

*Released*  
July  
2016

# Guide for Homeless Services Grantees

Homeless Women – Crisis Shelter Home Program  
Service Linked Housing Program  
Emergency and Transitional Housing and Services Program  
Housing Counselor and Aftercare Program  
Homelessness Prevention Program



Maryland Department of Human Resources  
Family Investment Administration  
Bureau of Homeless Services



## **LETTER FROM THE FAMILY INVESTMENT ADMINISTRATION EXECUTIVE DIRECTOR**

Dear Providers,

Thank you for working diligently to serve the homeless across Maryland. Your work is not easy work and it requires a great deal of creative thinking, patience, perseverance and dedication. We hope this guide will be an easy tool that will allow you to maximize the funding available for this work in the most effective and efficient manner.

During FY 2016, you provided more than 650,000 bed nights to the homeless throughout the state.

The staff within the Bureau of Homeless Services (BHS) is working on significant improvements to the way our grants are managed and to the support our agency offers to providers. Included within this guide you will see the expectations associated with our grants, broken down in a clear and concise way.

I am very optimistic about what the upcoming year holds along with the important work of the state Interagency Council on Homelessness (ICH). We look forward to working very closely with you all!

Sincerely,



Tracey Cohen Paliath

## **The Bureau of Homeless Services**

**Heather Sheridan, Director of Homeless Services**

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**I. Definitions**

<b>COMAR</b>	Code of Maryland Regulations. This set of regulations interprets the details of the laws passed by the State Legislature.
<b>Crisis Shelter Home</b>	Defined in COMAR as a facility that provides shelter, meals, information and referral service and counseling.
<b>Department of Human Resources</b>	Referred also as the “Department” or “DHR” throughout this guide, is the state agency responsible for assisting individuals with economic need. DHR houses the Family Investment Administration’s Bureau of Homeless Services.
<b>Family Unit</b>	Defined in COMAR as an individual or one or more adults and children living together as a family.
<b>Homeless Family Unit</b>	Defined in COMAR as a single or a family household without housing and lacking resources to provide housing.
<b>Homeless Woman</b>	Defined by COMAR as a female 18 years old or older who is without shelter, and who is not eligible for or not able to be housed by another shelter facility or housing service at the time of application
<b>Housing Crisis</b>	A situation involving a family unit that is threatened with the immediate loss of housing or other shelter, without resources to prevent an impending eviction; or are otherwise at risk of becoming homeless.
<b>Local Administering Agency (LAA)</b>	The entity identified by DHR to receive the grant funding for a particular jurisdiction. This same entity identifies secondary grantees/grant recipients to work directly with clients to provide the services supported by the grant. In some cases the LAA can also be a direct recipient of grant funding for said program.
<b>Maryland State Homelessness Data Warehouse (MSHDW)</b>	A resource that will collect aggregate data about homeless services from each jurisdictional HMIS system. The MSHDW is overseen by the Department of Housing and Community Development (DHCD) and is supported by DHR and the Department of Health and Mental Hygiene (DHMH).
<b>Resident Advocate (RA)</b>	A staff position within a provider organization that is financed by DHR through the Service Linked Housing program.
<b>Service Provider</b>	A public or private nonprofit shelter that contracts with DHR or a local administering agency (LAA) to provide services under the program.
<b>Secondary Grantee/ Sub-Grantee</b>	The eligible applicants to be recipient agencies of grant funding from the Local Administering Agency to provide direct programming to clients. These can include but are not limited to non-profit agencies, agencies of local government, public Housing Authorities, for-profit organizations in partnership with non-profit agencies and/or local government.

## II. Policy Introduction

### *Maryland Human Services Code*

Maryland Human Services Code **6-417-6-427**, Part III entitled “*Shelter, Nutrition, and Service Program for Homeless Individuals and Families*” requires the Department of Human Resources (DHR) to “adopt regulations to govern the development, implementation, and evaluation of policies and programs to make homelessness rare and, if it occurs, of brief duration.”

The Human Services Article of the Maryland Code, **6-430**, part IV entitled “*Homeless Women – Crisis Shelter Home Program*” is the law that establishes a program to provide crisis shelter homes, meals and counseling to clients.

