

Regional Program Standards

Focus: WorkSource Centers Youth Program Services
 Other: Economic Opportunity Program

Topic: Keys to Progress – REVISED

Date: April 1, 2021

New Revised

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Overview

The Keys to Progress program is funded by a State of Oregon CARES Act/Emergency Solutions Grant (ESG) to prevent, prepare for, and respond to COVID-19 for individuals and families who are experiencing homelessness to mitigate the impact created by COVID-19. Keys to Progress implements the rapid rehousing service component, which is an evidenced-based practice for quickly engaging an individual or family experiencing homelessness back into permanent housing when long term support and services are not required to sustain the tenancy of the household. Rapid Rehousing is delivered without pre-conditions such as sobriety, income or employment and services are tailored to meet the unique needs of each household.

This project combines Career Coaching (as part of Housing Stability Case Management), Housing Search and Placement, and Rental and Financial Assistance to support individuals and families to permanent housing. The project aims to foster an equity and racial justice response and utilize Housing First approaches to connect households to permanent housing. Keys to Progress is aligned with the housing Coordinated Entry System of the counties it operates in.

For this program, participant data is input in the Housing Management Information System (HMIS) and I-Trac. HMIS is the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards. I-Trac is Worksystems' data management system for tracking and reporting employment and training programs.

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Eligibility and Documentation

To participate in Keys to Progress a participant must:

- Be age 18 years or over and the head of the household.
- Be homeless as defined in the Addendum to these regional program standards. Documentation is required as part of the intake in the HMIS.
- Have not received 24 months of any program’s ESG Rapid Rehousing services in the last three years.

Homeless Status Documentation

Documentation at intake of the evidence relied upon to establish and verify homeless status is required. The order of documentation priority is:

1. Third-party documentation. Records contained in an HMIS, or comparable database used by victim service or legal service
2. Written observation by intake staff of the conditions the individual or family was living in or a written referral by another housing or service provider agency, noted in case notes. Service providers may include emergency shelter providers, case managers, social workers, legal assistance providers, health-care providers, or law enforcement agency.
3. Customer attestation, evidenced by the signed application.

Also, please refer to Additional Documentation Definitions in these regional program standards for more detail.

Grievance Disclosure

Contractors must provide their agency grievance procedure to the participant during the eligibility determination interview meeting. Reasonable efforts should be made to assure that the information and compliant procedures are understood by potential participants. Participants will acknowledge receipt of the disclosure when they sign the Application for services. No copies of the required disclosure form need be maintained in the customer file.

Eligibility Elements

- Review of a document or identification to verify the participant’s name and DOB to validate they are 18 years or older. A copy of the ID is not required to be kept on file.
- Provide a copy of the Contractor grievance procedures.
- Completed and signed Application for services (this document is printed from I-Trac once all participant data is entered and reviewed by staff).

Receipt of ESG Rapid Rehousing Assistance

To determine if or how much Rapid Rehousing Assistance a participant has received over the past three years, Career Coaches must talk to the participant and look in HMIS. Except for Career Coaching – Housing Stability Case Management, the total period for which any program participant may receive Rapid Rehousing services

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with ESG funds may not exceed 24 months during any three-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

Exception: It is important to note that if a participant reached their 24-month maximum assistance between January 21, 2020, and ending February 28, 2021, services may be extended for an additional six months past the 24-month maximum.

Eligibility Reevaluation

Contractors must reevaluate participant eligibility annually or when there is a relevant change in the participant's situation and determine the types and amounts of assistance the participant continues to need. Each reevaluation of eligibility must establish that:

- The participant does not have an annual income that exceeds 30 percent of area median family income for the area.
- The participant lacks sufficient resources and support networks necessary to retain housing without further assistance.

When determining the annual income of an individual or family, contractors must use the Federal standard for calculating annual income by using the Income Evaluation form provided.

Reevaluation Documentation

For each participant who receives rapid re-housing assistance for a period greater than one year, the following documentation of annual income must be maintained:

- Income Evaluation form.
- Source documents that support the income disclosed by the participant for the evaluation reporting period (examples include but are not limited to, wage statements, unemployment compensation statements, public benefits statements, bank account statements).

When a source document(s) is unobtainable, a written statement by the relevant third party (for example, an employer or government benefits administrator), or the written validation by contractor staff of their verbal verification with the relevant third party, of the income the participant received during the period is acceptable.

Where source documents or third-party verification have been sought by contractor staff and determined unobtainable, the written certification by the participant of the amount of income they received for the period and a statement that this income is representative of the income that they reasonably expect to receive over the three-month period following the evaluation may be used. Staff are required to document in case notes the reasonable attempts they made to secure documents or third-party verification.

Ineligible Participants

For anyone determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination. Documentation of the eligibility decision is to be maintained in contractor files.

Program Design and Service Delivery

Service delivery and the subsequent performance will happen during two distinct phases: Intensive Services (Services) and Retention and Advancement Services (Follow-Up).

Intensive Services

In intensive services participants receive career coaching designed to support them in overcoming barriers to employment and to achieve their employment and career goals. Services occur from the point of Keys to Progress eligibility and enrollment until a participant obtains employment that meets their career plan goals and are assessed as ready to transition to Retention and Advancement services. Intensive services will also cease when 90 days has elapsed without a service being provided and documented in I-Trac, and the participant will be automatically moved to Retention and Advancement. The transition date (Exit Date) is always the date of the last service.

Retention and Advancement Services

Retention and Advancement services are designed to assist participants in stabilizing their employment, identify employment advancement opportunities, and/or secure new employment that is in line with their career plan. Retention and Advancement begins at the point of transition from Intensive Services (exit) and the services will continue for a period of one year. Employment information and confirmations are tracked during Retention and Advancement.

