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# SAFHR MORTGAGE ASSISTANCE COUNSELING DESK GUIDE

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## Application Guidance

### Overview

The purpose of the State Assistance for Housing Relief Mortgage Assistance Counseling (SAFHR - MAC) is to support programs within Missouri communities that work to prevent homeowner mortgage delinquencies, defaults, foreclosures, and displacements of homeowners experiencing financial hardship since January 21, 2020. A total amount of \$6,913,466.80 will be made available, with up to twenty-five percent of these funds available for Legal Aid agencies. These funds should be coordinated with the Missouri Housing Development Commissions' (MHDC) SAFHR for Homeowners financial assistance program to increase access to the SAFHR for Homeowners application and to provide additional housing counseling and legal services.

### Deadline

Applications for funding will be accepted on a rolling basis beginning Tuesday, September 7, 2021. The application for funding will remain available **until all funds have been awarded**, in accordance with the parameters of the Section 3206 of the American Rescue Plan Act of 2021, establishing the Homeowner Assistance Fund (HAF), and U.S. Department of the Treasury guidelines. All applications received after the application period has closed will not be considered for funding.

### Requirements

- Applicants must be a HUD certified Housing Counseling Agency or a Legal Aid Agency eligible to conduct business in Missouri, and be an entity in good standing with the state of Missouri.
- Funding will not be awarded to individuals.
- Funding will not be awarded to sub-grantees.
- Applicants will submit initial 12 month budget estimates with their online application. Approved applicants will submit subsequent yearly renewals with annual budget projections through September 30, 2025 or until all funds have been awarded.

### Eligible Activities

1. **Housing Counseling:** available for organizations that provide housing counseling for paying salaries and benefits necessary for providing services to assist in mitigating foreclosure or displacement to eligible SAFHR for Homeowners participants.
2. **Legal Services:** Up to 25% of available funds may be awarded to organizations to provide legal services regarding foreclosure prevention or displacement. Legal services may be provided directly by a legal aid applicant or indirectly via private attorneys.
3. **Administration:** available to organizations receiving awards for supporting the administration of the program.

### Evaluation of Applications

The Missouri Housing Development Commission wants to ensure that the limited pool of funding is used in the most effective way possible to help organizations provide the necessary services to eligible homeowner households in the state of Missouri. Applications may be assessed for completeness of the grant application, experience and expertise in providing programs and services which result in increased housing stability for clients, capacity to provide services, especially provision of remote support for struggling homeowner households, and other relevant factors that show how effectively the project addresses the goals of the SAFHR Mortgage Assistance Counseling program. Additionally, there are certain conditions, which may result in an application being rejected without being reviewed. These threshold requirements include, but are not limited to, missing deadlines, incomplete applications, and serious, recurrent or outstanding finding of noncompliance. Submission of an application does not guarantee an applicant will receive funds.

### Submission

Please submit all required documentation and application via MHDC's Special Project's Department online application: <https://www.mohousingresources.com/other-resources>

#### **Contact Information:**

For all questions, please contact:

#### **Amanda Eisenmann**

Housing Program Administrator

Phone: (816) 759-6698

Email: [amanda.eisenmann@mhdc.com](mailto:amanda.eisenmann@mhdc.com)

## Timeline

The following timeline lists key dates for the 2022 grant year. Grantees are responsible for knowing these dates as well as communicating them to all applicable staff.