As a result, COMAR, Title 07, Chapters 17, 18 and 19 were written to establish the five homeless grant programs throughout the state:

Chapter 17	Homeless Women – Crisis Shelter Home (HWCSH)
Chapter 18	Service Linked Housing Program (SLHP)
Chapter 19	Emergency and Transitional Housing and Services Program (ETHS) Housing Counselor and Aftercare Program (HCAP) Homelessness Prevention Program (HPP)

### *Navigating the Web*

The Maryland Human Services Code can be found on the General Assembly of Maryland’s website by selecting “Human Services” in the drop down menu and then choosing the appropriate section. *Click here for direct access:* [Statute Look Up](#) (1)

COMAR Regulations and the goals of each program can be found through the Office of the Secretary of State’s website by looking up Title 07.

*Click here for direct access:* [Title 07, Department of Human Resources](#) (2)

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1 <http://mgaleg.maryland.gov/webmga/frmStatutes.aspx?pid=statpage&tab=subject5>

2 [http://www.dsd.state.md.us/comar/subtitle\\_chapters/07\\_Chapters.aspx](http://www.dsd.state.md.us/comar/subtitle_chapters/07_Chapters.aspx)

### III. Basic Criteria for all Grant Recipients

All grant recipients of the Department of Human Resources' (DHR) Bureau of Homeless Services (BHS) must meet the following criteria:

1. **Be a public agency**, have a non-profit status, or be a profit-motivated entity in partnership with a non-profit or public agency and work from a client-centered approach to ensure the positive outcomes for all clients seeking service.
2. **Comply with all federal and state requirements as outlined in the law**, and abide by all grant guidelines and regulations as outlined in the COMAR, Chapters 17, 18 and 19; Use all forms required by BHS and the Local Administering Agency (LAA).
3. **Comply with Federal and state anti-discrimination policies**: A client non-discrimination policy must be included with every grant application. This policy shall be substantially similar to the enclosed requirements of COMAR 07.01.03. If not, the enclosed DHR non-discrimination policy shall be used.
4. **Have a formalized grievance procedure**: Providers must give written notification of the right to, and verbal notification of the procedure for, initiating a grievance procedure or appeal for a fair hearing, to each applicant of program service. There also must be a grievance procedure in case of a disputed decision; and, send a summary of the outcome of any dispute to the BHS within 7 business days of receipt of grievance notice.
5. **Function with sound financial and program management**, be in accordance with Generally Accepted Accounting Principles (GAAP) and be in compliance with all other federal and state programs where funding is received. All grant recipients will:
  - **Acknowledge** funding received from DHR in all related publications.
  - **Maintain** accounting and record keeping systems that control and identify contract funds, track all expenditures and generate statistical reports.
6. **Purchase goods and services from minority-owned and operated companies when possible, especially when using BHS grant funding.**
7. **Maintain all books, client records and financial documents** in secure locked location and ensure that these are kept for at least **3 years** following the date of the audit or end of grant.
  - LAAs and providers receiving DHR funding may not disclose identifying information regarding service applicants or recipients to any agency or individual without a written release from the client. DHR employees authorized to monitor or audit the program are exempt from this requirement.

8. **Use a Homelessness Management Information System (HMIS) to enter and track data and share data with the Maryland State Homelessness Data Warehouse (MSHDW) on a regular basis.** The statistical information gathered from client forms should be used by the Sub-Grantee as the basis for submitting monthly financial and activity reports.
9. **LAAs must develop policies and protocols to guide the work of sub-grantees to meet the requirements outlined in this policy guide.**
10. **LAAs and Sub-Grantees must keep copies of back-up documentation to verify expenses covered by DHR grants.** All expenses must meet the allowable use of funds outlined in this guide.
11. **LAAs and providers must actively participate in the Regional Homeless Board (RHB) and attend meetings on a regular basis.**
  - The RHB must **work closely** with the local Continuum of Care (CoC) and the statewide Interagency Council on Homelessness (ICH) to:
    - Generate and leverage local funds to support facilities and programs that serve the homeless in their area, and
    - Develop a plan to meet the emergency, intermediate, and long-term needs of the homeless as well as a plan to prevent homelessness in the jurisdiction.
  - Board membership should be comprised of representatives from **key community stakeholders** such as:
    - Homeless services providers
    - Community services agencies (public and private)
    - Government entities such as the local Department of Social Services (DSS), local Health Department, local housing agency and/or local education agency
    - Homeless or formerly homeless persons
    - Emergency management/planning entities for cold weather sheltering
    - Charitable and religious groups
    - Business community
    - Coalitions and citizen groups
    - Correctional agency representatives to assist with exit planning to prevent homelessness
  - Each RHB must prepare a **report** at the end of the year that details progress made during the year.

