



Family Homeless Prevention and Assistance Program Guide

July 1, 2019 – September 30, 2023

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Chapter 1 – Introduction

The Family Homeless Prevention and Assistance Program (FHPAP) was established in 1993 by the Minnesota Legislature to assist families with children, single adults and youth who are homeless or at imminent risk of homelessness. In 2016, the Minnesota Legislature amended FHPAP statute to include tribal governments as eligible FHPAP grantees. Minnesota Housing is the agency administrator of FHPAP funds, and funding is contingent upon approval by the Minnesota Legislature. Funds are awarded through a competitive RFP process, and current funding reaches all 87 Minnesota counties and eleven tribal nations.

Minnesota Housing created this guide, which outlines FHPAP requirements and steps on how to implement FHPAP funded projects.

Chapter 2 – Purpose

2.01 Preventing and Ending Homelessness

In 2013, Minnesota adopted its [Plan to Prevent and End Homelessness](#), which incorporated strategies and actions with the goal of ending chronic, veteran, and family and youth homelessness. Effectively ending homelessness means preventing homelessness whenever possible and if homelessness does occur, that it is rare, brief, and nonrecurring (one-time). The outcomes of FHPAP, which align with the state plan, are to:

- Reduce the number of people who become homeless for the first time (*Prevent*)
- Reduce the number of people who experience homelessness (*Rare*)
- Reduce the length of time people experience homelessness (*Brief*)
- Reduce the number of people who return to homelessness (*One-time*)
- Increase equitable outcomes for households who are disparately impacted by homelessness (*Equity*)

FHPAP is intended to complement the existing network of services in the community's Continuum of Care and provides funding for four interventions designed to address or prevent homelessness, which include: 1) Coordinated Entry; 2) Street Outreach; 3) Prevention; 4) Rapid Re-housing. Refer to Chapter 4 for further information.

Funds can be used for direct assistance (rent, utilities and other expenses to address housing crisis) or services (housing navigation, case management, outreach staff, coordinated entry assessment) to households who at or below 200 percent of the Federal Poverty Guidelines and homeless or at imminent risk of homelessness. Funds may also be used for eligible administrative expenses, not to exceed 15 percent as allowed in Section 4.05.

2.02 Statute

The 2018 Minnesota [Statute](#) §462A.204 Family Homeless Prevention and Assistance Program provides requirements as they pertain to selection criteria, project design, authorized uses of the grant, and the requirements for an advisory committee.

Chapter 3 – Eligibility Criteria

3.01 Eligible Applicants

Eligible applicants include:

- Tribal nations
- Twin Cities metropolitan counties, which include Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties
- Non-metropolitan areas, which include a county, group of contiguous counties jointly acting together, or a community-based non-profit organization with a sponsoring resolution from each of the county boards located within the operating jurisdiction.

3.02 Eligible Recipients

To qualify for FHPAP assistance, households must be:

- Household income must be at or below 200 percent of Federal Poverty Guidelines
- Minnesota resident or a household otherwise approved by Minnesota Housing
- Be homeless or at imminent risk of homelessness and in need of services and/or financial assistance due to a housing crisis

3.03 Target Populations

FHPAP serves all populations that are homeless or are at imminent risk of homelessness including: Families with children, singles, and youth/unaccompanied youth (under age 25). If the project does not serve all three populations, the Applicant must demonstrate that other funding resources are available to meet the need.

Applicants are encouraged to continually monitor community need by analyzing local data sources such as the Coordinated Entry Priority List, HMIS, Point in Time (PIT), etc. and ensure funds are being targeted to those households most likely to become homeless or to remain homeless without assistance.

3.04 Equity

An underlying strategy in the Minnesota’s Plan to Prevent and End Homelessness is to address the racial disparities that exist within Minnesota’s homeless population, and that we will, in partnership with culturally specific communities, including Tribal Nations, prioritize funding for efforts most successful at improving housing stability for communities disproportionately impacted by homelessness.

Applicants are strongly encouraged to plan efforts to serve those populations most disparately impacted and to ensure services are culturally-specific to better reflect needs of those being served.

Chapter 4 – Intervention and Activities

Applicants can apply for funding for up to four intervention categories: Coordinated Entry, Street Outreach, Prevention, and Rapid Re-housing. The tables below include a description of each category as well as types of services and assistance that can be provided.

4.01 Coordinated Entry

The Department of Housing and Urban Development (HUD) defines coordinated entry as: A centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area (encompassed by the CoC), is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool

Intervention #1	Coordinated Entry	
Description of Model	Provide homeless or at risk of homeless assessments, information and connect FHPAP-eligible households to applicable resources	
Client Eligibility	Homeless or at imminent risk of homeless households	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> • Homeless Assessment • Diversion • Referrals 	<ul style="list-style-type: none"> • Basic needs • Transportation assistance such as bus tokens or bus cards (this must be tied to a housing outcome)

4.02 Street Outreach

Street outreach is an activity that is **intended to provide emergency services and engagement** intended to link households who are homeless or at imminent risk of homelessness with available shelter, housing, and/or critical health and supportive services. Street outreach and engagement activities actively reach out to those experiencing or who are at risk of homelessness to households not otherwise connected to the homeless response system.

Examples of FHPAP street outreach may include responding to requests from police or other referral sources to connect with a household living outside or in their car, visiting known locations where homeless people may live, such as vacant structures or encampments, or connecting with households at youth drop-in sites, free meal sites, food shelves, etc.

Intervention #2	Street Outreach	
Description of Model	Emergency services and engagement intended to link households who are homeless or at imminent risk of homelessness with available shelter, housing, and/or supportive services.	
Client Eligibility	Homeless or precariously housed households not otherwise connected to the homeless response system. This can include doubled up households.	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> • Safety provisions • Assessment and referrals to other programs and services • On-site medical screening and assessment • Population specific information/services, such as: <ul style="list-style-type: none"> ○ Vets: MACV ○ Domestic Violence/Sexual Violence/Trafficking ○ Youth 	<ul style="list-style-type: none"> • Basic needs (food, clothing, blankets) • Transportation assistance such as bus tokens or bus cards

4.03 Prevention

Prevention is intended to **reduce the number of people who become homeless** and includes a set of strategies to assist people in maintaining permanent housing or divert them from entering the homeless system. Service strategies are focused on addressing the immediate housing crisis and can be integrated with other mainstream resources to address more long-term needs. FHPAP assistance is designed to assist people at imminent risk of homelessness (or doubled up), and assistance is targeted toward those who will most likely experience homelessness within 30 days if they do not receive assistance. While financial assistance may be one-time only, it can be provided for a longer term.

Note that while doubled-up households are homeless by Minnesota’s definition, they will be entered in HMIS in the Prevention category. Refer to Chapter 7.06 for more information.

Intervention #3	Prevention (this can include doubled up households)	
Description of Model	Temporary financial assistance and/or supportive services to assist people in maintaining existing permanent housing, relocation to more appropriate permanent housing, and/or diverting them from entering the homeless system. Households must meet FHPAP eligibility criteria.	
Client Eligibility	Households, based upon the Minnesota Homelessness Prevention Assessment score, who will most likely become homeless within 30 days if they do not receive assistance	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> • Minnesota Homelessness Prevention Assessment tool • Referral to resources, including but not limited to: cash and non-cash benefits, legal aid, child care, mental health/chemical health, employment and financial assistance • Budgeting assistance • Tenant-landlord mediation 	<ul style="list-style-type: none"> • Rental assistance • Mortgage assistance • Utility assistance (including past due) • Transportation assistance (this must be correlated with a housing stability outcome) • Undesignated assistance, such as identification needed to apply for employment (this category should be used rarely and must be correlated with a housing stability outcome)

Effective July 1, 2019, grantees will be required to assess households using the Minnesota Homelessness Prevention Assessment tool. Households that are homeless or doubled up and are also not eligible to be assessed using the homeless assessment tool through coordinated entry must be assessed utilizing the Minnesota Homelessness Prevention Assessment tool. Effective April 28, 2023, with the exception of school stability projects such as Homework Starts with Home, grantees are not required to utilize the Minnesota Homeless Prevention Assessment Tool (MPAT).