Grant Start Date:	September 1, 2021
<b>2022 Quarter 1 (Q1)</b>	<b>January 1, 2022 – March 31, 2022</b>
Payment Request Deadlines:	Grant funds are disbursed on a monthly schedule. Payment requests received before the 1 <sup>st</sup> of the month at 5:00pm will be disbursed that month. Payment requests received after the 1 <sup>st</sup> of the month at 5:00pm will be disbursed the following month.
January Reporting Deadline:	February 4, 2022 by 5:00pm
February Reporting Deadline:	March 4, 2022 by 5:00pm
<b>2022 Quarter 2 (Q2)</b>	<b>April 1, 2022 – June 30, 2022</b>
Payment Request Deadlines:	Grant funds are disbursed on a monthly schedule. Payment requests received before the 1 <sup>st</sup> of the month at 5:00pm will be disbursed that month. Payment requests received after the 1 <sup>st</sup> of the month at 5:00pm will be disbursed the following month. Monthly
March Reporting Deadline:	April 5, 2022 by 5:00pm
April Reporting Deadline:	May 5, 2022 by 5:00pm
May Reporting Deadline:	June 3, 2022 by 5:00pm
<b>2022 Quarter 3 (Q3)</b>	<b>July 1, 2022 – September 30, 2022</b>
Payment Request Deadlines:	Grant funds are disbursed on a monthly schedule. Payment requests received before the 1 <sup>st</sup> of the month at 5:00pm will be disbursed that month. Payment requests received after the 1 <sup>st</sup> of the month at 5:00pm will be disbursed the following month.

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June Reporting Deadline:	July 5, 2022 by 5:00pm
July Reporting Deadline:	August 5, 2022 by 5:00pm
August Reporting Deadline:	September 5, 2022 by 5:00pm

### **2022 Quarter 4 (Q4)**

### **October 1, 2022 – December 31, 2022**

#### Payment Request Deadlines:

Grant funds are disbursed on a monthly schedule. Payment requests received before the 1<sup>st</sup> of the month at 5:00pm will be disbursed that month. Payment requests received after the 1<sup>st</sup> of the month at 5:00pm will be disbursed the following month.

September Reporting Deadline:	October 5, 2022 by 5:00pm
October Reporting Deadline:	November 4, 2022 by 5:00pm
November Reporting Deadline:	December 5, 2022 by 5:00pm

## Introduction

### Purpose

The State Assistance for Housing Relief (SAFHR) for Homeowners program will provide financial assistance for eligible Missouri homeowners who have been impacted by the COVID-19 pandemic. SAFHR - MAC funds should be utilized to provide housing counseling and legal services intended to keep income-qualifying Missouri homeowners financially impacted by COVID-19 housed.

### Eligibility Requirements

#### ***Income***

All SAFHR - MAC funds must be used to serve Missouri homeowners at or below 150 percent of the Area Median Income (AMI). One or more members of an applicant's household must have experienced financial hardship directly or indirectly as a result of the COVID-19 pandemic.

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

SAFHR - MAC funds must be used to assist homeowners with respect to qualified expenses related to the dwelling that is the homeowner's primary residence. Eligible households must attest that they have experienced a financial hardship, which began or extended beyond January 21, 2020, related to the COVID-19 pandemic.

### Description of Grant Activities

#### ***Housing Counseling Services***

HUD-certified Housing Counseling grantees may provide eligible individuals and households (as defined above) with housing counseling services in order to foster housing stability for their clients. This may include assisting clients with SAFHR for Homeowners financial assistance applications, connecting clients to other resources and services that may ease their financial hardship, or providing budgeting and action planning.

#### ***Legal Services***

Legal Aid grantees may provide eligible individuals and households (as defined above) with legal services in order to avoid foreclosure and preserve homeownership.

## General Information

### Contacts

Below are the MHDC SAFHR - MAC contacts for funded agencies. Please direct all questions, concerns, updates, and completed service agreement documents to the Housing Program Administrator.

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

Amanda Eisenmann  
Housing Program Administrator  
920 Main, Suite 1400  
Kansas City, MO 64105  
amanda.eisenmann@mhdc.com  
(816) 759-6698

### Website

All information and forms pertaining to the SAFHR Mortgage Assistance Counseling agencies can be found on the MHDC website at: <https://www.mohousingresources.com/other-resources>

## Financial Processes

Before any funds can be released, all required initial grant documents must be completed and received by MHDC:

1. Executed grant agreement (contract)
2. Agency site contact form
3. Authorized signature form
4. Agency W-9
5. Direct deposit form with voided check or bank letter
6. Workforce Eligibility Affidavit and E-Verify MOU
7. Public Contact Form
8. Manual Application Training Certification
9. Copy of HUD Housing Counseling agency certification.

