
MISSOURI HOUSING
DEVELOPMENT COMMISSION

Housing Stability &
Eviction Diversion
FY2024

DESK GUIDE



Table of Contents

Introduction	3
General Information	4
Timeline-FY2024	5
Financial Processes	7
Reporting Requirements	10
Program Components and Eligible Activities	11
Client Income Eligibility	17
Client Housing Status Eligibility	17
Recordkeeping Requirements	17
Termination and Grievance Procedures	21
Prioritizing Assistance	21
Monitoring	21
Grant Close Out	24
Appendix A – Initial Grant Documents	25
Appendix B – Agency Forms/Data Submissions	28
Appendix C – Client File Forms	29

Introduction

Purpose

The Missouri Housing Development Commission (MHDC) has allocated grant funding to support programs within Missouri communities that work to prevent evictions and help ensure long-term housing stability for eligible Missouri renters. Housing Stability and Eviction Diversion (HSED) funds should be utilized to provide assistance related to eviction relief, case management and legal services intended to keep low to moderate-income Missouri tenants financially impacted by COVID-19 housed. Priority will be given to organizations who propose to offer both Eviction Relief and Housing Stability services.

Eligibility Requirements

Income

All HSED funds must be used to serve Missouri renter households at or below 80 percent of the Area Median Income (AMI). Assistance should be prioritized for households below 50 percent of the AMI for the geographic area adjusted for family size. The AMI for each county in Missouri is defined by the Department of Housing and Urban Development (HUD). The HSED AMI limits are adjusted for household size and can be obtained using the Department of Housing and Urban Development (HUD) 2024 Income Limits data set at https://www.huduser.gov/portal/datasets/il/il2024/select_Geography.odn.

Additionally, one or more individuals within a household must have qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due, directly or indirectly, to the coronavirus pandemic.

Housing Status

All recipients of HSED assistance must be currently renting or seeking to rent a residential property in the state of Missouri. Additionally, one or more individuals within a household must have experienced/are experiencing homelessness or housing instability during or due, directly or indirectly, to the coronavirus pandemic.

Qualifying recipients of Eviction Relief (direct assistance) must be able to provide court documentation of an active or prior eviction occurring after March 13, 2020.

Eligible Program Components

Eviction Relief

Grantees may provide direct assistance to eligible individuals and households to support eviction relief. Qualifying direct assistance includes rental judgements, security deposits, 3-6 months of forward rent, and up to 6 months of utility arrears if the arrearages are preventing future housing. **Recipients are only eligible for this assistance if they are in active eviction proceedings or experienced an eviction after March 13, 2020, and meet all other qualifying criteria as outlined above.** Additionally, qualifying

recipients must provide court documentation of an active or prior eviction occurring after March 13, 2020.

Housing Stability and Eviction Diversion Services

Grantees may provide eligible individuals and households with case management and/or legal services in order to foster housing stability for their clients. This may include connecting clients to other resources and services that may ease their financial hardship, providing outreach services, and/or providing legal aid to tenants facing eviction.

Administration

Grantees may use HSED funds to support the administration of the program. *Administration expenses may not exceed 10% of the total grant award/expenditure.*

General Information

Contacts

Below is the MHDC – HSED contact for funded agencies. Please direct all questions, concerns, updates, and completed service agreement documents to the Housing Program Administrator.

Please direct HSED 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 Housing Stability and Eviction Diversion agencies can be found on the MHDC website at: <https://mhdc.com/programs/community-programs/covid-relief/>

Timeline-FY2024

The following timeline lists key dates for the FY2024 grant year ending December 31, 2024. Grantees are responsible for knowing these dates as well as communicating them to all applicable staff.

Grant Start Date:

January 1, 2024

2024 Quarter 1 (Q1)

January 1, 2024 – March 31, 2024

Payment Request Deadlines:

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

January Reporting Deadline:

February 5, 2024, by 5:00pm

February Reporting Deadline:

March 5, 2024, by 5:00pm

2024 Quarter 2 (Q2)

April 1, 2024 – June 30, 2024

Payment Request Deadlines:

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

25% Spending Deadline

May 1, 2024, by 5:00pm

March Reporting Deadline:

April 5, 2024, by 5:00pm

April Reporting Deadline:

May 6, 2024, by 5:00pm

May Reporting Deadline:

June 5, 2024, by 5:00pm

2024 Quarter 3 (Q3)

July 1, 2024 – September 30, 2024

Payment Request Deadlines:

Grant funds are disbursed on a monthly schedule. Payment requests received and approved before the 1st of the month at 5:00pm will be disbursed within that month. Payment requests received and approved after

the 1st of the month at 5:00pm will be disbursed the following month.