The Minnesota Homelessness Prevention Assessment tool is designed to assist FHPAP program staff with two functions: 1) verify eligibility for homelessness prevention assistance, and 2) identify the most vulnerable households most likely to experience homelessness if they do not receive assistance. In assisting with these two activities (verifying eligibility and targeting the most vulnerable households), the tool will support Minnesota’s goal of reducing the number of people who become homeless. Note that this tool is designed to be administered by staff and should not be completed by the prospective participant.

Households assessed will score in one of four categories:

- Light touch
- One-time assistance
- Short-term assistance (up to six months)
- Medium term assistance (seven-24 months)

Grantees are not required to utilize funding for all four categories and are encouraged to leverage other funding resources, and in addition, target their resources to best meet the community need and to those households most likely to experience imminent homelessness without assistance.

4.04 Rapid Re-Housing

Rapid Re-housing's fundamental goal is to **reduce the amount of time people spend homeless** and is a Housing First intervention designed for households to quickly exit homelessness and return to permanent housing. Rapid re-housing assistance is typically tailored to the unique needs of the household.

Rapid Re-housing can provide short- to medium-term (up to 24 months) of rental assistance and services for singles, youth or families and should be offered without preconditions (such as employment, income, absence of a criminal record or poor credit, or sobriety). FHPAP Rapid Re-housing is more aligned with serving households short-term (zero to six months of assistance); however, it is possible assistance can be provided for a longer period of time if assessment determines the household needs continued assistance. An example may be if grantees choose to utilize Rapid Re-housing as a bridge program for persons who score for more intensive interventions or services but for whom those more intensive programs are not available at the time of referral. It is also possible that a community does not have other Rapid Re-housing programs, which make FHPAP attractive for both short- and medium-term.

While Rapid Re-housing can be a highly successful intervention for many households, it is not designed to address all household needs or necessarily end their situation of poverty, and it is recommended that households not be denied Rapid Re-housing assistance strictly based upon their current household income.

The three components of Rapid Re-housing include:

- Housing navigation assistance
 - Provide housing search assistance, contact and recruit landlords, assist household with completing applications, etc. (Refer to 4.07 Supportive Service Activities: Housing Navigation)
- Case management and services
 - Provide appropriate and time-limited services and supports, including services such as assessing barriers to housing stability, making referrals and connections to community resources, monitoring housing stability (refer to 4.07, Supportive Services Activities: Case Management).
- Rent payment and move-in assistance
 - Provide financial assistance such as rent, security deposit or application fees to move into permanent housing as rapidly as possible. (Refer to 4.05, Eligible Activities: Direct Financial Assistance).

Intervention #4	Rapid Re-housing	
Description of Model	Services and/or financial assistance to help quickly rehouse households experiencing homelessness. Households must meet FHPAP eligibility criteria.	
Client Eligibility	<ul style="list-style-type: none"> • Currently homeless • Households at or below 200% of federal poverty guidelines • No other means to resolve crisis, likely to remain homeless but for this assistance. 	
Program Strategies (minimum expected)	Service Set	Assistance Set
	<ul style="list-style-type: none"> • Housing navigation assistance • Case management including: <ul style="list-style-type: none"> ○ Financial management ○ Legal ○ Life skills ○ Employment training and support or connections to such services ○ MH/CD services ○ Connections to mainstream resources ○ Tenant education 	<ul style="list-style-type: none"> • Rental Assistance (including) <ul style="list-style-type: none"> ○ Monthly rent ○ First/last month's rent ○ Deposit ○ Housing application fees
Program Strategies (additional)	Service Set	Assistance Set
	<ul style="list-style-type: none"> • Landlord mediation, education and engagement • Family reunification • Legal assistance • Established services/partnerships for immigrant populations 	Financial assistance may include: <ul style="list-style-type: none"> • Utility assistance (including past due) • Transportation assistance (when directly connected to housing stability)

Some CoCs offering Prevention and/or short-term Rapid Re-housing assistance (zero to six months of financial assistance) may choose to apply defined income standards for enrollment determinations. Grantees are encouraged to consult with their CoC to make determinations about whether to implement income requirements. Minnesota Housing does not mandate income requirements in Prevention or Rapid Re-housing assistance beyond the eligibility criteria.

4.05 Eligible Activities

Supportive Services

Supportive services include staffing and related costs, as outlined below, for providing case management, housing navigation, HMIS support, and management staff. In 2009, the former Minnesota Interagency Task Force on Homelessness identified recommended components of case management that are outlined in Section 4.07.

Eligible supportive services costs include:

- Salary and benefits
- Mileage
- Supplies, copies, postage directly related to the program
- Training
- Equipment, e.g. phone, computer (note that costs allocated must be pro-rated and cannot exceed the staffing full time equivalent (FTE) assigned to the grant).

Grantees should have no more than 50 percent of their total budget dedicated to supportive services; however, if the grantee can provide rationale, they can request in excess of the 50 percent cap. An example may include increasing supportive services and decreasing direct assistance, such as rental assistance, if that assistance type is available through another funding source. If requesting to exceed the supportive services cap, grantees should:

- Consult with Minnesota Housing FHPAP staff prior to submission of the request to exceed the cap
- Consult with and receive approval from the grantee's advisory committee before requesting to exceed the cap and making a request to Minnesota Housing staff
- Submit a request in writing to Minnesota Housing substantiating why the request to exceed the cap is needed and what percentage the grantee is requesting for supportive services
- Minnesota Housing will inform grantees whether this request is approved or denied

Direct Financial Assistance

Direct financial assistance is funding used to stabilize a household and prevent a homeless episode, or to rehouse a household into permanent, stable housing. Direct financial assistance (per HMIS definitions) includes:

- Rent payment assistance
- Mortgage payment assistance
- Rental deposit assistance
- Utility bill payment assistance, e.g., assistance for utilities such as gas, electric
- Transportation expense assistance, e.g., bus tokens, gas card, cash assistance for car repairs

- Undesignated temporary financial assistance: This can be used for other cash assistance such as payment for identification in order to obtain employment or a social security card needed to apply for housing. These funds should be minimally used and must be directly linked to a housing stability outcome.

Direct financial assistance costs are an eligible expense only if the assistance is needed due to a housing crisis and correlates with a housing stability outcome. This should be well documented in the household file.

Administration

Grantees must ensure that administrative costs do not exceed the percentage defined in their Grant Contract Agreement or 15%, whichever is less.. Eligible administrative costs include:

- Supplies
- Accounting, human resources, information technology support, audit fees, insurance
- Personnel (HMIS data staff can be included in either the administration or the supportive service category depending on who is responsible for data entry)
- Stipends to persons with lived experience on the advisory committee
- Other types of expenditures directly related to administering the program

4.06 Ineligible Activities

Activities that are not eligible under this grant include:

- To acquire, rehabilitate, or construct emergency shelters, transitional or permanent housing
- Payment for more than 24 months of rental assistance or supportive services except if utilizing FHPAP funds allocated under 2023 Minnesota Session Laws Chapter 20, Section 1 or being served by a school stability project, i.e. Homework Starts with Home.
- Payment for operating costs of emergency shelter including hotel/motel expenses. Note that payment for an emergency shelter staff who is specifically working with FHPAP households for housing search assistance is allowable.
- Payment for operating and supportive services costs of permanent supportive housing

4.07 Supportive Services Activities

Case Management

The former Minnesota Interagency Task Force on Homelessness developed the following guidelines to establish a consistent use of the term “case management” when describing the level of support provided to participants served by homelessness assistance programs.