Once all of the above criteria are met, MHDC will automatically disburse funds to the Grantee upon execution of the grant agreement. Grantee may back up disbursed funds using a back-up of expenses form.

MHDC will automatically disburse the first payment of twenty-five thousand dollars (\$25,000) once the above grant documents are received and approved. Funds will continue to be disbursed in \$25,000

increments on a monthly schedule once sufficient back-up covering all previously disbursed funds has been received and approved until the total grant award is expended. If the total grant award is less than \$25,000, MHDC will disburse one payment equaling the total grant award and the agency will submit back-up of expenses for the single disbursement until expended. Please see the disbursement and back-up examples below:

**Example 1:**

Grantee A is awarded \$100,000 and \$25,000 is automatically advanced to Grantee A upon execution of the grant agreement. Once the grantee has expended those funds, the grantee is ready to submit back-up for the next installment of funds. Grantee A submits back-up of expenses totaling \$25,000. Once it is approved, Grantee A will automatically be advanced a second installment of \$25,000. This will continue until Grantee A has expended the total award of \$100,000.

**Example 2:**

Grantee B is awarded \$100,000 and \$25,000 is automatically advanced to Grantee B upon execution of the grant agreement. Grantee B utilizes more than \$25,000 of their first grant allotment and is ready to submit back-up for the next installment of funds. Grantee B submits back-up of expenses totaling \$29,000.00. Once it is approved Grantee B will automatically be advanced a second installment of \$25,000 until Grantee B has expended the total award of \$100,000. The final payment to Grantee B will be short any allotment overages throughout the duration of the grant.

**Example 3:**

Grantee C is awarded \$20,000 therefore \$20,000 is automatically advanced to Grantee C upon execution of the grant agreement. Once the grantee has expended those funds, the grantee is ready to submit back-up. Once back-up is approved, Grantee C will have utilized all of their grant dollars and will be ready for grant close-out.

## Back-Up Process

Grantees are required to submit back-up of expenses to account for all SAFHR - MAC spending during the grant period. Back-up must be submitted after any advance of funds is made and before additional installments can be provided. MHDC requires grantees to complete the MAC Expense Detail Form (SP-109) to account for all grant eligible expenses and record client data, as determined by the US Treasury. SP-109 can be found on the MHDC website under the Community Initiatives section. Complete and accurate SP-109 forms can be submitted to [ci.accounting@mhdc.com](mailto:ci.accounting@mhdc.com) for review.

- **If Submission is Approved:** MHDC will apply back-up balance to grant and determine if agency is eligible for next disbursement of \$25,000.00. Criteria to receive additional funding can be found below:
  1. Once sufficient back-up covering all previously disbursed funds has been received, or
  2. The grant balance is at a level that risks putting the grantee into a reimbursement model

- If Submission Requires Corrections: MHDC administrator will email agency's primary grant contact and provide correction and re-submission instructions. Grantee will need to submit an updated SP-109 for review and processing. Common reasons for submission corrections include reported expenses that are paid/incurred outside of contract period, ineligible activities reported, or missing details that are necessary for the compliance process. Please note that a request for corrections should be addressed in a timely manner to prevent a delay in disbursements.

### Submission Requirements

Agencies may not submit more than one back-up form per month. Any further submissions will need to be resubmitted the following month. Additionally, agencies must submit at least one back-up per quarter. Due to the nature of the monthly submission deadlines, monthly submissions will be accepted on the first business day of the following month. Due to the nature of the monthly submission deadlines, monthly submissions will be accepted from the 2nd through the 1st of the following month. For example, a submission between April 2nd and May 1st would count as an agency's April submission and no further submissions would be allowed between those dates.

MAC Expense Detail Form (SP-109) is to be emailed to: [ci.accounting@mhdc.com](mailto:ci.accounting@mhdc.com).

### Funding Period

All SAFHR - MAC 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. If billing for salary, pay periods must also incur completely within the funding period. Grantees may request a prorated payment for payroll taxes and/or insurance, which covers any portion of the funding period, but which was paid outside of the funding period.