June Reporting Deadline: July 5, 2024, by 5:00pm
July Reporting Deadline: August 5, 2024, by 5:00pm
August Reporting Deadline: September 5, 2024, by 5:00pm

2024 Quarter 4 (Q4)

October 1, 2024 – December 31, 2024

Payment Request Deadlines: Grant funds are disbursed on a monthly schedule. Payment requests received and approved before the 1st of the month at 5:00pm will be disbursed within that month. Payment requests received and approved after the 1st of the month at 5:00pm will be disbursed the following month.

75% Spending Deadline

October 1, 2024

September Reporting Deadline: October 7, 2024
October Reporting Deadline: November 5, 2024
November Reporting Deadline: December 5, 2024
December Reporting Deadline: January 6, 2025
Final Spending Deadline: December 31, 2024

Grant Close Out:

January 31, 2025

Financial Processes

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

At Time of Application:

1. Board of Directors
2. Certificate of Good Standing
3. 501(c)(3) Verification
4. Sources and Uses
5. Audit/Financials

At Time of Approval (if granted):

1. Executed Grant Agreement including all Riders (contract)
2. Agency Site Contact form
3. Public Contact form
4. Certificate of Liability Insurance
5. Authorized Signature form
6. Agency W-9
7. Direct Deposit form with voided check or bank letter
8. Workforce Eligibility Affidavit and E-Verify MOU
9. United Way 211 Registration
10. Eviction Relief Certification
11. Personnel Agreement to Comply with HSED Information Security Standards

Disbursement Procedure and Timeline

MHDC will automatically disburse 25 percent of the total grant award amount upon execution of the grant agreement, and once the above grant documents are received and approved. Grantee may back-up disbursed funds by submitting the HSED Expense Detail Form (CP-106) to Grant Interface.

MHDC will automatically disburse funds in 25 percent increments no more than once per month and no less than once per quarter, once sufficient back-up submission 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. Additional disbursements (upon approval) will be made in 25 percent increments upon full funding expenditure, at the sole discretion of MHDC.

Please see the sample disbursement chart and back-up examples below:

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

Example 1:

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 the grantee 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.

Example 2:

Grantee B is awarded \$50,000.00 therefore \$12,500.00 (25%) is advanced to Grantee B 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 B submits back-up of expenses totaling \$25,000.00 (50% of the grant award amount), once it is approved Grantee B will automatically be advanced a second installment of \$25,000.00 (50% of the grant award amount). Grantee has now been disbursed a total of 75% of their total grant award amount.

Example 3:

Grantee C is awarded \$50,000 therefore \$12,500 (25%) is 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 for the next installment of funds. Grantee C submits back-up of expenses totaling \$41,000.00 (82% of the grant award amount), once it is approved Grantee C will automatically be advanced a second installment of \$37,500 (75% of the grant award amount). Grantee has now been disbursed a total of 100% of their total grant award amount.

Submission Requirements

Grantees are required to submit back-up of expenses to account for all HSED 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 HSED Expense Detail Form (CP-106) to account for all grant eligible expenses and record client data, as determined by the US Treasury. CP-106 can be found on the MHDC website under the Community Programs section.

Complete and accurate CP-106 forms can be submitted via Grant Interface:
<https://www.grantinterface.com/Home/Logon?urlkey=mhdc>

- **If Submission is Approved:** MHDC will apply back-up balance to grant and determine if agency is eligible for next disbursement of 25 percent. Criteria to receive additional funding can be found below:
 1. Once sufficient back-up covering all previously disbursed funds has been received, or
- **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 CP-106 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.

Quarterly Submissions

Grantees must have a minimum of one Back-Up submission per quarter. Back-Up submissions that result in discard and/or are not greater than zero dollars do not fulfill the quarterly submission requirement. HSED quarters and submission deadlines are detailed above under "Timeline." In the event the quarterly submission deadline falls on a weekend or state/federal holiday, the deadline will default to the next business day.

Grantees may not submit more than one back-up form per month. Any further submissions will need to be resubmitted the following month. Additionally, Grantees must submit at least one back-up submission per quarter. Due to the nature of the monthly submission deadlines, monthly submissions will be accepted from the 2nd through the 1st of the following month.

Additionally, submissions must be approved by the 1st of the month to initiate the next disbursement. Back-Ups that are not approved by the 1st will be included in the following month's payment cycle. MHDC recommends submitting prior to the 1st to ensure there is enough time for corrections before the submission deadline.