## IV. Homeless Women- Crisis Shelter Home

### *A. Program Description*

The Homeless Women-Crisis Shelter Home Program (HWCSH) provides grant funding for facilities that provide temporary shelter/safe accommodation, meals, information and referral services, and counseling for homeless women and their children in Maryland. Services are delivered by community-based agencies (Service Providers) that assess and address the needs of women at the local level. The Shelter home shall develop a service contract with the resident that is designed to secure a stable living environment, secure any entitlements or benefits, secure education, training, or employment opportunities, as appropriate to the client's capacity and resolve the problems that led to the resident's homelessness.

- All sheltering policies must be applied consistently to all households and in accordance with COMAR. Set policies must include what is required of a client staying in emergency shelter and what behaviors will result in termination of shelter.
- Clients must remain in compliance with a written case plan. Copies of all sheltering policies must be presented to the client during intake signed by the client and placed in the client folder.

### *B. Funding Requirements*

Funding is to be used to cover staff salary and shelter operations to provide room and board, counseling, and referral services to homeless women and children. Jurisdictions receiving this funding are required to offer a 24-hour crisis hotline to assist in referring clients to shelter. The other services include direct resource referral for housing, physical and mental health care, education, training, employment services, and case management services as well as follow-up services as needed to the client in the community if not available elsewhere.

All organizations meeting eligibility criteria are encouraged to apply for program funds. To receive funding from HWCSH, the LAA and Sub-Grantee must abide by all fiscal reporting requirements outlined in COMAR 07.01.17.08 related to book keeping, records, evidence of all expenditures are required by the Department on a monthly basis. Finally, certification of current non-profit status must be on file with the LAA before a HWCSH grant is awarded.

In addition, the LAA must do the following:

- **Give Service Providers a copy of the relevant guidelines and regulations**, as well as other materials necessary for the implementation of the program.
- **Inform all known local organizations providing services to homeless people about the availability of funds**, using list serves, social media, advertisements, letters, telephone contacts, or any other means at its disposal.
- **Monitor** all HWCSH funded local Sub-Grantees annually and **attend meetings** of the Local Board on Homelessness.

- **Maintain client data tracking in HMIS**, cooperate with the Maryland State Homelessness Data Warehouse (MSHDW) and the Interagency Council on Homelessness (ICH).

#### Allowable Use of Funding

Funds may be used to pay staff salaries of those running or managing the family shelter facilities. The funds may also be used to cover expenses related to shelter operations, such as but not limited to: electricity and other utility bills, food costs or food service/delivery costs, furniture and or supplies for the shelter such as cleaning, linen, or laundry costs and furniture for the shelter residents such as beds, chairs, cribs etc., transportation costs, such as gas/mileage to transport staff and clients to client medical appointments or housing interviews.

If no shelter exists or is unavailable at the time of need, individual grant funding can be applied towards the cost of overnight motel stays for a family or single.

#### Unallowable Use of Funding

Funds may not be used to purchase a vehicle for the organization, staff furniture or food expenses. Funds may not be allocated to any organization that requires participation in religious activities as a condition for receiving housing or services.

If programs have any questions about acceptable use of funds, please review the categories listed on the monthly expenditure and activity forms and also consult with your LAA contact before contacting BHS.

### ***C. Reporting Requirements***

The Department will use monthly reporting data from LAAs to project and revise funding amounts for the following fiscal year. For the duration of the grant period, each LAA shall submit copies of the following forms:

#### **1. Monthly Statistical Report Form submitted by each Sub-Grantee**

- This report is due to the BHS **by the 15<sup>th</sup> of the month following the report month**. This requirement will be strictly enforced. Reports are required even if there were no activities for the month. Please note, these are to be submitted electronically as an excel document.