Case management must include, for each household and conducted with the person receiving the case management, the following activities:

- Assessment: Work collaboratively with the person to identify strengths, resources, barriers and needs in the context of their local environment
- Plan Development: Work collaboratively with the person to identify strengths, resources, barriers and needs in the context of the local environment
- Connection: Obtain for the individual necessary services, treatment and supports
- Coordination: Bring together all of the service providers in order to integrate services and ensure consistency of service plans
- Monitor: Evaluate with the person their progress and needs, and adjust the plan as needed.
- Personal advocacy: Intercede on behalf of the person or group to ensure access to timely and appropriate services.

The activities listed above are the activities that, taken together, make up case management. These case management activities will vary in a number of ways. The following variables are related to how case management is provided as opposed to what case management actually is:

- Intensity (frequency of contact; client-staff ratios)
- Duration (from brief to time-limited to open-ended)
- Focus (from narrow to targeted to comprehensive)
- Availability of staff (from scheduled office hours to 24-hour availability)
- Location of services
- Staffing patterns (from individual caseloads to interdisciplinary teams with shared caseloads, depending on the need of the client)

In addition to the above components of case management, there are other activities often offered that enhance the core case management activities. These six activities can be divided into two broad categories, client specific activities and system activities.

Client Specific Activities:

- Outreach and engagement: To attempt to connect with people not currently accessing services
- Direct service: To provide services directly to the person (budget counseling, housing search assistance (housing navigation). Refer below for further information on housing navigation.
- Crisis intervention: To assist people in crisis in order to stabilize, through direct interventions, and to mobilize needed support and services
- Follow-up: To maintain contact with the person/household after completion of services in order to track stability and provide additional services, if needed

System Activities:

- System advocacy: To intervene with organizations in larger systems in order to promote more effective, equitable and accountable services to a client group (to be distinguished from personal advocacy above)
- Resource development: To attempt to create additional services or resources to address the needs of participants

The intensity of case management may vary depending upon the type of service households are receiving, i.e. one-time, short term or medium term assistance.

Housing Navigation

Housing navigation services, whether it is a role of a case manager or a dedicated position, is an eligible FHPAP expense and is a need identified in the [Report of the Governor's Task Force on Housing \(August 2018\)](#).

The role of the housing navigator is to minimize the number of days homeless by assisting the household in obtaining housing as quickly as possible. If considering requesting funds for housing navigation, note that while services may be short-term, they are intensive in nature and usually involve multiple contacts, including face-to-face, with the household, and involve much more than the simple provision of housing listings.

Activities of housing navigation include:

- Landlord recruitment, including outreach to an organization's network of existing landlords
- Utilizing housing search engines to locate opportunities
- Attaining ongoing communication with landlords to engage, maintain a positive relationship with, and mitigate any issues that may arise
- Keeping an active list of subsidized housing waiting list openings, including project-based
- Assisting households in completing housing applications
- Assisting household in obtaining application fees, if needed
- Transporting the household to housing appointments
- Assisting the household in communicating to a potential landlord any housing barriers
- Providing tenant education on landlord and tenant rights and responsibilities
- Expediting the move-in timeline when feasible, between the date of acceptance and lease signing

4.08 School Stability

Minnesota statute §462A.204 subd 8, school stability, authorizes the use of FHPAP grant funds for a school stability project to secure stable housing for families with school-aged children (pre-kindergarten through grade 12) who have moved frequently, and also for unaccompanied youth.

Minnesota Housing and the Heading Home Minnesota Funders Collaborative, in partnership with the Minnesota Department of Education, have utilized subdivision 8 to establish the Homework Starts with Home school stability project. For more information see the Homework Starts with Home web page.

In addition, the McKinney-Vento Homeless Education Assistance Improvements Act of 2001 ensures families have the opportunity to maintain education stability for their student, which is key to their educational trajectory and success. One of the priorities of the act is the provision of transportation services to allow students experiencing homelessness to remain in their school of origin, which is defined as the school that the student attended when they first experienced homelessness.

Because school stability is important for all homeless families with children as well as unaccompanied youth, grantees are encouraged to assess whether children of homeless households are receiving transportation to their school or origin, and if not, assist in connecting households with their school district homeless liaison.

Refer to the [Minnesota Department of Education](#) website for more information on McKinney-Vento, including a list and contact information for the state's district homeless liaison staff.

Chapter 5 – Advisory Committee

5.01 Statute Requirement

As outlined in Minnesota Statute §462A.204 subd 6:

Each grantee shall establish an advisory committee consisting of a homeless advocate, a homeless person or formerly homeless person, a member of the state interagency council on homelessness, local representatives, if any, of public and private providers of emergency shelter, transitional housing, and permanent affordable housing, and other members of the public not representatives of those specifically described in this sentence.

5.02 Membership

Grantees should consider the requirements of the statute when establishing or enhancing their advisory committee. At a minimum, members should include:

- A person with lived experience, i.e. homeless or formerly homeless individual
- A homeless advocate
- A representative from the local tribal nation, if applicable
- A member of the Minnesota Interagency Council on Homelessness
- Local representatives, if any, of public and private providers of emergency shelters, transitional housing and permanent affordable housing
- Housing Trust Fund administrator

It is also recommended, when possible, that advisory committee membership include:

- Local law enforcement
- Landlords
- School liaison staff
- Legal aid
- County staff
- Employment organizations
- Coordinated entry staff

5.03 Roles and Responsibilities

Grantees are expected to consult with their advisory committee on a regular basis regarding the design, implementation and ongoing evaluation and redesign of the project. Two or more grantees may join together to establish a single advisory committee. Advisory committee responsibilities include:

- Designing or refocusing the grantee’s emergency response system
- Developing project outcome requirements
- Assessing the short- and long-term effectiveness of the project in addressing the needs of families, singles and youth who are homeless or at imminent risk of homelessness
- Monitoring of grantees and subgrantees, at a minimum of annually
- Identifying and developing innovative solutions to the barriers homeless or at imminent risk of homeless households face and to provide services to address this
- Ensuring providers are offering culturally-responsive services to those populations disproportionately impacted by homelessness
- Monitor expenditures and ensure alignment with the proposal as well as that funds will last throughout the biennium
- Advisory committee voting members can authorize changes

Advisory committee meetings should be held, at a minimum, quarterly, although more frequent meetings are recommended. Meetings should occur at a time and location that allows for the greatest access by members. Access to newer technology (such as Zoom or GoToMeeting) that provides the opportunity for teleconferencing is ideal in order to encourage attendance by those who otherwise might have to travel a long distance.

5.04 Bylaws

Advisory committees should develop written bylaws that may include, but are not limited to:

- Meeting frequency and scope
- Membership composition, including both funded and non-funded members
- New member recruitment and orientation
- Election of officers, terms and job descriptions
- Voting process and quorum requirement
 - Ensure that no more than 20 percent of voting members of the advisory committee are representatives of organizations that receive FHPAP funding
 - Regular attendance of the advisory committee is imperative to the program’s performance. It is recommended that grantees require voting members attend a minimum number/percentage of meetings, depending upon the frequency in which meetings occur:

Meeting Frequency	Meeting Requirement
Monthly	50% (6 meetings annually)
Bi-monthly	67% (4 meetings annually)
Quarterly	75% (3 meetings annually)

- Formation of subcommittees, defining their purpose and decision-making process. Examples of subcommittee activities include: Prevention and Outreach, Rapid Re-housing, Evaluation, Equity
- Conflict of Interest
 - Bylaws should include a conflict of interest statement or policy. For example, subgrantees should disclose their status and abstain from voting on any issues such as how much funding should be awarded to each subgrantee.