### Reporting Requirements

All approved applicants must collect and submit all required US Treasury reporting elements in a format and frequency determined by MHDC. Reporting elements are subject to change pending US Treasury guidance. Required program participant reporting elements include: name, city, county, gender, race, income range, and US Treasury federal priority criteria.

MHDC requires grantees to complete a MAC Monthly Reporting Form (SP-110) to record clients' demographic data. Agencies must submit one form per month by the 5<sup>th</sup> day of the month. This form will be submitted via e-mail directly to SAFHR-MAC staff monthly until a reporting portal becomes available.

Client demographic data to report for each calendar month should be for those clients that agencies began serving or served for the first time (using SAFHR-MAC funds) within that month.

MAC Monthly Reporting Form is to be e-mailed to: [amanda.eisenmann@mhdc.com](mailto:amanda.eisenmann@mhdc.com).

## Program Components and Eligible Activities

### Housing Counseling

SAFHR Mortgage Assistance Counseling funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a household that is determined to be SAFHR for Homeowners eligible (documented using SAFHR for Homeowners Eligibility Form SP-103, see Appendix B). Eligible components of these services and activities are outlined below.

#### ***Eligible Activities***

- Salaries and benefits associated with staff serving eligible SAFHR for Homeowners households in:
  - Conducting initial evaluation or intake, including verifying and documenting SAFHR for Homeowners eligibility;
  - Assisting program participants to complete and submit a SAFHR for Homeowners application. This includes providing paper applications to requesting clients, coordinating with SAFHR applicants to complete applications (including remotely), and manual entry of SAFHR assistance applications;
  - Counseling, including but not limited to:
    - Resolving/Preventing Mortgage Delinquency Workshops
    - Mortgage Delinquency and Default Resolution Counseling
    - Mobility and Relocation Counseling
    - Financial Management/Budget Counseling
    - Financial, Budgeting, and Credit Workshops
    - Loss Mitigation
    - Marketing and Outreach Initiatives
    - Reverse Mortgage Counseling
  - Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
  - Monitoring and evaluating client progress;
  - Providing information and referrals to other resources and providers;
  - Developing an individualized housing and service plan, including planning a path to permanent housing stability;
- Purchase of office supplies to be utilized for providing housing counseling services.
- Time spent making case notes that document client interactions.
- Mileage costs associated with assisting SAFHR for Homeowners eligible clients (e.g., transporting clients or travel to and from meeting with clients).

- Phone support for potential applicants referred to the agency by MHDC or outside resources. Phone support expenses may not exceed 10% of the monthly billing (up to \$1,000) of total SAFHR-MAC housing counseling salary expenses.

### ***Ineligible Activities***

- Staff time spent serving households not eligible for the SAFHR for Homeowners program
- Conference costs
- Training costs
- Food purchases
- Direct financial assistance
- Technology purchases
- Office furniture purchases
- Client incentives (i.e. gift cards, bus passes etc.)

### Legal Services Expenses

SAFHR Mortgage Assistance Counseling funds may be used to pay cost of legal advice, legal consultation and representation necessary to facilitate housing stability and mitigate foreclosure for a client that is determined as SAFHR Eligible (documented using SAFHR for Homeowners Eligibility Form SP-103). Eligible components of these services and activities are outlined below.

### ***Eligible Activities***

- Eligible costs are attorney fees for legal counsel and representation by attorneys licensed and in good standing with the Missouri Bar Association in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the client's ability to maintain homeownership. Hourly fees for legal services must not exceed a maximum cap of \$150 dollars an hour.
- Eligible subject matters include mortgage reinstatement and foreclosure mitigation.
- Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.
- Phone support for potential applicants referred to the agency by MHDC or outside resources. Phone support expenses may not exceed 10% of the monthly billing (up to \$1,000) of total SAFHR-MAC housing counseling salary expenses.
- Mileage costs for assisting SAFHR eligible clients (i.e. traveling to and from court or meetings with clients).