#### **2. Monthly Expenditure Report Form**

- The Monthly Expenditure Report form is due **by the 15th of the month following the report month**. These reports must be signed by the LAA and a hard copy mailed to the BHS office. An electronic copy can also be scanned and emailed to BHS, but does not fulfill the requirements of the grant agreement. Expenditure reports are required even if there were no activities for the month. Failure to submit timely reports will be a consideration in future funding.

#### **3. Budget Modification Forms**

- A Budget Modification Form is only required to request budget changes due to unspent funds in one line of the budget to be spent on a different budget line

(where allowed). This form must be completed by the grant recipient and forwarded to the LAA for approval. Once approved by the LAA it must be forwarded to the BHS for final approval no later than April 30th. No budget modifications will be permitted without prior written approval (via email or letter) by the LAA and the BHS.

#### Late Reports

Jurisdictions whose reports are more than thirty (30) days late will receive a call from BHS's staff and given 48 hours in which to submit the report. Jurisdictions that fail to submit the report within that time frame will receive a non-compliance letter and are subject to suspension, reduction, and/or re-distribution of their grant award. Reports later than sixty (60) days may result in grant termination.

#### ***D. Monitoring Requirements***

BHS will monitor select LAAs each year. During the monitoring visit, BHS staff will speak with staff providing oversight to the program and review a variety of reports used to complete the monthly activity and fiscal reports. BHS staff may also request to see client case files, expenditure receipts and/or may request to visit a provider facility.

The LAA is required to monitor all Sub-Grantees at least once during the programmatic year. All program monitoring forms for the visits conducted by the LAA to the Sub-Grantees shall be submitted all together, to the BHS **no later than April 30th of the fiscal year**.

- All program monitoring visits conducted by the LAA shall include the BHS Sub-Grantee Monitoring Checklist and Case Record Monitoring Form. Substitutes are not allowed. All forms shall be submitted in their entirety to the BHS.

#### Financial Audit

LAAs may be required by the BHS to submit an audit of their financial operations including compliance with program regulations and guidelines affecting the expenditure of funds. The audit should meet generally accepted auditing standards and should be prepared by a Certified Public Accountant and show, at minimum, expenses and receipts (if applicable) for the most recent fiscal year.

#### Case Records

All Service Providers must maintain a case record for each client that receives support or funding that includes the following:

- Client Application (Providers may use their own form with approval from the BHS.)
- Verification of the applicant's identity (photo ID is preferred)
- Documentation of services provided including signed case plan

Note: The application must be signed by the applicant or by the applicant's authorized representative who shall be at least 18 years old and not employed by the agency to which the application is being submitted. If photo ID is unavailable, the service provider must document other efforts to verify the applicant's identity. The inability to verify the identity of the applicant is not a reason to deny assistance to the applicant.

## V. Service Linked Housing Program

### A. Program Description

The Service-Linked Housing Program (SLHP) is intended to support a staff position referred to as a “resident advocate” (RA). The RA must provide linkages for low-income persons living in permanent housing to supportive services in the community to help them maintain their housing and not become homeless. This can include but is not limited to linking residents to supportive services such as job training, health care, budgeting counseling, parenting skills, substance treatment, etc. This grant can support the cost of staff that assist clients to apply for food, medical and other benefits available to low income clients. The RA under this grant source must locate and obtain services and facilitate the resident’s participation in the surrounding community. The RA can also conduct workshops with community resources on topics such as financial planning, budgeting, literacy, interpersonal skills, computer and parenting skills.

- All policies must be applied consistently to all households and in accordance with COMAR. Set policies must include what is required of a client participating in the program and what behaviors will result in termination from the program.
- Clients must remain in compliance with a written case plan. Copies of all program policies must be presented to the client during intake, signed by the client and placed in the client folder.

### B. Funding

#### Requirements

All organizations meeting eligibility criteria are encouraged to apply for program funds. To receive funding from SLHP, the LAA and Sub-Grantee must abide by all fiscal reporting requirements outlined in COMAR 07.01.18.06 and .08 related to book keeping, records, evidence of all expenditures and income. Expenditure statements are due to the BHS on a monthly basis.