5.05 Commitment to Equity

Advisory committees should be committed to addressing inequities as it pertains to those populations disproportionately impacted by homelessness, and in targeting their homeless response to address those inequities. Factors to consider:

- Identification of subgrantees based in part of their ability to provide culturally-specific services and whose staffing represents the population served
- Providing technical assistance to new subgrantees in areas such as data collection and reporting, case file documentation, financial reporting, etc.
- Ensuring advisory committee members and subgrantees participate in equity training
- Ensuring advisory committee members are representative of populations served
- Consulting with tribal nations, if they are located in your region
- If populations do not access services in a traditional manner, such as shelters or coordinated entry access points, providing alternative avenues to outreach and identifying those that need homeless or prevention assistance
- Persons with lived experience are engaged in your planning and evaluation and are provided stipends for their participation

Chapter 6 – Preparing the Application

Minnesota Housing issues a Request for Proposals (RFP) every two years. Minnesota Housing is interested in how the applicant fully engages its advisory committee and the community in its planning process. In addition, the agency is interested in program design and how it meets the needs of the community, including those disparately impacted by homelessness, whether it is aligned with CoC priorities, and how FHPAP compliments other funding resources in a particular region.

6.01 Planning

Minnesota Housing expects applicants to have developed a fair and transparent process for soliciting providers to meet the needs identified in their community. Applicants will conduct the following activities:

- Conduct a needs assessment of homelessness and those at risk of homelessness in your community including the use of multiple data sources, analysis of trends, and comparison of homeless numbers and population types past to present, including those populations disparately impacted by homelessness
 - It is recommended that the needs assessment be concluded a minimum of 120 days prior to the issuance of the Minnesota Housing FHPAP Request for Proposals to ensure adequate time for data analysis and planning.
- Engage tribal governments (if in the service area) in discussions, planning and project design

NOTE: Minnesota and the federal government recognize the existence of the following reservations: Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, Grand Portage Band of Chippewa, Leech Lake Band of Ojibwa, Lower Sioux Community, Mille Lacs Band of Ojibwa, Prairie Island Mdewakanton Dakota Community, Red Lake Nation, Shakopee Mdewakanton Sioux Community, Upper Sioux Community and the White Earth Nation
- Engage other service and housing providers, agencies, local governments and schools
- Engage persons with lived experience in the planning and implementation of your project, such as conducting focus groups or administering surveys
- Plan for alignment with the Continuum of Care, including coordinated entry and performance measures
- Develop strategies that meet the needs identified in the community needs assessment
- Identify additional funding resources that can be used to meet the local need, including philanthropic, other state funding, and federal resources
- Issue a local Request for Information (RFI) or RFP to regional providers of homeless and prevention services to solicit proposals
 - Ensure communication reaches a broad audience and is conducted through multiple venues such as email, notification on the grantee web site, newspapers, mailings, etc.

- Ensure outreach to providers of culturally-specific services to those populations disproportionately represented in the homeless population
- It is recommended your RFI or RFP be issued no later than 60 days prior to the issuance of Minnesota Housing’s FHPAP RFP
- Develop and implement a transparent process and criteria for selecting service providers (both grantees and subgrantees) best suited to implement strategies identified in your planning process

6.02 Coordinated Entry

A coordinated entry system represents a new approach to coordination and management of a Continuum of Care’s (CoC) housing crisis response system. Coordinated entry enables CoC providers and homeless assistance staff to make consistent decisions from available information in order to efficiently and effectively connect people in crisis to interventions that will rapidly end their homelessness. The coordinated entry approach also aligns with state of Minnesota’s goals to transform crisis response systems in order to improve outcomes for people experiencing a housing crisis.

The [CoC Program interim rule](#) (24 CFR 578) released by HUD in 2012 requires that CoCs establish and operate a “centralized or coordinated assessment system,” hereafter referred to as a coordinated entry system. The rule defines coordinated entry as:

A centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. [Such a] system covers the [CoC’s] geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool (24 CFR part 578.3).

Applicant Requirements

Applicants will be required to actively participate with and receive referrals from their local coordinated entry system. Participation includes, but is not limited to:

- Projects providing written standards for client eligibility and enrollment determination to the coordinated entry administrative entity
- Projects communicating project vacancies to the coordinated entry administrative entity
- Projects must follow their CoC’s rejection referral policy, and while they may deny or reject referrals from the defined coordinated entry access point, service denials should be infrequent and documented.
- Projects should exercise due diligence by making multiple attempted contacts before referring a household back to the coordinated entry system. Refer to your CoC’s coordinated entry policies for further guidance.
- Projects aligning entry/access points with local coordinated entry defined access points
- Projects ensuring that all FHPAP activities are represented in their local coordinated entry system

- Using coordinated entry as the sole source of referrals for homeless households
- Assisting the CoC to incorporate access for prevention households into the coordinated entry system

6.03 Outcomes and Indicators

Minnesota Housing will measure progress toward the specific outcomes below. The indicators will be pulled from data in Minnesota’s Homeless Management Information System (HMIS), as outlined below.

NOTE: Households experiencing homelessness or at imminent risk of homelessness will have access to supportive services and assistance to resolve their crisis:

Outcomes

- **Outcome #1:** The percentage of households receiving assistance who do not experience homelessness (HUD definition) (*Prevent*)
- **Outcome #2:** The percentage of households who exit to permanent, stable housing by race, ethnicity and household type (*Rare*)
- **Outcome #3:** The length of time from enrollment to housing placement (*Brief*)
- **Outcome #4:** The percentage of households served who do not return to homelessness by race, ethnicity and household type (*One-time*)
- **Outcome #5:** Intake demographics of the households served compared to exit demographics by destination (e.g. if the program serves 60 percent of African American clients, are 60 percent of the program’s positive housing outcomes going to African Americans?) (*Equity*)

Outputs

- The numbers of households served by race, ethnicity and household type

Grantees may choose to establish additional outcome indicators that reflect their local program. Grantees will be asked to discuss the results of these outcome indicators in the narrative report(s).

6.04 Preliminary Practice Models

Several state agencies and the Heading Home Minnesota Funders Collaborative (Funders Collaborative) identified key elements of a preliminary practice model, which is considered best practice for programs serving homeless or at risk of homeless households. Grantees should identify which elements of the preliminary practice model are currently being practiced, in the process of being implemented or not yet implemented. In addition grantees should identify at least one element for which there will be a plan for full implementation.

Equity Focus

Because homelessness impacts specific groups at disproportionate rates (e.g., American Indians, African Americans, LGBTQI youth), effective responses must be attuned to the populations at greatest risk for homelessness. While these populations vary across communities, identifying specific strategies to ensure that interventions for homeless individuals and families are **representative** of the populations being served **are culturally appropriate** and **responsive** to the specific needs of those populations is critical. **For example**, applicants may explicitly monitor the impact of interventions for populations disproportionately impacted by homelessness and define essential roles for stakeholders representing those populations in the design and implementation of programs.

“Nothing about us without us”

Individuals and families experiencing housing crises or homelessness have lived experience of how and where support systems are most effective and where they fail. Ensuring that this expertise informs and guides community responses to homelessness can increase the likelihood of deploying resources effectively, create shared ownership of solutions and leverage the resilience of people who have experienced homelessness. For this to occur, students and families with lived experience of homelessness must have meaningful ways to participate in shaping and implementing a community’s response to student homelessness. For example, applicants may create paid leadership and advisory positions for people with lived experience to help shape, implement and monitor programs serving families and students experiencing homelessness.