### ***Ineligible Activities***

- Legal services for individuals and families not eligible for the SAFHR program

- Conference costs
- Training costs
- Food purchases
- Direct financial assistance
- Technology purchases
- Office furniture purchases
- Client incentives (i.e. gift cards, bus passes etc.)

### Administration Expenses

SAFHR Mortgage Assistance Counseling funds may be used to support the reporting and administration of this grant.

#### ***Eligible Activities***

- Salaries and benefits associated with staff backing up eligible activities and their expenses.
- Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- Staff salaries, wages, and related costs of staff engaged in eligible program administration activities.
- Agencies may utilize SAFHR funds for the **rental** of hardware/software, so long as it is one hundred percent dedicated to the SAFHR program for the duration of the grant.
- Agencies may utilize SAFHR funds for the **rental** of office furniture, so long as it is one hundred percent dedicated to the SAFHR program for the duration of the grant.

#### ***Ineligible Activities***

- Administrative services for activities not related to the SAFHR program
- Conference costs
- Training costs
- Food purchases
- Mileage costs
- Technology purchases
- Office furniture purchases
- Client incentives (i.e. gift cards, bus passes etc.)

## Client Income Eligibility

All households assisted through SAFHR Mortgage Assistance Counseling are required to be at or below 100 percent of the U.S. Median Income or 150 percent of the Area Median Income (AMI), whichever is greater. SAFHR - MAC grantees should use the [Homeowner Assistance Fund Income Limits](#) to determine income eligibility. The U.S Median Income Limits and Area Median Income Limits are to be used throughout the entire grant period unless otherwise specified by MHDC. SAFHR for Homeowners 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. SAFHR-MAC grantees may also reference the [HAF Income Table 2022](#) to determine household eligibility.

The SAFHR - MAC program requires self-certification of income using SAFHR for Homeowners Eligibility form SP-103.

## Recordkeeping Requirements

Supporting documentation for expenses will be reviewed by MHDC. The charts below detail the documentation requirements for costs billed to SAFHR - MAC.

Records to Maintain - Program Participants (Additional detail provided in Appendix B: Client File Forms)

Record	Acceptable Forms of Documentation
<b>SAFHR for Homeowners Eligibility</b>	<ul style="list-style-type: none"> <li>• SAFHR for Homeowners Eligibility Form (SP-103)</li> <li>• Case notes or other documentation of services provided                             <ul style="list-style-type: none"> <li>○ Notes must be dated and detail housing goals, plans and referrals.</li> </ul> </li> </ul>
<b>Release of Information</b>	<ul style="list-style-type: none"> <li>• SAFHR Consent Form (SP-102)</li> </ul>
<b>SAFHR Paper Application</b>	<ul style="list-style-type: none"> <li>• Copy of paper application received and manually submitted by the agency with all supporting documentation provided by the household.</li> </ul>

Records to Maintain - Administration

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 SAFHR - MAC payments highlighted</li> <li>• Invoice/Receipt</li> </ul>
<ul style="list-style-type: none"> <li>• Employee Compensation</li> </ul>	<ul style="list-style-type: none"> <li>• Timesheets from working with eligible clients</li> </ul>	<ul style="list-style-type: none"> <li>• Paystub listing the pay period, employee name and last four digits of employees’ SSN</li> <li>• Timesheets signed by supervisor and employee detailing eligible SAFHR – MAC activities</li> </ul>

		<ul style="list-style-type: none"> <li>• Bank statement with SAFHR - MAC payments highlighted</li> <li>• Hourly rate for legal services cannot exceed a maximum cap of \$150 an hour.</li> </ul>
<ul style="list-style-type: none"> <li>• Mileage costs</li> </ul>	<ul style="list-style-type: none"> <li>• Travel request or mileage expense report which includes date(s) of travel, from/to, purpose of travel (eligible client), number of miles, and total mileage costs</li> </ul>	<ul style="list-style-type: none"> <li>• Check register or credit card statement with payments made by SAFHR-MAC highlighted and/or returned checks log</li> </ul>
<ul style="list-style-type: none"> <li>• Phone Support costs</li> </ul>		<ul style="list-style-type: none"> <li>• Time sheets signed by supervisor and employee, listing Phone Support as a single line item. Time billed cannot exceed 10% (up to \$1,000) of employee’s total SAFHR-MAC activities.</li> </ul>