In addition, the LAA, must do the following:

- **Give Sub-Grantees a copy of the relevant guidelines and regulations**, as well as other materials necessary for the implementation of the program.
- **Maintain client data tracking in HMIS**, cooperate with the Maryland State Homelessness Data Warehouse (MSHDW) and the Interagency Council on Homelessness (ICH).

#### Allowable Use of Funding

Funds can be used only for salary, FICA, Unemployment Insurance and other benefits (health, vacation, etc.) for resident advocates, and for specified expenses related to assisting clients.

**Administrative costs** can include those associated with data collection and reporting requirements, as well as for telephone expenses, supplies, postage, copying.

- Local jurisdictions may allocate no more than 7.5% of the total grant amount towards administrative costs. The LAA should receive no more than 5% of the total grant amount

and the providers should receive the rest of the allocation. During any program year, unspent administrative funds may be reallocated to other allowable expenses. All requests must be made through a budget modification form for approval by the BHS.

Unallowable Use of Funding

Funds may not be used for direct rental assistance or move out funds to tenants. Nor can the money be used for start-up funds or capital costs for a new facility. Funds may not be allocated to any organization that requires participation in religious activities as a condition for receiving housing or services.

If programs have any questions about acceptable use of funds, please review the categories listed on the monthly expenditure and activity forms and also consult with your LAA contact before contacting BHS.

**C. Reporting Requirements**

For the duration of the grant period, each LAA shall submit copies of the following forms to BHS by the dates listed:

**1. Quarterly Activity Report (QAR)**

- This report is due to the BHS on the following dates: **October 15<sup>th</sup>, January 15<sup>th</sup>, April 15<sup>th</sup> and July 15<sup>th</sup>** throughout the fiscal year. This report includes statistics about those served for the prior 3 months before the report is due. This report includes statistical data specific to the program participants served during the quarterly report period.

<b>Data Months</b>	<b>Report Due</b>
July, August, September	October, 15 <sup>th</sup>
October, November, December	January, 15 <sup>th</sup>
January, February, March	April, 15 <sup>th</sup>
April, May, June	July, 15 <sup>th</sup>

**2. Monthly Expenditure Report Form**

- The Monthly Expenditure Report form is due every month **by the 15th of the month**. These reports must be signed by the LAA and a hard copy mailed to the BHS office. An electronic copy can also be scanned and emailed to BHS, but does not fulfill the requirements of the grant agreement. Expenditure reports are required even if there were no activities for the month. Failure to submit timely reports will be a consideration in future funding.

**3. Budget Modification Forms**

- A Budget Modification Form is required when an LAA or Sub-Grantee want to change use of funds from what is approved in the budget sheet included with the final grant agreement. A form is required when funds are moved between allowable expenses, or when funds are unspent in one area and need to be shifted to a different allowable expense. A budget modification form must be completed by the grant recipient and forwarded to the LAA for approval. Once approved by

the LAA the form must be forwarded to the BHS for final approval no later than April 30<sup>th</sup> or within 30 days of the planned change, whichever is sooner. No budget modifications will be permitted without prior written approval (via email or letter) by the LAA and the BHS.

#### Late Reports

Jurisdictions whose reports are more than thirty (30) days late will receive a call from BHS staff and given 48 hours in which to submit the report. Jurisdictions that fail to submit the report within that time frame will receive a non-compliance letter and are subject to suspension, reduction, and/or re-distribute the balance of their grant award. Reports later than sixty (60) days may result in grant termination.

#### ***D. Monitoring Requirements***

The BHS will monitor select LAAs annually. During the monitoring visit, BHS staff will speak with staff providing oversight to the program and review a variety of reports used to complete the monthly activity and fiscal reports. BHS staff may also request to see client case files, expenditure receipts and/or may request to visit a provider facility. Where the LAA is also a Service Provider, they will be monitored as both the LAA and the Service Provider.

The LAA is required to monitor all Sub-Grantees at least once during the programmatic year. All program monitoring forms for the visits conducted by the LAA to the Sub-Grantees shall be submitted all together, to the BHS **no later than April 30th of the fiscal year.**

- All program monitoring visits conducted by the LAA shall include the BHS Sub-Grantee Monitoring Checklist and Case Record Monitoring Form. Substitutes are not allowed. All forms shall be submitted in their entirety to the BHS.