Early Identification and Trauma-informed Responses

Given the critical developmental needs of young people and the devastating impacts of homelessness and housing instability, the earliest identification of housing instability coupled with an affirmative response to those housing challenges can mitigate trauma that could otherwise occur. Often, implementing an effective response will require partnerships among entities that allow data sharing and deploy crisis-oriented resources to respond quickly to the specific circumstances of each individual or family. Given the traumatic nature of homelessness itself and the trauma that often precedes homelessness; these responses themselves must be trauma-informed and help support individuals and families in their recovery from trauma. For example, applicants may propose to conduct training for staff and community partners about the relationship between homelessness and trauma and adapt programs to enhance their use of trauma-informed approaches.

Two-generational Approaches

Two-generational (“2-Gen”) or whole-family approaches recognize that impacting outcomes for young people require supporting their parents, and vice versa. While many specific programs or funding streams focus on children or adults, 2-Gen approaches encourage looking at families holistically, focusing on outcomes that impact whole families, and whenever possible, combining programs and resources so that effective whole-family solutions are possible. 2-Gen approaches may include a mindset (e.g., considering parents and their children, not just one or the other), specific strategies (e.g., programs designed to support parents and children together), or systems-level organization (e.g., organizing services so that parents and children receive support simultaneously). For example, applicants may establish whole-family assessments of needs and strengths as part of routine intake

processes for local social service and economic assistance programs, with connections made simultaneously for parents and their children to appropriate programs for which they are eligible.

Progressive Engagement

A Progressive Engagement approach provides a structured way for services to be tailored dynamically to the specific and changing needs of individuals or families experiencing homelessness so that people receive the support that they need. At a systems level, this approach also ensures that resources are available to help support the greatest number of people possible. A Progressive Engagement approach involves assessing initial needs and providing modest support responsive to those needs. If that is sufficient to help the family stabilize, those supports can be continued or weaned as ongoing needs dictate. If initial supports are not sufficient, a Progressive Engagement approach identifies paths for increasing or diversifying the supports available. This process continues iteratively as long as needed until the family achieves stability. **For example**, applicants can structure most initial interventions as short-term responses and establish clear protocols for how services can be escalated, maintained or discontinued as family needs dictate, including referral processes and data sharing agreements among services providers as needed.

Housing First Orientation

Access to permanent housing is the fundamental solution to homelessness. A Housing First approach honors this fact by reducing barriers to accessing housing so that housing itself can serve as a platform for addressing any other challenges that someone experiencing homelessness may face. This approach is contrasted with a “housing readiness” approach that defines preconditions (e.g., sobriety, income, compliance with services) prior to receiving support to access permanent housing. For example, applicants can regularly review and wherever possible revise eligibility requirements for housing and homelessness programs that may preclude people experiencing homelessness from gaining access to housing resources or supports.

Leveraging Mainstream Resources

Resources specifically intended to serve people experiencing homelessness provide important tools in effective community responses to homelessness, but they are small compared to mainstream programs serving low-income or vulnerable populations. Mainstream programs may include health programs, housing voucher or public housing programs, economic assistance, employment and training programs, or other social services designed to help people obtain stability or improve well-being. While these programs are typically not focused specifically on people experiencing homelessness, their impact for people experiencing homelessness can be significant, particularly if they implement strategies to make these programs accessible and responsive to people experiencing homelessness. Given the way that funding streams, outcomes and lines of accountability are structured, linking mainstream programs to responses to homelessness often does not occur “naturally,” but instead requires deliberate action. **For example**, applicants can organize their responses to homelessness jointly with intake processes for mainstream economic assistance, public housing or other resources, so that each family can be connected with whatever resource(s) is/are most responsive to the family’s needs.

Continuous Improvement

Adapting and implementing effective solutions to homelessness requires ongoing refinement and attention to evolving needs and opportunities. Rather than expecting that a proposed intervention is complete or optimal as it was initially designed, a continuous improvement approach recognizes that ongoing participation from all stakeholders to identify successes, areas for improvement, and unanticipated needs will result in a stronger and more resilient long-term implementation. For example, applicants can describe oversight and governance approaches that encourage routine reflection and engagement of leadership and all stakeholders to help improve the impact of existing services and to do so iteratively and continuously.

Chapter 7 – Administrator Requirements

7.01 Subgrantees

Grantees are expected to enter into formal agreements with subgrantees and impose, at a minimum, the same expectations that Minnesota Housing requires of grantees. In addition, grantees should ensure that communication received from Minnesota Housing is relayed to subgrantees.

7.02 Financial

Once the grant agreement is approved and fully executed, Minnesota Housing will issue the first quarterly payment to grantees and subsequently will advanced payments each quarter thereafter. Quarterly payments are issued in advance to ease the financial burden on grantees, thus ensuring funds are available to households for the duration of the quarter.

Subgrantees should not receive advanced payment; rather they should be required to submit an invoice with supporting documentation for services and assistance performed prior to receiving reimbursement from grantees.

Grantees are required to demonstrate the funds have been expended on eligible activities and should work with their financial staff to set up a recordkeeping system to track grant funds and expenditures.

Grantees should not spend direct assistance on a ‘first come, first served’ basis, rather they should prioritize households based upon need and budget their direct assistance expenditures throughout the quarter.

7.03 Household Income

Grantees and subgrantees must determine income eligibility of households prior to providing assistance. Households must be at or below 200 percent of the federal poverty guidelines. Income is calculated based upon gross annual income.

Determining Income

The following income **is included** in income calculation:

- The full amount before payroll deductions of wages and salaries, overtime pay, commissions fees, tips, bonuses and other compensation for personal services
- The full amount of periodic payments received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts
- Payments in lieu of earnings such as unemployment or disability compensation, worker’s compensation and severance pay
- Public assistance payments such as cash assistance or Social Security.
- Periodic and determinable allowances such as alimony, child support and foster care payments

- Net income from the operation of a business or profession

The following types of income are **not included** in income calculation:

- Earned income of minors (age 17 and under)
- Income of live-in health aids
- Non-cash benefits such as child care or medical care assistance, and food support
- One-time cash gifts, for example a birthday
- Advance payments of the child tax credit authorized under the American Rescue Plan Act of 2021.
- Emergency rental assistance payments authorized under either Section 501 of Division N of the Consolidated Appropriations Act, 2021, or section 3201 of the American Rescue Plan Act of 2021, section 3201.

Verification of Household Income

There are two methods to obtaining household income: documents provided by the household or third party verification.

Household Documents

When possible, documentation of income should be obtained from the household. This includes:

- If employed, obtain a minimum of two pay stubs. Pay stubs should be the most recent and just prior to the date the household is seeking assistance. If a household has inconsistent income, for example, they work varied hours, obtaining additional pay stubs is recommended.
 - If a household is unable to provide two pay stubs, for example, if they obtained employment but have not yet started, third party verification from the employer is acceptable and should be clearly documented in the household file.
- Documentation of cash assistance such as Social Security income or public assistance
- Documentation of child support, alimony or foster care payments
- If a household is without income, obtaining a signed, self-certification of zero income is encouraged; however, in cases when this is not possible, verbal verification will suffice, although this should be clearly documented in the client file, such as on intake paperwork or a case note.

Third-Party Verification

Under this form of verification, a third party is contacted to provide information about the household's income. This may be preferable if providing the documentation poses a hardship on the household due to geographic distance, lack of access to technology, or they are unable to provide it in a timely manner.