Spending Deadlines

Grantees must provide Back-Up of 25 percent of their overall grant award amount by May 1, 2024 and provide Back-Up of 75 percent of their overall grant award by October 1, 2024. Additionally, HSED 2024 funding must be 100 percent expended by December 31st, 2024. Failure to meet the spending deadlines may result in a reduction of points on future applications, and/or a repayment of funds to MHDC. Back-Up submissions that result in discard do not fulfill the spending deadlines.

If spending deadlines are not met by the dates specified above, MHDC may, in its sole and absolute discretion, place agencies into a reimbursement model for the duration of the HSED 2024 grant, or until said deadlines are met. A reimbursement model requires grantees to perform eligible spending first, and then seek grant fund reimbursement for eligible documented expenses.

Supporting Documentation

Along with the back-up form, HSED grantees are also required to maintain supporting documentation for financial assistance on-site. Grantees are not required to submit supporting documentation with their quarterly expenses, but it must be readily available on-site for review by MHDC's Compliance Officer. More information regarding supporting documentation can be found under Recordkeeping Requirements on pgs. 15-18 of the HSED Desk Guide.

Funding Period

All HSED 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. Billing for salary, pay periods, and eviction relief 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

Demographic Reporting

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 monthly reporting regarding client demographic data (at entry to the HSED program) using form CP-107. **Client demographic data for each calendar month should be for those clients that agencies began serving or served for the first time (using HSED funds) within that month.**

Grantees must submit all client data for the month by the 5th day of the following month by sending CP-107 to cp.submissions@mhdc.com.

MHDC Clearinghouse

The MHDC Clearinghouse is a web-based database created and maintained by MHDC to fulfill the requirements of the United States Treasury in the distribution of Emergency Rental Assistance (ERA) funding.

Grantees who administer Eviction Relief assistance are required to be trained and certified in the Clearinghouse database. It is the responsibility of the grantee to ensure all appropriate staff members have completed the MHDC Clearinghouse training and are well versed in federal requirements regarding these funds.

Grantees are also responsible for adapting internal policies and procedures to ensure that the data entered into the Clearinghouse is consistent with expenses reported on the CP-106 submission. Recurrent data quality errors may result in non-compliance with the HSED program.

Program Components and Eligible Activities

Eviction Relief

Housing Stability and Eviction Diversion funds may be used to provide direct assistance to eligible individuals and households to support eviction relief. **Recipients are only eligible for Eviction Relief if they are in active eviction proceedings or experienced an eviction after March 13, 2020, and meet all other qualifying criteria as outlined in the eligibility requirements.** Furthermore, **direct assistance dollars cannot be paid directly to the tenant under any circumstances.** Grantees are expected to apply reasonable fraud-prevention procedures and to investigate and address potential instances of fraud or the misuse of direct assistance funds that they become aware of.

Eligibility for Eviction Relief must be documented on HSED Eligibility Form CP-101 and Eviction Relief Eligibility Form CP-112. All Eviction Relief recipient files must also include a completed copy of CP-116 Clearing House Verification Tool. Eligible components of these services and activities are outlined below.

Eligible Activities

- **Rental Judgements:** Grantees may provide payment to the court and/or its appropriate parties in order to satisfy eviction judgements and/or eviction filings on behalf of eligible households. The purpose of these funds is to reduce barriers to stable housing for tenants that are experiencing/have experienced an eviction as a result of the COVID-19 Pandemic. Eligible Rental Judgement expenses include:
 - Up to \$15,000 per household for those whose hardship occurred after March 13, 2020. Rental judgement payments cannot be made to collection agencies.
 - Late fees and legal fees may be considered as part of Rental Judgement assistance if they are included in the rental ledger. Late fees should only be considered if they are consistent with what was agreed upon in the original Lease Agreement.
 - Partial payments can only be considered if the remaining balance is satisfied via another funding source at the time of HSED assistance.
 - Rental judgement payments must be paid towards arrears that are included in a past or current eviction.
- **Forward Rent:** Grantees may provide 3-6 months of forward rent payments to the property owner on behalf of eligible households **who are receiving direct HSED assistance via Rental Judgements and/or a Security Deposit.** The purpose of these funds is to ensure ongoing

housing stability after an eviction filing or judgement has been released. The following criteria must be met to provide forward rent payments:

- Forward rent payments can only be remitted in increments of 3 months, with a CP-101 HSED Eligibility form completed no longer than 90 days before the date of payment. Forward rent payments cannot exceed 6 months per household.
 - Agencies may provide a second instance of 3 months forward rent if:
 - The client re-attests to ongoing hardship via a new CP-101 HSED Eligibility form.
 - The grantee re-certifies the client's Eviction Relief eligibility via a new CP-112/116.
 - Clients are not eligible for forward rent if they have exceeded/will exceed their 18-month maximum benefit, verified using CP-112/116.
 - Lease Agreement must be in effect for the months of assistance provided. Forward rent payments provided for months outside of the lease duration are not eligible under HSED 2024.
 - Forward rent payments must be made directly to the property owner/property management company and cannot under any circumstances be made directly to the client.
- **Security Deposit:** Grantees may provide a security deposit to the property owner on behalf of eligible households **who are receiving direct HSED assistance via rental judgements and/or have experienced an eviction after March 13, 2020**. The purpose of these funds is to secure stable housing for qualifying tenants that are experiencing/have experienced an eviction as a result of the COVID-19 pandemic. Eligible security deposit expenses include:
 - Funds may be used to pay for a security deposit that is **less than or equal to one months' rent**. The security deposit must secure a lease with a duration of at least 6 months.
 - **Utility Arrears:** Grantees may provide direct payment to utility companies in order to satisfy utility arrears on behalf of eligible households **who are receiving direct HSED assistance via Rental Judgements and/or a Security Deposit**. The purpose of these funds is to reduce barriers to stable housing for tenants that may have acquired utility arrears as a result of the COVID-19 Pandemic. Eligible Utility Arrears expenses include:
 - Up to six (6) months of utility arrears **if the arrearages are preventing future housing** and occurred after March 13, 2020.
 - Qualifying utilities include:
 - Up to a combined 6 months of gas, electric, water, sewage/wastewater, and trash, if the arrearages are preventing future housing for qualifying recipients of HSED direct assistance.

- Partial payments can only be considered if the remaining balance is satisfied via another funding source at the time of HSED assistance.

Ineligible Activities

- Eviction Relief (rental judgement, security deposit, utility assistance) for individuals and families not eligible for the HSED program;
- Eviction relief for judgements in excess of \$15,000;
- Eviction relief for judgements occurring on or before March 13, 2020;
- Eviction relief for tenants who have already received their maximum ERA benefit of 18 months of utility/rental assistance;
- Eviction relief for tenants who have already received ERA benefits for overlapping months;
- Eviction relief for tenants who's eviction has not been filed with the courts;
- Eviction Relief payments made to ineligible parties (i.e., client, collection agencies);
- Eviction Relief assistance that does not fully satisfy the outstanding balance;
- Rental Judgement payments for arrears that are not included in an eviction (past or present);
- Damage fees;
- Late fees that are not consistent with the original Lease Agreement;
- Forward rent for months outside of the Lease Agreement;
- Forward rent payments exceeding 6 months;
- Forward rent for clients who are not receiving Rental Judgement or Security Deposit assistance;
- Security deposits that are greater than one months' rent;
- Security deposits for leases that have less than a 6 month duration;
- Security deposits for rent-to-own agreements where the renter:
 - i. is a signor or co-signor to the mortgage on the property
 - ii. holds the deed or title to the property
 - iii. has exercised their option to purchase the property.
- Rental Insurance;
- Utility Assistance exceeding 6 months of arrears;
- Utility Assistance for arrearages that are not preventing future housing;
- Utility Assistance that does not fully satisfy the outstanding balance;
- Forward utilities;
- Forward rent;
- Client incentives (i.e., gift cards, bus passes, etc.);
- Direct financial assistance outside of the parameters outlined in Eviction Relief, Security Deposit and Utility Assistance.

Housing Stability and Eviction Diversion funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized case management and legal services to facilitate housing stability for a client that is determined to be HSED eligible (documented using HSED Eligibility Form CP-101). Eligible components of these services and activities are outlined below.

Case Management Services

Housing Stability and Eviction Diversion funds may be used to pay cost of case management and the delivery of case management services to facilitate housing stability for a client that is determined as HSED eligible (documented using HSED Eligibility Form CP-101). Eligible components of these services and activities are outlined below:

Eligible Activities

- Salaries and benefits associated with staff serving eligible HSED clients in:
 - Conducting initial evaluation or intake, including verifying and documenting HSED eligibility;
 - Counseling;
 - Developing, securing, and coordinating services and obtaining federal, state, and local benefits;
 - Monitoring and evaluating client progress;
 - Providing information and referrals to other providers;
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability;
 - Providing remote and/or outreach services to eligible HSED clients.
- Time spent making case notes that document client interactions.
- Mileage costs associated with assisting HSED eligible clients (i.e., transporting clients or travel to and from meeting with clients, outreach). *Mileage costs may not exceed the state of Missouri's standard mileage rate of \$0.655/mile.*
- Eligible benefits and taxes include;
 - Employer paid benefits (i.e., healthcare, dental, life insurance, etc.);
 - Employer paid taxes (unemployment, social security, Medicare, etc.);
 - Employee paid federal and state tax withholdings are eligible if a grantee reports the employee's net salary on their CP-106 submission

Ineligible Activities

- Case Management services for individuals and families not eligible for the HSED program
- Conference costs
- Training costs
- Food purchases

- Direct financial assistance (other than HSED Eviction Relief)
- Technology purchases/rentals
- Office furniture purchases/rentals
- Employee paid tax withholdings (when gross salary is reported)
- Client incentives (i.e., gift cards, bus passes, etc.)

Legal Services

Housing Stability and Eviction Diversion funds may be used to pay cost of legal advice and representation in the delivery of legal services to facilitate housing stability for a client that is determined as HSED eligible (documented using HSED Eligibility Form CP-101). Eligible components of these services and activities are outlined below.

Eligible Activities

- Eligible costs are the hourly fees for legal advice 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 obtain and retain housing. Hourly fees for legal services must not exceed a maximum cap of \$150 dollars an hour.
- Eligible costs may also include mediation between the client and the owner or person(s) with whom the client is living, provided that the mediation is necessary to prevent the client from losing permanent housing in which the client currently resides.
- Eligible subject matters are limited to evictions.
- Component services or activities may include client intake, preparation of cases for trial, preparation/disbursement of Eviction Relief, provision of legal advice, representation at hearings, and counseling.
- Mileage costs for assisting HSED eligible clients (i.e., traveling to and from court or meetings with clients). *Mileage costs may not exceed the state of Missouri's standard mileage rate of \$0.655/mile.*
- Eligible benefits and taxes include;
 - Employer paid benefits (i.e., healthcare, dental, life insurance, etc.);
 - Employer paid taxes (unemployment, social security, Medicare, etc.);
 - Employee paid federal and state tax withholdings are eligible if a grantee reports the employee's net salary on their CP-106 submission

Ineligible Activities

- Legal services for individuals and families not eligible for the HSED program
- Legal services for matters not regarding evictions
- Conference costs
- Training costs

- Food purchases
- Direct financial assistance (other than HSED Eviction Relief)
- Technology purchases/rentals
- Office furniture purchases/rentals
- Employee paid tax withholdings (when gross salary is reported)
- Client incentives (i.e., gift cards, bus passes, etc.)

Administration

Housing Stability and Eviction Diversion funds may be used to support the reporting and administration of this grant. Eligible components of these services and activities are outlined below:

Administration expenses cannot exceed 10% of the total grant award/expenditure.

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, 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.
- Eligible benefits and taxes include;
 - Employer paid benefits (i.e., healthcare, dental, life insurance, etc.);
 - Employer paid taxes (unemployment, social security, Medicare, etc.);
 - Employee paid federal and state tax withholdings are eligible if a grantee reports the employee's net salary on their CP-106 submission

Ineligible Activities

- Administrative services for activities not related to the HSED program
- Conference costs
- Training costs
- Food purchases
- Mileage costs
- Technology purchases/rentals
- Office furniture purchases/rentals
- Employee paid tax withholdings (when gross salary is reported)
- Client incentives (i.e., gift cards, bus passes, etc.)

Client Income Eligibility

All households assisted through the HSED program are required to be at or below 80 percent of the Area Median Income (AMI) and/or be verified as a low-income family in connection with another local, state or federal government assistance program (verified by CP-101 HSED Eligibility Form). HSED grantees should use the 2024 Department of Housing and Urban Development (HUD) Median Income data set at: https://www.huduser.gov/portal/datasets/il/il2024/select_Geography.odn.

The Area Median Income Limits are to be used throughout the entire grant period unless otherwise specified by MHDC. MHDC 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.

Additionally, one or more individuals within a household must have qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due, directly or indirectly, to the coronavirus pandemic.

Client Housing Status Eligibility

All recipients of HSED assistance must be currently renting or seeking to rent a residential property in the state of Missouri. One or more individuals within a household must have experienced/are experiencing homelessness or housing instability during or due, directly or indirectly, to the coronavirus pandemic (verified using CP-101 HSED Eligibility Form).