## Termination and Grievance Procedures

All SAFHR - MAC 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 SAFHR - MAC. 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

SAFHR Mortgage Assistance Counseling grantees should develop or update current written prioritization standards in relation to administration of its MAC grant. Program Guidelines should clearly detail alignment with U.S. Department of Treasury guidance for prioritization based on income status (households with incomes less than 100% AMI or 100% of the US Median income, whichever is greater) and prioritization based on a client defined as a “Socially Disadvantaged Individual.” These policies and procedures for assessing eligibility for assistance and determining and prioritizing which eligible households will receive assistance should also include prioritization of households currently facing foreclosure. Procedures should be retained by grantee and made available upon request by MHDC.

## Monitoring

In order to track a grantee’s program compliance with MHDC regulations, ensure accurate spending of SAFHR - MAC funds, prevent fraud and abuse, and identify technical assistance needs, MHDC staff will

monitor grantees' by conducting on-site or desk audit compliance reviews as well as through review of all financial documentation submitted to MHDC.

## On-Site Compliance Visits

On-site compliance visits will be conducted at the location designated by the grantee on the Site Contact form. The MHDC Compliance Officer will review expenses billed to SAFHR-MAC. The information reviewed is gathered from the SP-109 back-up forms. Agency processes, procedures, and programmatic data may also be requested for review. The Compliance Officer will not provide the grantee the names of the files to be checked prior to the visit; this is to ensure that all files will be reviewed in the state in which they are normally kept.

The requested files are expected to be produced within fifteen (15) minutes of the Compliance Officer's arrival. 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 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. 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 Community Programs grants, outcome of announced visit, and fulfilling grant requirements such as timely and accurate submission of back-up. 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 for compliance visits. As with all files, the time limit to produce these files is fifteen (15) minutes during a site visit.

## Desk Audit Compliance

MHDC staff may conduct a remote desk audit in lieu of or in addition to an on-site visit. The MHDC Compliance Officer will review electronically submitted expenses billed to SAFHR-MAC and any other programmatic documentation. The financial information reviewed is gathered from the SP-109 back-up reports. Specific files for review will be requested on a previously agreed-upon date. The grantee will have 24 hours to upload the requested documentation per MHDC's instructions.

## Audit Follow-Up

### *Exit Interview*

At the conclusion of the site visit or desk audit, the Compliance Officer will conduct an exit interview. In the case of an on-site visit, 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 understands the outcome of the visit, and to document any follow-up actions required by MHDC and/or grantee. In the case of a Desk Audit, the exit interview will be sent via email. The grantee will be given a timeframe to address any questions and/or concerns and to provide any missing documentation outlined in the email. The final compliance status is determined at the discretion of MHDC.

### *Monitoring Notification*

After completing an on-site or desk audit, 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

If the MHDC staff member finds the grantee to be out of compliance, the MHDC staff member will record the grantees' out of compliance status. Until it has been verified that the issue(s) has/have been resolved, funding will be suspended. If the grantee is found out of compliance they will be required to submit a Corrective Action Plan (CAP) detailing the reason(s) for out of compliance status and how the findings will be corrected. 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 an agency is found to be out of compliance, funding will be suspended. Once the grantee is placed back into compliance with the SAFHR-MAC grant in which they were found to be out of compliance, funding will be reinstated. 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 Programs department.

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 Programs 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 the SAFHR-MAC grant, assess point reductions 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 or financial documentation reviewed during on-site compliance visit or desk audit 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

The SAFHR - MAC program and grant period will continue through September 30, 2025 or when all funds have been expended.

More guidance coming soon.

## Appendix A – Initial Grant Documents

Before any funds can be released, all required initial grant documents must be completed and received by MHDC. All documents must be submitted electronically.