- To obtain third party verification, the provider must obtain a signed release of information. Written verification is preferred; however, there may be times where the third party is unwilling to provide this and/or do so in a timely manner. In these instances, verbal verification is acceptable; however, this must be well documented in the client file, such as on intake paperwork or a case note. Information included should be the date the verbal verification was provided, the name of the individual providing the information and the entity they represent, as well as their contact information.

Calculating Income

When calculating income, keep in mind the following:

- Calculate annual income, rather than monthly, in order to align with the annual Federal Poverty Guidelines table
- Calculate annual income based upon 52 weeks in a year
 - For example, if a household is paid bi-weekly, their average bi-weekly pay should be multiplied by 26 weeks to obtain the annual income.
- Income calculation is determined using gross annual income, i.e. total pay before taxes and other deductions.

Below are examples on calculating income:

Income Calculation Examples	Income Calculation Steps
<p>Example #1:</p> <p>Household with two family members is employed and paid bi-weekly.</p> <p>Check #1: Gross income - \$589.32 Check #2: Gross income - \$640.00</p>	<p>Step 1: Total the two pay stubs - $\\$589.32 + \\$640 = \\$1229.32$</p> <p>Step 2: Divide total in Step 1 by two (# of pay stubs) $\\$1229.32/2 = \\614.66</p> <p>Step 3: Multiply \$614.66 by 26 weeks (bi-weekly average) $\\$614.50 \times 26 = \\$15,981.16$</p> <p>Household Annual Income (rounded) = \$15,981</p>
<p>Example #2:</p> <p>Household receives public cash assistance of \$537.00 per month and a housing allowance of \$110.00 per month</p>	<p>Step 1: Calculate monthly income $\\$537 + \\$110 = \\$647$</p> <p>Step 2: Multiply total in Step 1 by 12 months $\\$647 \times 12 = \\7764</p> <p>Household Annual Income = \$7764</p>
<p>Example #3:</p>	<p>Step 1: Total the four pay stubs $\\$823 + \\$588.24 + \\$646.29 + \\$481.00 = \\$2538.53$</p>

Income Calculation Examples	Income Calculation Steps
<p>Household has two adult family members and both are employed.</p> <p>Head of Household #1 has temporary employment and is paid weekly.</p> <p>Check #1: Gross income - \$823.00 Check #2: Gross income - \$588.24 Check #3: Gross income - \$646.29 Check #4: Gross income - \$481.00</p> <p><i>(In this example, because income can vary substantially, the provider requested additional pay stubs)</i></p> <p>Adult #2 earns monthly social security benefits in the amount of \$741.00</p>	<p>Step 2: Divide the total in Step 1 by four $\\$2538.53/4 = \\634.63 (average weekly income)</p> <p>Step 3: Multiply \$634.63 by 52 weeks $\\$634.63 \times 52 = \\$33,000.89$</p> <p><u>Annual income for head of household #1 = \$33,000</u></p> <p>Step 4: To figure Adult #2 annual income, multiply \$741 x 12 months $\\$741 \times 12 = \\8892</p> <p><u>Annual income for Adult #2 = \$8892</u></p> <p>Step 5: Determine combined annual income $\\$33,000 + \\$8892 = \\$41,892$</p> <p>Household Annual Income = \$41,892</p> <p><i>In this example, the household does not qualify for FHPAP assistance as their income exceeds 200 percent of federal poverty guidelines (current guidelines indicate the maximum income for a household of two is \$32,920).</i></p>

7.04 Monitoring and Evaluation

Monitoring of Grantees and Subgrantees

Grantees are expected to monitor subgrantee activities, project results, expenditures and outcome indicators, at a minimum, once per year. In addition, if a grantee is an FHPAP provider, the advisory committee should monitor the grantee a minimum of once per year. Outcomes of the monitoring visit should be communicated to the advisory committee and other stakeholders. The advisory committee should develop a written monitoring and evaluation plan to include:

- Advisory committee role with monitoring and evaluation
- How reports and results will be shared with the advisory committee
- How HMIS data quality review will be conducted
- How non-HMIS data will be collected and reported (if applicable)
- How site visits will be conducted
- How file reviews will be conducted
- Sample report, site visit and file review templates

Client Files

At a minimum, client files should contain the following:

- An application/intake date for the household seeking assistance
- Consent and release forms including:
 - A signed [HMIS Data Privacy Notice and Release of Information](#) for all household members over age 18
- A signed Tennesen warning that lists Minnesota Housing
- A separate Release of Information (ROI) for each individual or entity (for example, do not include a utility company and a landlord on the same ROI). An ROI should include:
 - The name and organization from which information is being requested
 - Specific information that can be provided and/or requested
 - An expiration date of one year or less
 - A client signature and date
 - It is recommended that a staff also sign the ROI
 - A separate Release of Information for each adult in the household should be obtained
- Case notes that are objective, chronological, accurate, concise, timely, and demonstrate action steps and outcomes
- Documentation of eligibility criteria including:
 - The household is at or below 200 percent of federal poverty guidelines. In addition to providing documentation of income, such as pay stubs or a statement of benefits, a demonstration of how annual income was calculated should be in the client file. Refer to Section 7.03, Household Income.
 - The household is experiencing a housing crisis
 - Documentation provided can include an eviction notice, utility shut-off notice, notice to vacate due to past due rent, etc.
 - Why the household does not have funds to pay for the crisis
 - This can be documented on an intake form, case note, etc.
 - Type and amount of FHPAP assistance provided
 - Evidence can include a purchase order, check copy, etc.
 - Documentation of crisis resolution
 - This can be included in closing paperwork, a case note, etc.

Grantees will be required to provide Minnesota Housing with a monitoring summary on the Annual Narrative Report; however, grantees are strongly encouraged to consult with Minnesota Housing staff in a timely manner any concerns that arise regarding the performance of a subgrantee, through monitoring or any other means, in areas such as financial management or service delivery. Further action may be recommended or required, such as providing additional monitoring or developing a performance improvement plan with the subgrantee.

State Monitoring of Grantees

Grantees and subgrantees are responsible for maintaining financial records that document the use of all FHPAP funds, including those used for supportive services, direct financial assistance and administrative costs. After grant term completion, grantees and subgrantees are expected to maintain all records for a minimum of six years after the grant term has ended. In addition to program financial records, client records must also be maintained for a minimum of six years after the grant term has ended.

In addition, Minnesota Housing reserves the right to review financial and client records during this period, and records must be made available upon request.

Minnesota Housing

Minnesota Housing will conduct annual monitoring of grantees, which will include:

- Client File Monitoring (refer to Section 7.04, Client Files, above)
- Financial reconciliation: Grantees will be required to submit a management letter from an audit, bank statements, payroll records, third party verification of payments such as invoices and receipts. More detailed information will be provided prior to monitoring.
- Overall program review, including grantee policies and procedures, governance, and administrative performance

Following the monitoring visit, Minnesota Housing staff will notify the grantee if follow up is required. An example of this could include obtaining additional documentation to verify household eligibility. Upon timely completion of follow-up items, Minnesota Housing staff will issue a monitoring review summary letter including grantee strengths, areas of concern, recommendations and requirements.

7.05 Reporting

The following outlines the reporting requirements during the grant term. The timely and accurate reporting requirements are taken into account when evaluating overall grantee performance. Refer to Appendix A: FHPAP Biennial Timeline for due dates.

Quarterly Expenditure and Outputs Report

Grantees will be provided with a Quarterly Expenditure and Outputs Report template that must be submitted after the completion of each reporting period. Reports will include expenses by funding category and the number of households and individuals served.