Data Entry Requirements

All program information is reported to funders through the Housing Management Information System (HMIS) and I-Trac. To ensure accurate and timely Federal, State and Local reporting, all data is to be entered in the appropriate system within five business days of the activity.

Service Definitions

Career Coaching

Career Coaching is relationship-based guidance and coaching dedicated to increasing the self-sufficiency of participants through unsubsidized employment. It includes assessment of employment-related skills, identification of achievable career and training goals, and development of an achievable career plan (see Career and Resource Plan Development). Career Coaches support participants in execution of the plan and attainment of their goals by building a relationship of support and accountability. Best practices show that participants who maintain periodic communication with a Career Coach are most likely to benefit from services.

Elements of Career Coaching include:

- Assist in identifying career and education goals.
- With the participant, develop a plan that incorporates a customized set of services, including WorkSource services as appropriate, and outside resources that will assist them in meeting their goals.
- Coach participants in the personal and interpersonal (“soft” or “life”) skills required to obtain and retain employment.
- Assist participants in identifying and securing the resources and supports necessary to succeed in their training and career plans.

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- Facilitate collaboration between the different service providers working with the participant to synchronize career and education goals and align resources.
- Coach participants in job search activities, including resume review, interview coaching, and career advising.
- Provide regular check-ins to track participant progress and ensure participants retain employment, including assistance in career advancement planning, resource planning, and re-placement in employment.
- Provide and/or offer connections to employment, childcare and/or housing services which are culturally specific and/or culturally responsive, based on participants' needs.
- Assist participants to access rent assistance resources to support their employment and career plan.

Housing Search and Placement

Housing Search and Placement is an element of Career Coaching. Services are initial services from enrollment to obtaining housing and are provided in conjunction with all Career Coaching services defined above. Activities that assist participants in locating, obtaining and retaining suitable permanent housing.

Housing Search and Placement activities may include:

- Assessment of housing barriers, needs and preferences.
- Development of an action plan for locating housing.
- Housing search.
- Outreach to, and negotiation with, owners or landlords.
- Assistance with submitting rental applications and understanding leases.
- Assistance with obtaining utilities and making moving arrangements.
- Tenant counseling.

Housing Stability Case Management

Housing Stability Case Management is an element of Career Coaching. Services are provided once a participant obtains housing to the point of exit and are provided in conjunction with all Career Coaching services defined above. Assess, arrange, coordinate and monitor the delivery of individualized services to facilitate a participant's housing stability in their permanent housing, or to assist a participant in overcoming immediate barriers to obtaining housing.

Housing Stability Case Management activities may include:

- Using the centralized or coordinated assessment system to evaluate individuals and families applying for or receiving assistance.
- Conducting an initial evaluation, including verifying and documenting eligibility, for individuals and families applying for assistance.
- Counseling the participant through their housing search and move-in to assist them in settling into their new environment.

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- Developing, securing, and coordinating access to Federal, State, and local benefits they may qualify for.
- Providing information and referral to services available that would be helpful to the participant.
- Monitoring and evaluating participant progress.
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Conducting Eligibility Reevaluations.

Career Mapping Workshop

This workshop is the first step of the career mapping process. Participants identify their strengths, gifts, capacities, and qualities that will enable them to be successful in the work environment and potential jobs. After the workshop, the Career Coach meets individually with participants to create a Career Plan that articulates these goals, identifies resources and outlines next steps. Refer to the Career Mapping Manual for additional information and detail.

Career and Resource Plan Development

The Career and Resource Plan is to be completed within the first 90 days of program participation and is developed with each participant using the Career Mapping process. The Plan documents career interests, strengths and challenges, short- and long-term education and employment goals and the steps and supports needed to meet these goals.

Prior to Plan development, appropriate assessments should be conducted to provide critical information about the participant's career goals, interests, aptitudes, basic academic skill level, occupational skills, work history, work and college readiness, attributes, personal strengths, developmental needs, and support service needs. The analysis and application of this assessment information is critical to guiding and coaching the participant and assisting them to develop a realistic Plan to reach their career goals. During Intensive Services, the Plan should be reviewed and updated at least every 120 days as the participant completes (or is unable to complete) activities as planned and should drive program participation.

Additionally, assisting the participant in creating a Prosperity Planner budget is an element of the Career Plan. This will help inform them on the type of salary they need to become self-sufficient, as well as provide the budget back-up for any support services necessary to assist them through their service and training activities.

The Plan is a dynamic document that will change as the participant is provided opportunities to explore optional careers of interest, through meetings in which the participant receives advice and guidance and through a variety of work and community-based experiences exploring a range of occupational areas. The plan should be developed as a professional collaboration between the participant and Career Coach.

Career Track Employment

A job or position within an occupation that is part of an articulated career path that provides ongoing opportunities to advance skills and increase earnings over time, such that a participant can earn a living wage that meets their self-sufficiency standard goal.

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Job Search Assistance

Coaching to or teaching strategies which can be used to increase job search effectiveness. Assistance may include a variety of strategies for conducting on-line job searches, networking, and the role of resumes, cover letters, and interviews in a successful job search. Service can be provided one-on-one or in a group setting.

Support Services

Overview

Support services are used to help participants regain stability in permanent housing, and support engagement in training and job search. There are two categories of support services, those that can be paid for with the Keys to Progress grant funds and those that can be paid for with other contracted funds which are defined below and referred to as Additional Support Services.

