorandum of Understanding (MOU)**

**Description:** The E-Verify MOU is an agreement between the Department of Homeland Security (DHS) and Grantee stating that grantee agrees to participate in the Employment Eligibility Verification Program (E-Verify).

**Completion Instructions:** Grantees that were not funded in FY2019 through MHDC CI Department shall submit a copy of the full and complete MOU generated from DHS' online E-Verify system.

### **Certificate of Liability Insurance**

**Description:** The Certificate of Insurance is a one page summary of current Liability Insurance held by grantee. The insurance held by grantee may include: General Liability, Automobile Liability Umbrella Liability, Excess Liability, Worker's Compensation and Employers' Liability. The Certificate of Liability Insurance must be current. If coverage lapses during the grant year, grantee must provide MHDC with an updated Certificate.

### **United Way 2-1-1 Registration**

**Description:** United Way 2-1-1 is a phone number that individuals can call in order to receive needed resources in their area. In order to be a reliable resource for households in need, organization's need to submit updated information as changes arise.

**Completion Instructions:** Grantees are required to register/update their organization's information on the United Way's website, and print the webpage showing the organization's information is available. Additional instructions are located on the United Way's website at: <http://www.211helps.org/agency/get-listed>

## Appendix B – Client File Forms

### Consent Form (CI-108 or CI-108DV)

Applicable Grant Type(s):	Housing Assistance & Services
Description:	The Consent Form authorizes MHDC to review the household's file and also certifies safe, decent, and sanitary housing. The consent form must be completed and signed by head of household before first instance of CRF assistance. The MHDC Consent Form is the only acceptable consent form and other versions or alterations of this form will not be accepted.
Completion Instructions:	The head of household must sign the Grant Recipient's Consent to Release Information at intake. The head of the household only needs to sign the form one time during the grant year. The date of the form must be within 30 days of the first instance of assistance. The head of household must also check one of the boxes at the bottom of the consent form certifying whether or not housing is safe, decent, and sanitary. If a box is not checked then the form is not considered complete. If recipient checks the "IS NOT" box, please address agency's efforts to remedy the housing conditions in the client's file. The original signed form retained in client file.

### Income Verification Worksheet (CRF-212)

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Income eligibility must be certified at first instance of assistance with CRF. If household is receiving ongoing CRF financial assistance, income needs to be re-certified every 90 days thereafter. At each income eligibility certification, proof of income must be current within 30 days.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	This form is intended to be used to verify income eligibility as well as to summarize all assistance details for instances of assistance.
Completion Instructions:	<ol style="list-style-type: none"><li><b>1. Household Information:</b> Complete Household information for all members of the household. The "Total Number of Members in Household" will automatically calculate depending on the number of persons listed in the Household Members section. The number of members in the household is used to automatically calculate the AMI for the household size; therefore, it is very important that all members of the household are included in that section.</li><li><b>2. Gross Annual Income:</b> Once all the members of the household are listed, gross income will need to be calculated for all adult members age 18 and older. <b>A separate line should be completed for each source of income received by household member.</b> See HUD Handbook 4350.3 for complete instructions on calculating income.</li><li><b>3. Area Median Income (AMI):</b> Once the income has been calculated for all members of the household receiving income, the AMI will be calculated. The total household income is automatically calculated from the individual income calculation charts. The service provider</li></ol>

can then compare the household income to the AMI to determine if household meets income eligibility requirements.

### **Employer Verification Form (CI-112)**

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Income eligibility must be certified at first instance of assistance with CRF. If household is receiving ongoing CRF financial assistance, income needs to be re-certified every 90 days thereafter. At each income eligibility certification, proof of income must be current within 30 days.
Required:	Yes, if client is employed but cannot provide documentation of income from employment
Description:	This form is intended to be completed by the employer to verify the individual's income.
Completion Instructions:	Grantee will complete the top section of the form detailing where the form should be returned. The individual seeking assistance will sign and date the form authorizing the employer to release the individual's employment information. The employer will then complete the bottom half of the form, listing the client's employment information, as well as the employer's contact information and signature.
Submission Instructions:	Retained in client file

### **Certification of Zero Income (CI-109)**

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Completed at first instance of assistance, and re-certified every 90 days thereafter for households receiving ongoing CRF financial assistance
Required:	Yes – All members of household without income, 18 and over
Description:	A Certification of Zero Income form must be completed and signed by all recipients of the household, age 18 and over, that does not have income. The current year CI-109 form is the only acceptable form of certification of zero income and other versions or alterations of this form will not be accepted.
Completion Instructions:	All members of household without income, 18 and over must sign a Certification of Zero Income. The date of the form must be within 30 days of the instance of assistance. The original, signed form should be retained in the client file.