Additionally, qualifying recipients of Eviction Relief (direct assistance) **must be able to provide court documentation of an active or prior eviction after March 13, 2020.**

HSED grantees must verify eligibility via court documentation and other criteria to determine direct assistance eligibility. Please see Recordkeeping Requirements for more guidance.

Recordkeeping Requirements

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

NOTE: “Proof of Cleared Payment” must be provided using the documentation outlined in Section A-6 below. Payments made via payment applications (i.e., PayPal, Venmo, CashApp etc.) will not be considered as Proof of Cleared Payment.

***All documentation must be kept on-site and/or in client files for MHDC compliance purposes.*

A. Records to Maintain - Program Participants Receiving Eviction Relief

Record	Acceptable Forms of Documentation
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<p>1. HSED Eligibility</p>	<ul style="list-style-type: none"> • HSED Eligibility Form (CP-101) signed by the Head of Household. • Eviction Relief Eligibility Form (CP-112) signed by Head of Household and agency representative. • Completed Clearing House Verification Tool (CP-116)
<p>2. Release of Information</p>	<ul style="list-style-type: none"> • HSED Consent Form (CP-102) signed by the Head of Household.
<p>3. Head of Household Identification</p>	<ul style="list-style-type: none"> • Government Issued ID for the Head of Household. If Government Issued ID is not available, detailed notes of the staff member’s attempt to obtain this requirement must be detailed in the client’s case notes.
<p>4. Rental Judgements</p>	<ul style="list-style-type: none"> • If client is in active eviction; copy of eviction filings from the corresponding court (dated after March 13, 2020) and; • Copy of ledger from landlord/property manager that includes: <ul style="list-style-type: none"> ○ Months of assistance included in the judgement and total balance due ○ Landlord/Property Manager name ○ Client’s name and address where assistance is being requested • If client had a prior eviction judgement; copy of judgement from the corresponding court (dated after March 13, 2020). <ul style="list-style-type: none"> ○ Copy of ledger from landlord/property manager showing the months of assistance included in the judgement and total balance due and; • Proof of cleared payment (see Section A-6)
<p>5. Forward Rent</p>	<ul style="list-style-type: none"> • HSED Eligibility Form (CP-101) that is no more than 90 days old. • Eviction Relief Eligibility (CP-112). If second instance of forward rent is provided, agency must complete a new CP-112. • Clearing House Verification Tool (CP-116). If a second instance of forward rent is provided, agency must complete a new CP-116. • Landlord/owner W9 • Proof of ownership of landlord/property manager <ul style="list-style-type: none"> ○ Copy of mortgage bill, homeowner’s insurance policy, or property tax statement. • Proof of cleared payment to landlord (see Section A-6) • Proof of prior eviction (see Section A-3) • Fully executed Lease Agreement that includes; <ul style="list-style-type: none"> ○ Landlord’s name, address and phone number ○ Address of rental property where assistance is being received ○ Amount of monthly rent and security deposit ○ Rent due date and grace period (if any) ○ Term of lease (forward rent must fall within lease term) ○ Landlord and client signature

<p>6. Security Deposit</p>	<ul style="list-style-type: none"> • Landlord/owner W9 • Proof of ownership of landlord/property manager <ul style="list-style-type: none"> ○ Copy of mortgage bill, homeowner’s insurance policy, or property tax statement. • Proof of cleared payment to landlord (see Section A-6) • Proof of prior eviction (see Section A-3) • Fully executed Lease Agreement that includes; <ul style="list-style-type: none"> ○ Landlord’s name, address and phone number ○ Address of rental property where assistance is being received ○ Amount of monthly rent and security deposit ○ Rent due date and grace period (if any) ○ Term of lease (must be at least 6 months) ○ Landlord and client signature
<p>7. Utility Arrears</p>	<ul style="list-style-type: none"> • Copy of utility bill(s) including: <ul style="list-style-type: none"> ○ Client name and subject property address ○ Billing date ○ Billing/payment history to ensure months of assistance ○ Total delinquent amount • Proof of cleared payment (see Section A-6) • Proof of eviction (see Section A-3)
<p>8. Proof of Cleared Payment</p>	<ul style="list-style-type: none"> • Copy of satisfied judgement from the corresponding court; and <ul style="list-style-type: none"> ○ Copy of cleared check; or ○ Copy of check and; Bank statement highlighting the cleared payment. <p><i>*If a copy of the satisfied judgement cannot be obtained, please leave detailed case notes outlining the attempt(s) to obtain it.</i></p>
<p>9. Service Engagement Records</p>	<ul style="list-style-type: none"> • Case notes or other documentation of services provided • Notes must be dated and detail housing goals, direct assistance provided, housing plans and referrals.