Prior to considering support service payments, efforts must be made to identify resources in the community or from other grant resources that may provide the same support and use those available resources first. Processes must be in place for appropriate referrals to such services as food stamps and community-based social services. Staff is responsible for assisting participant exploration of resources from community sources and/or within the participant's personal support system.

Administrative Requirements

Documentation

All support services are to be tracked in the participant's I-Trac record on the Payments Tab in the support services control. When a Support Service is paid directly to the participant a signature that acknowledges receipt of the support payment must be on file with the back-up payment documentation noted below in Support Service Definitions – direct deposit into an account in the participant's name and the endorsement on a cancelled check are allowable documentation of this requirement. Direct Deposit information must be received directly from the participant with approval to deposit support service payments to the account.

When a gift card (including a gas card) is provided as the support payment, receipts for the total amount of the gift card that reflect the purchase of allowable and approved items is required with the fiscal documentation file.

A support service payment does not extend participation. Keys to Progress grant-funded support services are available during both Intensive and Retention and Advancement phases.

Administrative

Each contractor must establish a written process to ensure proper fiscal procedures are followed, including paying from original invoices, securing original receipts, and a participant-signed acknowledgment of direct payments made to reimburse participants.

Documentation of Support Service payments is maintained in the financial records attached to the payment record. A copy of the customer's Prosperity Planner enrollment budget documenting the participant's financial need must be saved in I-Trac.

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Each contractor must establish and follow a process for reconciling pre-purchased support services (i.e., bus passes, etc.). This reconciliation must occur at least quarterly (monthly preferred), with the documentation maintained on-site and made available during Worksystems or funder monitoring, as requested.

Note: Support Service purchases administered with pre-purchased (gift) cards must be allowable under the Federal Cost Principles (unless specifically allowed for by a specific grant, which allowability will be outlined in the Regional Program Standards for the grant).

Support service payments/reimbursement must be made from funds during the program year in which they were incurred.

Definitions – Keys to Progress Support Services

The following support services may be provided with Keys to Progress funding.

Bus Tickets or Passes – Housing Related

Bus tickets/pass for travel related to obtaining and retaining housing.

Required Documentation: A log must be kept of bus passes and bus ticket packages (not individual ticket) distribution to participants that includes the participant's signature acknowledging receipt. A signed receipt for each bus ticket package or pass received can replace a log and must be maintained in the participant file.

Credit Repair

Credit counseling and other services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Required Documentation: Itemized invoice that clearly details the services provided and the published rate for the service. Payment must be made to the vendor.

Housing Mediation

Necessary mediation between the participant and the property owner or the people with whom the participant is living to prevent the participant from losing their permanent housing where they currently reside.

Required Documentation: Itemized invoice that clearly details the services provided and the published rate for the service. Payment must be made to the vendor.

Legal Services – Housing Related

Hourly fees for legal advice and representation regarding matters that interfere with the participant's ability to obtain and retain housing, including landlord/tenant issues. The services must be necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which they currently reside.

Ineligible Legal Fees: Legal fees associated with citizenship matters, issues related to mortgages, retainer fee arrangements and contingency fee arraignments are ineligible.

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Required Documentation: Itemized invoice that clearly details the services provided and the published rate for the service. Payment must be made to the vendor.

Definitions – Additional Support Services

The following support services may be provided with other available contract funding.

Auto or Bicycle Repair

Funds may pay for repair and replacement of essential parts and safety equipment to an automobile or bicycle only if it can be verified there is no other reasonable way for the participant to transport himself/ herself to a training or work site. For Auto Repair, the vehicle must be titled and registered in the participant's name, be properly insured and there must be written verification by a reputable certified mechanic that the repairs are needed.

Required Documentation: Original invoices/receipts are required for car and bike repair payments. Quotes or work orders will not be accepted for payment receipts. Auto Repair payment must be made to the invoicing certified mechanic and a copy of the auto registration, documentation of a valid driver's license, and proof of insurance card must be included with the payment record and verified to be the same vehicle on which repairs were made.

Auto Insurance

Support Service payment may be provided for auto insurance coverage required by the State of Oregon or Washington and can only be justified in a situation where, without the insurance, the participant would not be able to travel to the training site and/or place of employment. The vehicle must be titled and registered in the participant's name and the participant must have a valid driver's license in their state of residence.

Required Documentation: The original insurance billing with payment directly to the insurance company is required. In addition, documentation of a valid driver's license, a copy of the auto registration, and proof of insurance card is to be included with the payment record.

Auto Registration

Costs associated with DEQ test fees, title transfer and/or registration or renewal may be paid to allow participants to register their auto for the purposes of completing training or securing and/or maintaining employment. Note that the Oregon Department of Motor Vehicles may require a valid driver's license and proof of auto insurance attached to the vehicle.

Required Documentation: The original registration/transfer/test receipt(s) and a photocopy of the new title and/or registration in participant's name must be collected and maintained in the Support Service financial file.

Books and Fees

Costs associated with required books, school supplies and fees for participants enrolled and officially registered in post-secondary education or training, including testing fees, or books and fees required for occupational skill training.

Required Documentation: The original store receipt, school record or test receipt (for fees) that reflects an itemization of the purchased items.

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Child and Dependent Care

Childcare costs are for a child(ren) under age 11 during the time the participant is engaged in program services — including travel to and from the service delivery site. Due to the high cost and limited resources this support should only be considered on a case-by-case basis.

A spouse, sibling, or other family member residing within the same household may not be paid with Support Service funds to provide childcare for the participant’s children. Costs for care of an individual over age 11 may only be paid if there is a documented disability stating the individual may not be left alone.