### **Self-Declaration of Income (CI-103)**

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Completed at first instance of assistance, and re-certified every 90 days thereafter for households receiving ongoing CRF financial assistance
Required:	Yes – All members of household who are self-employed
Description:	A Certification of Zero Income form must be completed and signed by all recipients of the household, age 18 and over, that are self-employed.
Completion Instructions:	All members of household who are self-employed, 18 and over must sign a Self-Declaration of Income. The date on the form must be within 30 days of the instance of assistance. The original, signed form should be retained in the client file.

## Self-Declaration of Housing Status (CI-105)

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Completed at first instance of assistance for households receiving ongoing CRF financial assistance
Required:	Yes – Completed by each adult in household
Description:	The Self-Declaration of Housing Status is used to determine the current housing situation of the household.
Completion Instructions:	All members of household who are 18 and over must sign a Self-Declaration of Housing Status. The date of the form must be within 30 days of the first instance of assistance. Case worker should document any attempts made to verify housing status at the bottom and sign. The original, signed form should be retained in the client file.

## COVID-19 Relief Eligibility Certification (CRF-203)

Applicable Grant Type(s):	Housing Assistance & Services
Due Date:	Completed at first instance of assistance
Required:	Yes – Completed by each adult in household
Description:	The COVID-19 Relief Eligibility Certification is used to certify that the individual lived within the state of Missouri, was impacted by the COVID-19 Pandemic, and that the income reported was accurate.
Completion Instructions:	All members of household who are 18 and over must sign a COVID-19 Relief Eligibility Certification. The date of the form must be within 30 days of the first instance of assistance.

## Area Median Income Limits (CRF-213)

Applicable Grant Type(s):	Housing Assistance & Services
Description:	The Area Median Income Limits designate the maximum income limits, by household size, allowable by CRF for the 2020 grant year. These income calculations should be referred to when determining household's income eligibility. If specific county is not listed, grantee should refer to the "Missouri – State" section at the top of the document.

## Appendix C- Non-Reimbursement Financial Process

### Hardship Request

On the 2020 COVID-19 Relief Fund Application, grantees were given the opportunity to request a hardship waiver which allowed funds to be fronted rather than reimbursed. If approved, the agency was awarded funds on a non-reimbursement basis. This ultimately means that the agency will receive an automatic disbursement of 25 percent of the total grant award amount once all required grant agreement docs are received.

MHDC will automatically disburse funds in 25 percent increments on a monthly basis once sufficient back-up covering all previously disbursed funds has been received and approved. MHDC may advance funds in increments greater than 25 percent at its discretion if sufficient back-up is provided. Please see the sample disbursement chart below.

**Disbursement and Back-Up Chart**

<b>Percent of Total Grant Award Amount Disbursed</b>	<b>25% (initial advance)</b>	<b>50%</b>	<b>75%</b>	<b>100%</b>
<b>Percent Backed Up Approved</b>	0-24%	25-49%	50-74%	75-100%

**Example:**

Grantee A is awarded \$50,000.00 therefore \$12,500.00 (25%) is advanced to Grantee A upon execution of the grant agreement. Once the grantee has expended those funds and is ready to submit back-up for the next installment of funds. Grantee A submits back-up of expenses totaling \$12,500.00 (25%), once it is approved Grantee A will automatically be advanced a second installment of \$12,500.00 (25% of the grant award amount). Grantee has now been disbursed a total of 50% of their total grant award amount.

**Submission Instructions**

To submit, funded agencies must log into their Agency Profile on MHDC’s online Grant Interface and fill out the back-up follow up for the respective submission month. All fields must be fully filled out on the online form and the following must be attached:

- Expense Detail Forms (for expenses that do not appear on MIS report e.g. salaries, essential supplies)
- MIS Report

**Incomplete/Ineligible Back-Up Submissions**

If the grantee submits back-up that is incomplete/ineligible, the program contact will be notified via email that there is feedback regarding their submission in their agency profile. Grantee will need to resolve all feedback and re-submit the back-up for a second review. No funds will be disbursed until all feedback is resolved.

**Common Reasons for Feedback on Back-Up Submissions**

- Certificate of insurance has expired
- Incorrect files uploaded
- Ineligible expenses listed
- Expenses billed outside of funding period
- Uploaded PDFs are illegible

**Funding Period**

All CRF funding provided to grantees must be used for expenses that are incurred, paid, and submitted for payment to MHDC during the Grant Funding Period as defined in the Grant Agreement. Grant must be fully backed up by September 30, 2020.

**Submission Requirements**

Funded agencies may submit back-up electronically through their agency profile at the following link: <https://www.grantinterface.com/Home/Logon?urlkey=mhdc>