B. Records to Maintain - Program Participants Receiving Case Management

Record	Acceptable Forms of Documentation
<p>1. HSED Eligibility</p>	<ul style="list-style-type: none"> • HSED Eligibility Form (CP-101)
<p>2. Release of Information</p>	<ul style="list-style-type: none"> • HSED Consent Form (CP-102)
<p>3. Head of Household Identification</p>	<ul style="list-style-type: none"> • Government Issued ID for the Head of Household. If Government Issued ID is not available, detailed notes of the staff member’s attempt to obtain this requirement must be detailed in the client’s case notes.

4. Service Engagement Records	<ul style="list-style-type: none"> • Case notes or other documentation of services provided • Notes must be dated and detail housing goals, direct assistance provided, housing plans and referrals.
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C. Records to Maintain - Program Participants Receiving Legal Services

Record	Acceptable Forms of Documentation
1. HSED Eligibility	<ul style="list-style-type: none"> • HSED Eligibility Form (CP-101)
2. Release of Information	<ul style="list-style-type: none"> • HSED Consent Form (CP-102)
3. Head of Household Identification	<ul style="list-style-type: none"> • Government Issued ID for the Head of Household. If Government Issued ID is not available, detailed notes of the staff member’s attempt to obtain this requirement must be detailed in the client’s case notes.
4. Service Engagement Records	<ul style="list-style-type: none"> • Case notes or other documentation of services provided • Notes must be dated and detail housing goals, direct assistance provided, housing plans and referrals.

D. 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"> • Bills paid • Contracted legal staff • Supplies purchased 	<ul style="list-style-type: none"> • Invoice (detailed invoice of legal services required) • Receipt 	<ul style="list-style-type: none"> • Invoice/Receipt • Canceled checks, bank statement with HSED payments highlighted • *Legal services cannot exceed a maximum cap of \$150 dollars an hour
<ul style="list-style-type: none"> • Employee Compensation 	<ul style="list-style-type: none"> • Detailed timesheets, signed by both supervisor and employee detailing time worked under the HSED grant. 	<ul style="list-style-type: none"> • Paystub listing the pay period, employee name and last four digits of employees’ SSN • Timesheets signed by supervisor and employee detailing eligible HSED activities • Bank statement with cleared HSED payments highlighted
<ul style="list-style-type: none"> • Mileage costs <p><i>*not to exceed the state of Missouri’s standard mileage rate of \$0.655/mile.</i></p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Check register or credit card statement with payments made by HSED highlighted and/or returned checks log

[End of Recordkeeping Requirements]

Termination and Grievance Procedures

All HSED 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 HSED. 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

All HSED grantees should develop or update current written prioritization standards in relation to administration of its HSED 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 50% AMI) and prioritization based on employment status (households with one or more individuals that have not been employed for a 90-day period). These policies and procedures for assessing eligibility for assistance and determining and prioritizing which eligible individuals and families will receive assistance should also include prioritization of households currently in eviction proceedings. 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 HSED 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 HSED. The information reviewed is gathered from the CP-106 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 HSED and any other programmatic documentation. The financial information reviewed is gathered from the CP-106 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 HSED 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.

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 HSED 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

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

1. Final Expense Detail (CP-106) showing a full expenditure of funds.
2. Final Demographic Reporting (CP-107).
3. Grant Close Out Form (CP-108)

All complete and final close out information is to be submitted no later than the deadlines outlined above in the Program Timeline. Any funds that are not backed up by the deadline will be recaptured, and any disbursed funds that are not backed up shall be repaid to MHDC. The final date to incur or pay HSED expenditures is December 31, 2024. All incurred and paid expenses must be reported to MHDC using CP-106 no later than the end of business on January 31, 2025.

Desk Guide and/or program procedures are subject to change, at the discretion of MHDC in accordance with Treasury Guidance.

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.

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.

Site Contact Form (CP-100)

Description: This form 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.

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, Workers 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.

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 HSED document, the document will be rejected.

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 or letter 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 HSED 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 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).

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, organizations are required to submit updated information as changes arise.

Completion Instructions: Grantees are required to register/update their organization's information on the United Way 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/get-listed/>

Sources and Uses (CP-113)

Description: The Sources and Uses details the program budget and how HSED funds will be used for the grant funding period.

Completion Instructions: Agency must submit this form at the time of application submission. All sources of funding that are used in the program where HSED funds will be utilized must be listed in the "Sources" sections at the top of the document. The general uses of each funding source should be listed under the "Revenue Uses" column. Any uses of HSED funding should be eligible uses of the grant.