Required Documentation: A care log (completed by the participant and signed by the care provider verifying dates, times and cost) is to be used to track the costs being reimbursed. The log must be retained in the financial documentation for the payment.

Clothing/Personal Care

Clothing and/or related footwear or incidentals for interview (including grooming and hygiene products), work or training. This may include such items as a uniform/safety attire, or a type of work shoe or protective eye wear required for the job by an employer (and not provided by the employer) or required of trainees by the training provider. Utilize community resources for interview attire whenever possible.

Required Documentation: The original store or merchant receipt that reflects an itemization of the purchased items.

Employment Documentation

Payment of fees required to secure or replace documentation required to complete an I-9 with an employer to secure employment.

Required Documentation: Receipts that itemize the fees necessary to obtain the approved document with staff attestation (notation and signature on receipt copy is sufficient) that the identification documentation was secured.

Housing and Rent Assistance

Where housing assistance through the appropriate Housing Hub is not readily available, contractors may use the other available contract funding to provide the following types of housing assistance.

Housing Assistance

Payments for services or items necessary to move into stable housing. Examples include but may not be limited to: Application and move-in fees, security deposits, motel vouchers for temporary housing, fees for access to Community Warehouse, household items, U-Haul or similar truck or van rental to move furniture. Whenever possible, community resources such as Goodwill and Community Warehouse should be utilized.

Required Documentation: Direct payment from an invoice to landlord/rental company or itemized receipt from the store or merchant where the purchase was made.

Housing Stability Education

Grant funds may be used to pay the costs associated with community housing stability education services that will contribute to the participants’ work readiness through stabilized housing.

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Required Documentation: An invoice from the community service provider is required with documentation of the participants' attendance.

Rent Assistance

Grant funds may be used to assist with rent payments (current and arrears, including rent for mobile home space) that will contribute to the participants' work readiness. WIOA funds may not be used to pay interest charges or late fees associated with past-due rent expense.

To be considered for a support service payment, staff must determine that the situation would impede the participant's ability to conduct an efficient job search, maintain employment or participate in training without the rent assistance, and that the participant has a plan for future payments.

Where community rent assistance resources are available and the participant eligible, those resources must be used before support service payments can be utilized. Documentation that the participant is not eligible for community resources must be included with the support service payment record.

Mortgage or other payments that contribute to the purchase of real property that the participant owns are not allowed (e.g., house, condominium, car, boat, etc.).

Required Documentation: Clear verification (copy of rental agreement, voucher or detailed receipt) of charges due and participant residency is required; the address on the lease must match the participant I-Trac record if the participant is not named on the lease agreement. Payment must be made to the leaseholder/owner.

Laptop Computer

Purchase of a basic laptop computer when needed to participate in program services, engage in training or secure and/or maintain employment (when not provided by the employer or training provider). Up to \$500 may be used for the purchase; exceptions to this limit may be considered when circumstances support. Contractor manager approval is required for exceptions.

Required Documentation: The original store or merchant receipt that reflects an itemization of the purchased items.

Legal Services

When necessary to assist a participant in expunging a criminal record or to maintain legal to work documentation to secure employment or participate in a training. Documentation that community resources (Legal Aid, etc.) were reviewed and considered before approving support service payment is required.

Required Documentation: Itemized invoice that clearly details the services provided and the published rate for the service. Payment must be made to the vendor.

Medical/Dental/Optical

This includes medical/dental/optical testing/treatment, prescriptions, mental health testing, counseling. Funds may only be used for co-payments and expenses of the participant and cannot be used for costs of family members. Due to the high cost and limited resources, efforts should be made to first utilize Oregon Health Plan,

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County health care resources, and/or sliding scale fee structures with providers. Note: WIOA funds cannot be used for drug-use testing.

This service should be limited to the minimum required to permit the person to participate in training, job search, accept employment, or maintain employment. All reasonable alternatives should be researched by the participant, including lower cost providers, such as Oregon Health Plan, County Health Department, Care Oregon, etc.

Required Documentation: Co-payments may be reimbursed to the participant and require a receipt from the health care/service provider showing date and amount of payment. All other payments must be made directly to the health care/service provider based on an original detailed invoice (no statements)

Parking

When necessary, to enable the participant to engage in career services or training activities (e.g. college campus parking fees).

Required Documentation: Original receipts that reflect a location and time in line with approved service provision (i.e., a class schedule).

Professional Test/License/Organization Fees

When membership, professional event registration and/or licenses/certifications/test/test preparation fees are required or necessary to ensure a participant is prepared for employment or provides increased access to employment opportunities in the associated sector. Support may include the cost for professional licenses (including a state-issued driver's license when required for the job); certifications; test fees and/or test preparation materials, including GED; business, technical and professional organization fees; professional event registration fees, etc.

Required Documentation: Original receipt(s).

Tools

When participants are required to purchase their own tools for employment or training, this cost may be covered by support service payments. Examples include mechanic, shop, electrician tools, etc.

Tools or equipment that is supplied by the employer, e.g., desk computers, industrial equipment, stationary, machinery, safety equipment, etc., may not be paid with support services.

Required Documentation: Original itemized receipts that reflect the allowable and agreed upon item(s). In addition, for tool purchases for training, documentation from the training provider of the required items is to be maintained in the file. For employment, a bona fide, written job offer that shows the requirement of employees providing their own tools or equipment (must be specific) must be provided prior to the approval of funds.