Grantee outputs should match the HMIS report. Occasionally HMIS data issues arise, and if this occurs, grantees should notify Minnesota Housing staff as soon as possible.

HMIS Reports

Grantees are required every six months to report to Minnesota Housing that their HMIS reports are accurate. The HMIS administrator then creates grantee level and statewide FHPAP reports for Minnesota Housing.

It is recommended that grantees establish an HMIS reporting deadline for subgrantees in advance of the due date established by Minnesota Housing in order to provide sufficient time to review data quality. Grantees should work with their subgrantees to fix data quality issues and then inform Minnesota Housing of the “ready” status. Grantees may also act as a liaison between the subgrantee and Institute for Community Alliances (ICA) helpdesk staff if there are data or reporting issues. The reports currently include:

- FHPAP Demographics and Entry Counts
- FHPAP Entry, Exit and Income Report
- Core Report

It is the expectation that HMIS reports are accurate and that grantees will communicate to Minnesota Housing if there are reporting issues.

Narrative Reports

Narrative and outcome reports are submitted to Minnesota Housing annually. Minnesota Housing will provide the report format to grantees in advance of the report deadline.

7.06 Homeless Management Information System (HMIS)

Information for all households served will be inputted into the Homeless Management Information System (HMIS). Data collection forms for FHPAP projects can be found on the [HMIS website](#).

Grantees and subgrantees are encouraged to download these forms on a regular basis to ensure you are using the latest version. Timely data entry is expected in order to comply with quarterly and annual reporting requirements. Grantees are required to review and analyze their program’s HMIS data for accuracy and program evaluation. Refer to Section 7.05, Reporting.

Data Entry Expectations

Entry and Exit

Best practice for HMIS data entry is that households should be entered into HMIS no more than seven days after program entry as well as program exit. Grantees should be mindful of and may develop their own data entry and reporting requirements to ensure there is adequate time to review data prior to submitting the quarterly Expenditure and Outputs Report and Annual Narrative Report.

Activities

Below are **minimum** requirements for when households should be entered into HMIS:

- **Coordinated Entry**

- When a household is assessed and based upon their score, is referred to an FHPAP provider for Prevention or Rapid Re-housing services or direct financial assistance.
- **Street Outreach**
 - When services extend beyond the simple provision of referral resources and is a strategic effort to engage the participant in activities designed to end their homeless situation. For example, if an individual receives assistance completing housing applications or is driven to a homeless shelter, *and/or* service delivery involves multiple contacts or requires a significant amount of time. Grantees have some discretion in determining whether a household should be entered; however, the policy for doing so should be consistent, keeping in mind that proposed numbers served are compared with HMIS outputs only.
- **Prevention**
 - When a household receives FHPAP supportive services or direct financial assistance
- **Rapid Re-housing**
 - All households are required to be entered into HMIS

Entering doubled-up households in HMIS

One variation of the state of Minnesota’s definition of homelessness compared to the Department of Housing and Urban Development’s (HUD) definition, is that households doubled up that are at imminent risk of housing loss are considered homeless by the state of Minnesota. Since HMIS definitions are set up to align with HUD, grantees will enter FHPAP households that are doubled up in the **Prevention** category within HMIS.

Grantees and subgrantees new to HMIS

Agencies new to HMIS or returning after a period of absence must complete documentation to get their agency set up to enter data. In addition, new users must complete new user training before entering data. Visit the following link for more information: [New to HMIS](#)

Chapter 8 – Fair Housing Policy

It is the policy of Minnesota Housing to affirmatively further fair housing in all its programs so that individuals of similar income levels have equal access to Minnesota Housing programs, regardless of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, disability, familial status, gender identity or sexual orientation.

Minnesota Housing's fair housing policy incorporates the requirements of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988, as well as the Minnesota Human Rights Act. Housing providers are expected to comply with the applicable statutes, regulations, and related policy guidance. Housing providers should make sure that admissions, occupancy, marketing and operating procedures comply with non-discrimination requirements.

In part, the Fair Housing Act and the Minnesota Human Rights Act make it unlawful, because of protected class status, to:

- Discriminate in the selection/acceptance of applicants in the rental of housing units;
- Discriminate in terms, conditions or privileges of the rental of a dwelling unit or services or facilities;
- Engage in any conduct relating to the provision of housing that otherwise makes unavailable or denies the rental of a dwelling unit;
- Make, print or publish (or cause to make, print or publish) notices, statements or advertisements that indicate preferences or limitations based on protected class status;
- Represent a dwelling is not available when it is in fact available;
- Deny access to, or membership or participation in, associations or other services, organizations or facilities relating to the business of renting a dwelling or discriminate in the terms or conditions of membership or participation; or
- Engage in harassment or quid pro quo negotiations related to the rental of a dwelling unit.

Minnesota Housing has a commitment to affirmatively further fair housing for individuals with disabilities by promoting the accessibility requirements set out in the Fair Housing Act, which establish design and construction mandates for covered multifamily dwellings and requires housing providers to make reasonable accommodations and to allow persons with disabilities to make reasonable modifications.

Applicants will be required to submit an Affirmative Fair Housing Marketing Plan at the time of application, to update the plan regularly and to use affirmative fair housing marketing practices in soliciting renters, determining eligibility and concluding all transactions.

As a condition of funding through Minnesota Housing, housing providers are not permitted to refuse to lease a unit to, or discriminate against, a prospective resident solely because the prospective resident has a housing choice voucher or other form of tenant-based rental assistance.

Chapter 9 – Fraud, Misuse of Funds, Conflict of Interest, Suspension, and Disclosure and Reporting

9.01 Fraud

Fraud is any intentionally deceptive action or omission made for personal gain or to damage another.

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing and witnesses, discovers evidence of, receives a report from another source, or has other reasonable basis to suspect that fraud or embezzlement has occurred must immediately make a report through one of the communication channels described in Section 9.05.

9.02 Misuse of Funds

A contracting party that receives funding from Minnesota Housing promises to use the funds to engage in certain activities or procure certain goods or services while Minnesota Housing agrees to provide funds to the recipient to pay for those activities, goods or services. Regardless of the Minnesota Housing program or funding source, the recipient must use Minnesota Housing funds as agreed and the recipient must maintain appropriate documentation to prove that funds were used for the intended purpose(s).

A misuse of funds shall be deemed to have occurred when: (1) Minnesota Housing funds are not used as agreed by a recipient; or (2) A recipient cannot provide adequate documentation to establish that Minnesota Housing funds were used in accordance with the terms and conditions of the contract.

Any recipient (including its employees and affiliates) of Minnesota Housing funds that discovers evidence, receives a report from another source, or has other reasonable basis to suspect that a misuse of funds has occurred must immediately make a report through one of the communication channels described in Section 9.05.

9.03 Conflict of Interest

A conflict of interest, actual or potential, occurs when a person has an actual or apparent duty or loyalty to more than one organization and the competing duties or loyalties may result in actions which are adverse to one or both parties. A conflict of interest exists even if no unethical, improper or illegal act results from it.

An individual conflict of interest is any situation in which one's judgment, actions or non-action could be interpreted to be influenced by something that would benefit them directly or through indirect gain to a friend, relative, acquaintance or business or organization with which they are involved.

Organizational conflicts of interest occur when:

- A contracting party is unable or potentially unable to render impartial assistance or advice to Minnesota Housing due to competing duties or loyalties

- A contracting party’s objectivity in carrying out their responsibilities might be otherwise impaired due to competing duties or loyalties
- A contracting party has an unfair competitive advantage through being furnished unauthorized proprietary information or source selection information that is not available to all competitors

Once made aware of a conflict of interest, Minnesota Housing will make a determination before disbursing any further funds or processing an award. Determinations could include:

- Revising the contracting party’s responsibilities to mitigate the conflict
- Allowing the contracting party to create firewalls that mitigate the conflict
- Asking the contracting party to submit an organizational conflict of interest mitigation plan
- Terminating the contracting party’s participation

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing must avoid and immediately disclose to Minnesota Housing any and all actual or potential conflicts of interest through one of the communication channels described in Section 9.05.