Eviction Relief Certification (CP-114)

Due Date: Completed before administering Eviction Relief assistance.
Required: Yes – For all staff administering Eviction Relief assistance.
Submission / Retention: Upload to Grant Interface.
Description: The Eviction Relief Certification is required for all staff who will administer the Eviction Relief component of the HSED grant. This is to be completed **after** staff have reviewed the HSED Eviction Relief Funded Agency Training.

Personnel Agreement to Comply with HSED Security Standards

Due Date: Completed before administering Eviction Relief assistance. Provided by Program Administrator.
Required: Yes – For all staff administering Eviction Relief assistance.
Submission / Retention: Upload to Grant Interface.
Description: The Personnel Agreement to Comply with HSED Security Standards is required for all staff who will administer the Eviction Relief component of the HSED grant and monitor Clearing House eligibility/data entry.

[End of Appendix A]

Appendix B – Agency Forms/Data Submissions

HSED Expense Detail Form (CP-106)

Due Date:	At minimum, the expense detail form is to be submitted quarterly.
Required:	Yes
Submission:	Submitted via Grant Interface.
Description:	This Expense Detail Form is used to submit a record of all grant eligible expenses as back-up against the agency disbursement.

HSED Monthly Reporting Form (CP-107)

Due Date:	By or on the 5 th day of every month for the previous month's data. If the 5 th falls on a weekend or holiday, reporting is due on the prior business day.
Required:	Yes
Submission:	Emailed to cp.submissions@mhdc.com
Description:	This monthly reporting form provides client level demographic data that MHDC is periodically required to provide to Treasury.

Clearing House Batch Upload Template

Due Date:	Within 72 hours of Eviction Relief payment on behalf of an eligible household.
Required:	Yes
Submission:	Uploaded to the MHDC Clearing House
Description:	The Clearing House Batch Upload Template must be used to upload payment and client data into the MHDC Clearing House within 72 business hours of Eviction Relief disbursement.

Grant Close-Out Form (CP-108)

Due Date:	January 31, 2025
Required:	Yes
Submission:	Emailed to cp.submissions@mhdc.com
Description:	Provides MHDC with program data for the grant year and gives grantees the opportunity to provide program feedback.

[End of Appendix B]

Appendix C – Client File Forms

Head of Household (HoH)

Government Issued Identification

Due Date:	Completed at first instance of assistance with HSED.
Required:	Yes
Submission/Retention:	Retained in client file
Description:	The HoH's Government Issued Identification is required for each recipient of HSED Services (Case Management, Legal Services, and Eviction Relief). If the recipient does not have a Government Issued ID, staff must detail attempts to obtain this document in the case notes retained in the client file.

HSED Eligibility Form (CP-101)

Due Date:	Completed at first instance of assistance with HSED, and again at second instance of Forward Rent assistance, if applicable.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	This form is intended to be used to verify HSED eligibility according to Treasury guidelines, certifying both income and housing status. This form will also be available in Spanish at: https://mhdc.com/programs/community-programs/covid-relief/

HSED Consent Form (CP-102)

Due Date:	Completed at first instance of assistance with HSED.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	The Consent Form is a release of information that authorizes MHDC to review the household's file. The consent form must be completed and signed by head of household before first instance of HSED 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 will also be available in Spanish at: https://mhdc.com/programs/community-programs/covid-relief/

Eviction Relief Eligibility Form (CP-112)

Due Date:	Completed at first and second instance of assistance with HSED Eviction Relief to determine eligibility. CP-101 must be signed and dated within 90 days before payment is made.
Required:	Yes – For Eviction Relief recipients only.
Submission / Retention:	Retained in client file (if receiving Eviction Relief assistance)
Description:	The Eviction Relief Eligibility Form must be included in each client file (if receiving Eviction Relief assistance) for purposes of determining direct assistance eligibility. This form includes a Duplication of Benefits check through the MHDC Clearing House and must be completed and signed by both the Head of Household, and an Agency Representative.

Clearing House Verification Tool (CP-116)

Due Date:	Completed at first and second instance of assistance with HSED Eviction Relief to determine eligibility.
Required:	Yes – For Eviction Relief recipients only.
Submission / Retention:	Retained in client file (if receiving Eviction Relief assistance)
Description:	The Clearing House Verification Tool must be included in each client file (if receiving Eviction Relief assistance) for purposes of determining direct assistance eligibility. This form assists with a Duplication of Benefits check through the MHDC Clearing House and must be completed by a certified Agency Representative to determine eligibility.

[End of Appendix C]