Transportation

Includes all modes of transportation (e.g., public transportation passes or tickets, gas for a personal vehicle, car share service, Uber/Lyft/taxi service, bicycle/scooter share service) to help participants engage in services and activities that support training and education, job search and/or employment

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Staff are required to determine that assistance provided is not duplicated, such as a bus pass for a month and gas purchase during the same month. Additionally, funds should not pay for the monthly cost of share vehicle services, but can reimburse for the month(s) that the participant uses the service for allowable activities. This should be managed through verification of attendance logs and communication with the participant documented in file.

Required Documentation: A log must be kept that tracks activities supported with transportation assistance. A signature on the log for bus passes, bus ticket packages (not individual tickets), and gas card distribution to participants that includes the participant's signature acknowledging receipt can be used as documentation. For other types of transportation, a detailed receipt showing date and time must support reimbursement payment and must align with activities noted in the log. A signed receipt for each instance of transportation support payment in the file can replace a log if the tie to services is noted. Receipts are required for gas cards and must show allowable and approved purchase (i.e., gasoline and not items from the mini mart).

Utilities

Utility assistance may be provided to assist a participant in stabilizing their living situation and to conduct an efficient job search, maintain employment or participate in training. This includes past due utility payments, utility deposits, internet and cell phone bills (but does not include any sort of television/cable expenses). Prepaid cell phone service may be paid for with Support Services funding. Up to \$75 total may be spent on a phone set-up and then minute purchases may be made in line with program engagement.

The original bill must be provided before payment can be approved, with verification that the utilities/phone are for the participant's personal residence or in the participant's name (in the case of cell phones). WIOA funds may not be used to pay interest charges or late fees associated with past due utility expense.

Required Documentation: Clear verification (copy of detailed utility invoice that matches participants address in I-Trac) of charges due. Payment must be made to the vendor.

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Leveraged Services

Entrepreneurial Training

Training that provides the basics of starting and operating a small business. These trainings develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:

- Creatively seek out and identify business opportunities.
- Develop business budgets and forecast resource needs.
- Understand various options for acquiring capital and the trade-offs associated with each option.
- Communicate effectively and market oneself and one's ideas.

WorkSource Services

Keys to Progress participants who are eligible for Workforce Innovation and Opportunity Act (WIOA) services and are enrolled in a WIOA program may be eligible for WorkSource Work Experience services, WorkSource Training services, and the National Career Readiness certification.

Please refer to the WorkSource Portland Metro Regional Program Standards for additional details and eligibility requirements.

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Performance

Keys to Progress performance measures apply to all participants. Employment related performance does not apply to participants exited under the Global Exclusion (see below). All performance is managed, tracked and reported to Keys to Progress funders through HMIS or I-Trac.

Measure	Calculation Methodology
Exit to Permanent Housing	<p>Denominator: All exited participants. <i>Global Exclusion Exit reasons do not exclude a participant from the denominator.</i></p> <p>Numerator: The participants who reside in permanent housing at the time of exit.</p>
Placed in Unsubsidized Employment	<p>Denominator: All exited participants that were not employed at registration.</p> <p>Numerator: The participants employed by the end of Q4 following the exit date.</p>
Placed in Career Track Employment	<p>Denominator: All exited participants.</p> <p>Numerator: The participants that are employed in a position that aligns with the Career Track employment goal identified in their Career Plan by the end of Q4 following the exit date.</p>
Employment Retention	<p>Denominator: All participants that exit Employed.</p> <p>Numerator: The participants that are employed in any two quarters of the four quarters following the exit date</p>
Advancement in Employment	<p>Denominator: All participants that were employed at enrollment or who are in the Unsubsidized or Career Track Employment numerator.</p> <p>Numerator: The participants that have at least one advancement (defined below) in employment by the end of Q4 following the exit date.</p> <p>Advancement Definition: An increase in wage, hours worked, or availability of benefits. The base from which advancement is calculated is the employment elements at enrollment or employment elements with the job secured during program engagement. It is not considered an advancement when benefits begin, if a position is offered and accepted that includes a benefit package but the benefits do not become effective immediately (i.e., probationary period completed, 30-day grace period, etc.).</p>

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Additional Performance Guidance

Employment performance data is tracked and reported through I-Trac. Where required of the performance measure element, participant files are to contain the supporting documentation.

Contractors should establish a process to regularly review I-Trac reports for data quality. Ensure that participants' engagement in services and credential and/or employment attainment is being entered within the required timeframes and with appropriate confirmations (where required).

Additional guidance to consider when managing data for employment performance follows.

Exit

The Keys to Progress Exit date is the last date of rental subsidy or when a participant receives a total of 24 months of ESG services. Exit is manually entered in I-Trac, employment information is entered, and confirmation completed. If a participant needs continued services within 3 months of Exit date the Exit date is deleted, and services are entered on the Services Tab to continue Intensive Phase services. After Exit, only Follow-Up services can be provided.

Auto-Exit

When a participant has gone more than 90 days without a Keys to Progress Intensive Phase service they will be automatically exited. The Exit date is the date of the last Keys to Progress Intensive Phase service entered in I-Trac. After an Auto-Exit, only Follow-Up services can be provided.

Full Program Exit

At the end of one year of Follow-Up services, a participant is automatically fully exited from the program. This means they are no longer eligible to receive services funded by Keys to Progress without completing eligibility and re-enrolling in a new enrollment episode.

Exit to Permanent Housing Status

Permanent Housing includes the unit is owned or rented by the participant (with or without subsidy); the participant is staying or living with family in permanent tenure; or the participant is staying or living with friends/roommates in permanent tenure.