A contracting party should review its contract and Request for Proposals (RFP) material, if applicable, for further requirements.

9.04 Suspension

By entering into any contract with Minnesota Housing, a contracting party represents that the contracting party (including its employees or affiliates that will have direct control over the subject of the contract) has not been suspended from doing business with Minnesota Housing. Refer to Minnesota Housing’s website for a list of [suspended individuals and organizations](#).

9.05 Disclosure and Reporting

Minnesota Housing promotes a “speak-up, see something, say something” culture whereby internal staff, external business partners (e.g., grantees, borrowers) and the general public are encouraged to report instances of fraud, misuse of funds, conflicts of interest, or other concerns without fear of retaliation. You may report wrongdoing or other concerns by contacting:

- Minnesota Housing’s Chief Risk Officer at 651.296.7608 or 800.657.3769
- Any member of Minnesota Housing’s [Servant Leadership Team](#) (visit mnhousing.gov and enter **SLT** in the Search box)
- [Report Wrongdoing or Concerns](#) (visit mnhousing.gov and enter **Wrongdoing** in the Search box)

9.06 Electronic Signatures

Minnesota Housing accepts electronic signatures (eSignatures) on certain documents to the extent the person signing complies with all applicable state and federal electronic signature laws, as well as any counterparty requirements. Questions regarding which documents Minnesota Housing permits to be

signed electronically should be directed to Minnesota Housing staff. However, note that Minnesota Housing does not permit eSignatures on any document that needs to be recorded with the county. In addition, a contracting party cannot be required to use electronic signatures.

9.07 Assistance to Employees and Affiliated Parties

A contracting party that receives funding from Minnesota Housing to make specified loans, grants, or other awards to recipients may make these specified loans, grants, or other awards to their directors, officers, agents, consultants, employees and/or their families, elected or appointed officials of the State of Minnesota as well as to Minnesota Housing employees and/or their families (“Affiliated Assistance”) provided:

- The recipient meets all eligibility criteria for the program.
- The assistance does not result in a violation of the contracting party’s internal conflict of interest policy, if applicable.
- The assistance does not result in a conflict of interest as outlined in section 9.03.
- The assistance is awarded utilizing the same costs, terms and conditions as similarly situated unaffiliated recipients, and the recipient receives no special consideration or access compared to similarly situated unaffiliated recipients.
- The assistance is processed, underwritten and/or approved by staff/managers who are independent of the recipient and their immediate family members. Family members include a spouse, domestic partner, parent, sibling, child, in-law or other relative living in the recipient’s home

A contracting party need not disclose Affiliated Assistance to Minnesota Housing. However, the contracting party must document and certify, prior to awarding the Affiliated Assistance, that the Affiliated Assistance meets each of the provisions outlined above. This documentation must be included in the Affiliated Assistance file and must be made available upon request to Minnesota Housing. Affiliated Assistance that does not meet each of these provisions will be considered a violation of Minnesota Housing conflict of interest standards which must be reported through one of the communication channels outlined in section 9.05.

Chapter 10 – Budget Modifications

Budget Modifications That Do Not Require Pre-Approval

Grantees are not required to seek Minnesota Housing approval for the following budget modifications but are required to inform Minnesota Housing staff in writing of these budget modifications within two working days of advisory committee approval, or other approval as outlined in the advisory committee bylaws:

- Moving funds from Administration to Direct Financial Assistance or Supportive Services, provided Supportive Services do not exceed 50% of the total budget unless it is allowed in the Grant Contract Agreement (refer to Chapter 10: Preparing the Application, Section 10.01: Planning)
- Moving funds from Supportive Services to Direct Financial Assistance within the same activity, i.e., Coordinated Entry, Street Outreach, Prevention, and Rapid Rehousing, provided there will not be a reduction in projected households to be served and there is no impact to the program design outlined in the application
- Moving funds from a grantee's budget to a subgrantee's, or moving funds from one subgrantee's budget to another subgrantee's budget, provided that the funds are within the same budget category, for example Rapid Rehousing, and that moving funds will not result in a reduction in projected households to be served and there is no impact to the program design outlined in the application

All other budget modifications require approval from Minnesota Housing. When requesting a budget modification, grantees must submit the following information in writing to Minnesota Housing staff:

- The reason for the request;
- The amount of funds proposed to be shifted;
- The expense categories that funds will be moved to and from
- The subgrantees impacted; and,
- If there will be a change in the total projected households served or an impact to the program design outlined in the application

Budget modification request approvals are at the sole discretion of Minnesota Housing.

Appendix A

FHPAP Biennial Timeline – July 1, 2019 – September 30, 2021

July 1, 2019	FY 19-21 biennium begins
July 22, 2019	Quarterly Coordinator’s teleconference 10-11:30 a.m.
October 2019	Annual Grantee Meeting – Location and exact date TBD
October 28, 2019	Quarterly Coordinator’s teleconference 10-11:30 a.m.
November 8, 2019	Quarter 1 Expenditure and Outputs Report (7/1/19-9/30/19) due
January 27, 2020	Quarterly Coordinator’s teleconference 10-11:30 a.m.
February 14, 2020	Quarter 2 Expenditure and Outputs Report (7/1/19-12/31/19) due
	Six Month HMIS Report (7/1/19-12/31/19) due
April 27, 2020	Quarterly Coordinator’s teleconference 10-11:30 a.m.
May 8, 2020	Quarter 3 Expenditure and Outputs Report (7/1/19-3/31/20) due
July 27, 2020	Quarterly Coordinator’s teleconference 10-11:30 a.m.
August 14, 2020	Quarter 4 Expenditure and Outputs Report (7/1/19-6/30/20) due
	Annual Narrative Report (7/1/19-6/30/20) due
	Annual HMIS Report (7/1/19-6/30/20) due
October 2020	Annual Grantee Meeting - Location and exact date TBD
October 26, 2020	Quarterly Coordinator’s teleconference 10-11:30 a.m.
November 13, 2020	Quarter 5 Expenditure and Outputs Report (7/1/19-9/30/20) due
January 25, 2021	Quarterly Coordinator’s teleconference 10-11:30 a.m.
February 12, 2021	Quarter 6 Expenditure and Outputs Report (7/1/19-12/31/20) due
	18-month HMIS Report (7/1/19-12/31/20)
March 2021	<i>FY 22-23 RFP Published / Information Session (Tentative)</i>
April 26, 2021	Quarterly Coordinator’s teleconference 10-11:30 a.m.

May 14, 2021	Quarter 7 Expenditure and Outputs Report (7/1/19-3/31/21) due
May 2021	<i>FY 22-23 RFP Proposal due (Tentative)</i>
July 26, 2021	Quarterly Coordinator's teleconference 10 – 11:30 a.m.
August 13, 2021	Quarter 8 Expenditure and Outputs Report (7/1/19-6/30/21) due
October 25, 2021	Quarterly Coordinator's teleconference 10 – 11:30 a.m.
November 12, 2021	Quarter 9 Expenditure and Outputs Report (7/1/19-9/30/21) due
	Narrative Report (7/1/19-9/30/21) due
	HMIS Report (7/1/19-9/30/21) due

NOTE: Report dates are subject to change. FHPAP grantees will receive email notification of all report deadlines. Shaded rows indicate expenditure, outputs and HMIS report due dates.