### Site Contact Form (SP-100)

**Description:** This ensures that MHDC has updated information for the upcoming grant period, including staff contact information, office location(s), hours of operation, and any other relevant information. Please note that the information provided may be used to conduct scheduled and unscheduled site visits.

### Public Contact Form (MHDC-115)

**Description:** This form ensures that MHDC has updated agency information for the upcoming grant period, including primary address and phone number, counties served, satellite locations, office closings, and services provided.

### Authorized Signature Card (MHDC-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 SAFHR-MAC document, the document will be rejected.

### 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.

### Direct Deposit Form (MHDC-100) and Blank Check/Bank Letter

**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 SAFHR MAC or one grant ONLY – it must be indicated on the Direct Deposit Form.**

### Workforce Eligibility Affidavit

**Description:** This document is required for all grantees. This form certifies that the grantee does not employ any person who is an unauthorized alien in

conjunction with the contracted services, and that the Respondent is enrolled and participates, or who will enroll and participate, in a federal work authorization program with respect to the employees working in connection with the contracted services.

### **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).

### **Form W-9**

Description: Form W-9 is used to verify the grantee's Tax Identification Number (TIN).

### **Manual Application Training Certification (SP-113)**

Description: This form is to be completed by the agency, and signed by staff members who are requesting login credentials to the manual application portal.

### **HUD Counseling Certification**

Description: SAFHR-MAC recipients must provide verification that they are a HUD Certified Housing Counseling Agency or a Legal Aid Agency eligible to conduct business in Missouri.

## Appendix B – Agency Forms

### **SAFHR – MAC Expense Detail Form (SP-109)**

Due Date:	At minimum, the expense detail form is to be submitted quarterly.
Required:	Yes
Submission:	Submitted via email to <a href="mailto:ci.accounting@mhdc.com">ci.accounting@mhdc.com</a> .
Description:	The Expense Detail Form is used to submit a record of all grant eligible expenses as back-up against the agency distribution.

### **SAFHR – MAC Monthly Reporting Form (SP-110)**

Due Date:	By or on the 5 <sup>th</sup> day of every month.
Required:	Yes
Submission:	Submitted via <a href="#">e-mail</a> to <a href="mailto:amanda-eisenmann@mhdc.com">amanda-eisenmann@mhdc.com</a> .
Description:	This Monthly Reporting Form provides client level demographic data that MHDC is periodically required to provide to Treasury.

## Appendix C – Client File Forms

### **SAFHR for Homeowners Eligibility Form (SP-103)**

Due Date:	Completed at first instance of assistance with MAC agency.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	This form is intended to be used to verify SAFHR for Homeowners eligibility according to Treasury guidelines, certifying both income and household hardship. This form is also available in Spanish at <a href="http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm">http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm</a>

### **Borrower-Agency Authorization**

Due Date:	Completed at first instance of assistance with MAC agency.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	This form is intended to be used to verify the applicant’s consent to include an agency representative in the electronic application process. This form can be found at <a href="http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm">http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm</a>

### **Consent Form (SP-102)**

Due Date:	Completed at first instance of assistance with MAC agency.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	The Consent Form authorizes MHDC to review the household’s file. The consent form must be completed and signed by head of household before first instance of MAC assistance. The MHDC Consent Form is the only acceptable consent form and other versions or alterations of this form will not be accepted. This form is also available in Spanish at <a href="http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm">http://mhdc.com/COVID%20Assistance/SAFHR-MAC/index.htm</a>

### **SAFHR for Homeowners Paper Application**

Due Date:	Upon client submission
Required:	When applicable
Submission/Retention:	Retained in client file
Description:	Any paper application received and submitted on behalf of a household must be kept on file by the grantee along with any supporting documentation provided (ID, income statements, property verification, hardship attestation, homeowner-agency authorization, consent forms, release of information, SAFHR for Homeowners Eligibility form etc.)

### **HAF Income Table 2022**

Due Date:	N/A
Required:	No
Submission / Retention:	For Agency use
Description:	The HAF Income Table 2022 is a tool that can be utilized to determine household income eligibility per UMI / AMI guidelines by county.