Placed in Unsubsidized or Career Track Employment

Contractor staff is responsible for collecting confirmation of employment details and entering the information into I-Trac. Communication from the participant of the confirmation details is acceptable; no additional documentation is required. Contractor staff are responsible for accurate accounting of earnings, hours and benefits information that inform this measure. When participants auto-exit and contractor staff learn they became employed, staff should attempt to contact the participant and obtain the employment details.

Employment Retention

Continued employment can be determined based on follow-up conversations with participants; it is the contractors' responsibility to accurately follow and account for employment retention by maintaining ongoing contact with participants during the follow-up year.

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Advancement in Employment

Participants that report a gain in wage, hours worked per week or employer-offered benefits are counted in the advancement in employment performance measure. Advancement detail may be based on follow-up conversations with participants; it is the contractors' responsibility to accurately account for the details that inform this measure.

Note: The benefit start date is not considered an advancement if a position is offered and accepted that includes a benefit package, but the benefits do not become effective immediately (i.e., probationary period completed, 30-day grace period, etc.).

Global Exclusions for Performance

Participants who find themselves in certain types of circumstances beyond their control and that preclude them from continuing participation may be manually exited from the program. *If this type of exit is recorded the participant will not be included in any of the employment performance measures.*

To exit a participant for any of these global exclusion reasons requires file documentation supporting the exit reason recorded.

Reserve Forces-Called to Active Duty

A case note is required that includes the name and title of the military representative that verified the call, or a copy of the military orders must be in the file.

Deceased

A copy of the death certificate or a copy the obituary or newspaper article must be in the file.

Health/Medical

A case note that includes the name and contact information of the family member or agency staff person providing the exclusion information (do not put specific medical diagnoses or specific medical information into either the file or the I-Trac record).

Incarcerated/Institutionalized

A copy of public information verifying the incarceration, or a case note that includes the name and contact information for the family member or agency staff person providing the exclusion information.

Terminating Assistance

If a participant violates established program requirements, the contractor may terminate the Keys to Program enrollment and related financial assistance. Contractors must establish a formal process that recognizes the rights of individuals affected, exercises judgment and examines all extenuating circumstances in determining when violations warrant termination, so that a participant's assistance is terminated only in the most severe cases.

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must include all the following elements:

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- Written notice to the participant containing a clear statement of the reasons for termination.
- A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.
- Prompt written notice of the final decision to the program participant.
- Notification that termination does not bar the participant from engaging in further assistance later for which they are eligible.

Documentation Requirements

The following are documentation requirements for Keys to Progress participant files.

Requirement	Detail	Location
Participant Information Enrollment Agreement	A completed and signed Application is required. The application is developed from the participant registration data entered in I-Trac. Print the Application from the Customer Documents link once all Registration data is entered.	I-Trac (Customer Documents) Signed application / participant file
Eligibility Elements	Required documentation of program eligibility elements. The signed application serves as documentation of all participant eligibility attestation where a separate document is not required.	Signed application / participant file
Intake Form	Includes all required assessment, demographic and characteristic information, eligibility detail for rent assistance, and a participant attestation statement that all information contained on the form is true accurate to the best of the participant's knowledge.	HMIS
Homeless Status	Verify that participant is homeless as defined by the funding source.	Staff Attestation HMIS I-Trac
Release of Information	<u>For Multnomah County:</u> Secure signatures of all adults in the household on the Release of Information printed out of HMIS. <u>For Washington County:</u> Secure signatures of all adults in the household on the Release of Information printed out of HMIS (Road Home release).	HMIS Participant File
Housing and Service Need Evaluation and Housing Stability Plan	A Housing and Service Need Evaluation and Housing Stability Plan is required for participants that receive housing placement assistance.	Participant File
Career Plan	Original plan and updates, which must include a plan as to how the participant will retain permanent housing after the Keys to Progress assistance ends.	Participant file

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Requirement	Detail	Location
Case Notes	<p>Notes relative to participant’s progress in their plan. Case notes are either a service or a narrative case note tracked in I-Trac or a service in I-Trac and narrative case note in an agency’s case noting system.</p> <p>Narrative case notes should not include any medical or treatment information, or personal information that is not relevant to their career plan activities</p>	Staff Attestation I-Trac / Agency Narrative Case Note System
Required Disclosure	At the time of registration, the participant is to be provided with the Contractor’s Grievance disclosure.	Signed Application / physical file

Multnomah County Rent Assistance

Keys to Progress rent assistance is available to residents of Multnomah County only, and is intended to provide tenant-based rental assistance for participants to become housed and allow them to actively engage in workforce development services. Rent Assistance is provided through the rent assistance coordinator contractor and is available to eligible participants enrolled in career coaching programs such as Keys to Progress.

The rent assistance coordinator is responsible for developing a process to document the total months' of ESG assistance a participant received within the last three years prior to starting Keys to Progress ESG rent assistance. Additionally, the rent assistance coordinator may enroll participants in the Keys to Progress program for the rent assistance services only. Those participants must meet the eligibility, enrollment and documentation requirements outlined within these regional program standards.

Housing Unit Requirements

Rent reasonableness

A determination is to be made to assure that the rent being paid to an owner is not more than rent charged for comparable units in the private, unassisted market and for comparable unassisted units in the premises.

Rent Payment Calculation

The calculation of the monthly rent assistance payment must include:

- The total monthly rent for the unit.
- Any fees required for occupancy under the lease (other than late fees and pet fees).
- Utilities if the participant pays separately for utilities. The monthly allowance for utilities (excluding telephone) is established by the public housing authority for the area in which the housing is located.

Ineligible Rent Payments

Except for a one-time payment of rental arrears on the participant's portion of the rental payment, rental assistance cannot be provided to a participant who is:

- Receiving tenant-based rental assistance.
- Living in a housing unit receiving project-based rental assistance or operating assistance funded through other public sources.

Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Act (URA) during the period covered by the URA payments.

Duplication of benefits occurs when a household receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. The contractor must establish and follow procedures to ensure that duplication of benefits does not occur.

Housing Habitability Inspection

All housing units must meet the minimum ESG-CV Habitability Standards. Providers must use the Keys to Progress Housing Habitability Inspection Checklist to document this inspection. This inspection may be conducted virtually if necessary (e.g., video streaming walkthrough, date-stamped photos of unit).

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For participants determined eligible under the Additional Criteria section in the Homeless Definition in the Addendum of these regional program standards (see page 28), the requirement of meeting the ESG-CV Habitability Standards is waived so long as one of the following applies:

- The provider maintains documentation showing that a prior rental assistance provider determined the housing unit meets the ESG-CV Habitability Standards or ESG-CV Housing Quality Standards. If the prior rental assistance provider completed a Housing Quality Standards checklist, then an additional fire safety checklist must be completed by the rent assistance coordinator.
- The provider provides no more than 90 days of rapid rehousing assistance to the participant.
- The provider conducts an inspection within the first 90 days and determines the housing meets the HUD Habitability Standards.

Lead based paint

A visual assessment for lead-based paint must be completed for all housing units that meet all three of these conditions:

- The household living in the unit is being assisted with Keys to Progress financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six years is or will be living in the unit.

The lead-based paint assessment requirements apply regardless of whether the participant is remaining in an existing unit or moving to a new unit.

The visual assessment must be completed prior to rent assistance being provided, and annually thereafter.

For properties constructed prior to 1978, the rent assistance coordinator contractor must provide the participant with:

- HUD’s disclosure form for rental properties disclosing the presence of known and unknown lead-based paint; and
- A copy of the “Protect Your Family from Lead in the Home” pamphlet.

Violence Against Women Act Housing Protections

If a participant falls under the eligibility criteria of fleeing or attempting to flee domestic violence (see page 27 in these regional program standards), the following requirements apply:

- The Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation form is to be reviewed with the participant. The participant is not required to sign the form and is still eligible to receive rent assistance.
- The Notice of Occupancy Rights under the Violence Against Women Act is to be given to the landlord.

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- The Violence Against Women Act Lease Addendum is to be provided to the landlord and participant for signature. If the landlord refuses to sign, the rent assistance coordinator is to document that an attempt to obtain signature was made.

Rental Assistance Agreements and Lease Agreements

When providing rent assistance, the rent assistance coordinator must ensure that a Rental Assistance Agreement is in place between the rent assistance coordinator and the landlord, and a Lease Agreement is in place between the participant and the landlord. The rent assistance coordinator must make payments directly to the landlord (or their agent, such as a property manager).

The rent assistance coordinator must establish standards for determining what percentage or amount of rent and utilities costs each participant must pay while receiving rapid re-housing assistance. The rent assistance coordinator must also establish standards for determining how long a participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

When paying for rent assistance through a lease agreement, each participant must have a legally binding, written lease for the rental unit, unless the rental assistance is provided solely for rental arrears.

Allowable Rent Assistance Expenses

There are two categories of assistance available: Financial Assistance and Rent Assistance.

Financial Assistance

Payments for services or items necessary to move into stable housing.

Application Fee

The rental housing Application Fee that is required by the landlord to all applicants.

Security Deposit

A security deposit required by the landlord that is equal to no more than 2 months' rent.

Moving Costs

Costs necessary to move into a rental unit such as truck rental or hiring a moving company; and payment of temporary storage fees for up to 3 months. To cover storage fees, the fees must be accrued after the date the participant was determined eligible and enrolled in the Keys to Progress program and before the participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Last Month's Rent

If required to secure rental housing, the last month's rent may be paid at the time the security deposit and the first month's rent is paid. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

Emergency Transfer Costs

If an emergency transfer plan is being implemented, ESG-CV funds may be used to break a lease to implement the emergency transfer plan. These costs are not subject to the 24-month limit on rental assistance.

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Utility Deposits

Standard deposit required by the utility company for gas, electricity, water or sewer.

Utility Payments

Up to 24 months of utility payments (gas, electricity, water and/or sewer) per participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. Assistance is limited to not more than 24 months of utility assistance within any 3-year period.

Required Documentation: Direct payment from an invoice to landlord/rental company, itemized receipt from the merchant where the purchase was made, or original utility invoice where the service address matches the rental unit, and the responsible party is the participant or a member of the participant's household.

Rental Assistance

Rent Payments

Tenant-based rent assistance is available for up to 12 months, and may be paid for a housing unit in which the participant currently lives or may continue to be paid if the participant moves to another unit or building, if the participant continues to meet the program requirements.

Rent Arrears Payments

Rent arrears may be made with a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears. Arrears may not be paid for rent due prior to April 2020.

Required Documentation: Clear verification (copy of rental agreement, voucher or detailed receipt) of charges due and participant residency is required; the address on the lease must match the participant I-Trac record if the participant is not named on the lease agreement. Payment must be made to the leaseholder/owner.

Landlord Incentives

When necessary and negotiated by the rent assistance coordinator, eligible landlord incentive costs may be paid, including:

- Signing bonuses of up to 2 months of rent
- Security deposits of up to 3 months of rent
- Costs to repair damages incurred by the participant that are not covered by the security deposit or that are incurred while the participant is still residing in the unit
- Costs of extra cleaning or maintenance of a participant's unit or appliances

Landlord incentives cannot exceed 3 times the rent charged for the unit.

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Rent Assistance Performance

Success Measure	Detail/Methodology
Individuals Housed with Rapid Re-Housing	Denominator: All exited participants. Numerator: Number of participants that become housed.
Housing Retention for 6 months	Denominator: All exited participants Numerator: Number of participants that retain housing 6 months after rent assistance ends.
Housing Retention for 12 months	Denominator: All exited participants Numerator: Number of participants that retain housing 12 months after rent assistance ends.

Performance Management Guidance

Rent Assistance Coordination staff is responsible for entering referral, payment, rent assistance housing status change date information, housing retention follow-up information and other required data in I-Trac and ServicePoint once a participant is referred to and begins receiving rent assistance.

Data Entry and Documentation Requirements

All required data is to be entered into the Service Point and I-Trac MIS. This data entry constitutes staff attestation of the required information.

The following are file documentation requirements for participants receiving rent assistance funding. Documentation may be paper located in a physical file (to be always kept in a secure [locked] file location); may be kept in a secure electronic file (secure means limited access/access requiring system permissions and is not in a folder accessible by all staff and with no security built in).

A Rent Assistance log is required which includes detailed payment information: Service Point and I-Trac Customer ID of client, name of Landlord, date of check, amount of rent paid, and month for which rent was paid.

Rent Assistance data entry and participant file maintenance is the responsibility of the rent assistance coordinator.

Requirement	Detail	Location
Statement of Understanding	The statement of understanding is to be signed by the participant to acknowledge the number of months the rent assistance coordinator communicated that rent assistance will be provided given that the participant remains eligible. Any amendments to the plan are to be added to the file; email communication of amendments is acceptable file documentation.	Participant File
30-day End of Assistance Letter	Copy of letter sent to landlord and participant, along with any amendments.	Participant File
Housing Habitability Inspection Reports	Housing Habitability Inspection Checklist.	Participant File

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Requirement	Detail	Location
Lead Based Paint Inspection, Remediation and Disclosure	Documentation of compliance with the lead-based paint inspection, remediation and disclosures.	Participant File
Documentation of Rent Reasonableness	Documentation of rent reasonableness, including the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.	Participant File
Domestic Violence	<ul style="list-style-type: none"> • Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation form. • Violence Against Women Act Lease Addendum. 	Participant File
Rental Assistance Agreement	Copies of rental assistance agreements.	Participant File
Lease Agreement	The Agreement must show that the participant is living in the unit legally and with knowledge of the landlord/property owner.	Participant File
Termination of Assistance	Documentation of compliance with the agency's termination of assistance process for cases when a participant violates established program requirements.	Participant File

Addendum

Homeless Definitions

Individuals who meet one of these three categories of homeless, further defined below:

- Lacks a fixed, regular, adequate nighttime residence.
- Fleeing or attempting to flee domestic or other violence.
- Qualified as homeless before moving into their current housing.

Adequate Nighttime Residence

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning one of the following:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Fleeing Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence.
- Has no other residence.
- Lacks the resources or support networks (for example family, friends, faith-based or other social networks) to obtain other permanent housing and lives in an emergency shelter or with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
- If someone meets this definition of homeless, they must also be referred to a local Victim Service Provider.

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Additional Criteria

Individuals and families who meet all the following criteria:

- Qualified as “homeless” as defined above immediately before moving into their current housing.
- Have been residing in housing with time-limited rental assistance provided under a homeless assistance program other than an ESG program.
- Would not have any overlap in rental assistance between the non-ESG program and the ESG program, due to exhaustion or expiration of the non-ESG assistance or program funds.
- Would not have a gap of more than one month (or equivalent number of days) between the end of the non-ESG rental assistance and the beginning of their ESG rental assistance.
- Do not have the resources or support networks (beyond an eviction moratorium) (for example, family, friends or other social networks) needed to retain their existing housing without ESG assistance.

Additional Homeless Status Documentation Definitions

- Records contained in a participant’s HMIS or other comparable, partner agency database used by victim service or legal service providers are an acceptable evidence of third-party documentation and intake worker observation.
- If the participant qualifies as homeless under the Adequate Nighttime Residence homeless definitions above, acceptable documentation includes a written observation by an outreach worker of the conditions where the participant was living, a written referral by another housing or service provider or an attestation by the participant.
- If the participant qualifies under the Fleeing Violence definition, then acceptable evidence includes:
 - An attestation statement from the participant that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks.
 - Where the safety of the individual or family would not be jeopardized, the fleeing violence situation is to be confirmed by a narrative case note from the intake worker or a written referral by a housing or service provider, outreach worker, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the participant sought assistance. The written referral or observation need only include the minimum amount of information necessary to document that the participant is fleeing, or attempting to flee violence.
- If the participant qualifies as homeless under Additional Criteria of the homeless definition above, because they resided in an emergency shelter or place not meant for human habitation or are exiting an institution where they resided for 90 days or less, acceptable documentation includes the records defined in No. 1 above and one of the following:
 - Discharge paperwork or a written or oral referral from a social worker, case manager or other appropriate official of the institution stating the beginning and end dates of the time the participant was residing in the institution. All verbal statements must be documented by the intake worker.
 - Where this documentation is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the discharge paperwork described above and an attestation by the participant that states they are exiting or have just exited an institution where they resided for 90 days or less.

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All projects must meet all applicable HUD ESG requirements in 24 CFR §576 and HUD Waivers and Alternative Requirements for the Emergency Solutions Grants Program Under the CARES Act, including HUD Notice CPD-20-08 and HUD Notice CPD 21-05.