#### Financial Audit

LAAs may be required by the BHS to submit an audit of their financial operations including compliance with program regulations and guidelines affecting the expenditure of funds. The audit should meet generally accepted auditing standards and should be prepared by a Certified Public Accountant and show, at minimum, expenses and receipts (if applicable) for the most recent fiscal year.

#### Case Records

All Service Providers must maintain a case record for each client that receives support or funding that includes the following:

- Client Application (Providers may use their own form with approval from the BHS.)
- Verification of the applicant's identity (photo ID is preferred)
- Documentation of services provided including signed case plan

Note: The application must be signed by the applicant or by the applicant's authorized representative who shall be at least 18 years old and not employed by the agency to which the application is being submitted. If photo ID is unavailable, the service provider must document other efforts to verify the applicant's identity. The inability to verify the identity of the applicant is not a reason to deny assistance to the applicant.

## VI. Emergency and Transitional Housing and Services Program

### A. Program Description

The Emergency and Transitional Housing and Services Program (ETHS) provides funding for shelter operations and support services, start up funding for new programs as well as limited rent and mortgage assistance.

- Please note that ETHS has been and can continue to be used to help clients maintain housing through eviction prevention. However, since all jurisdictions that receive ETHS also receive Homelessness Prevention Program (HPP) funds, HPP funding should be used first towards eviction prevention and then focus on move out supports. More details are included in section B below.
- All sheltering policies must be applied consistently to all households and in accordance with COMAR. Set policies must include what is required of a client staying in emergency shelter and what behaviors will result in termination of shelter.
- Clients must remain in compliance with a written case plan. Copies of all sheltering policies must be presented to the client during intake and signed by the client and placed in the client folder.

To receive funding from ETHS, the LAA and Sub-Grantees must abide by all client eligibility and service delivery requirements as outlined in COMAR 07.01.19.05.

### B. Funding Requirements

All organizations meeting eligibility criteria are encouraged to apply for program funds. To receive funding from ETHS, the LAA and Sub-Grantees must abide by all fiscal reporting requirements outlined in COMAR.

In addition, the LAA, must do the following:

- **Give Sub-Grantees a copy of the relevant guidelines and regulations**, as well as other materials necessary for the implementation of the program. All service providers must have a **written policy** that summarizes what services they offer to homeless families and individuals.
- **Inform all known local organizations providing services to homeless people about the availability of funds**, using list serves, social media, advertisements, letters, telephone contacts, or any other means at its disposal.
- **Monitor all ETHS funded local Sub-Grantees annually and attend meetings of the Local Board on Homelessness.**
- **Maintain client data tracking in HMIS**, cooperate with the Maryland State Homelessness Data Warehouse (MSHDW) and Interagency Council on Homelessness (ICH).

### Allowable Use of Funding

- **Maintenance/ Operation Costs.** Costs associated with managing existing beds in shelters (emergency, transitional, day time/drop in facilities or bed nights in a motel). Funds may be used towards the following expenses:
  - Electricity and other utility bills, food costs or food service/delivery costs, furniture and or supplies for the shelter such as cleaning, linen, or laundry costs and furniture for the shelter residents such as beds, chairs, cribs, etc., facilities maintenance costs incurred by a provider or paid to an outside vendor if contracted out and trash removal. Transportation costs, such as gas/mileage to transport staff and clients to client medical appointments or housing interviews.
  - If no shelter exists or is unavailable at the time of need grant funding can be applied towards the cost of overnight motel stays for a family or single.
  
- **Case Management and/or Staff Salary.** This includes, but is not limited to staff that manage and maintain shelter, case managers that assess and respond to client needs, assist in developing and following a case plan, staff that identify and help people secure housing and services that link clients to other services and advocating for services on the client's behalf.
  - It is expected that the majority of this funding will go towards the costs associated with providing shelter for clients and not employee salary or benefits.
  
- **Cold Weather Sheltering.** Each jurisdiction is required to provide emergency cold weather shelter beds in accordance with their local emergency cold weather plan. This plan must be sent to the BHS during the fall of each calendar year. ETHS funding can be used to support the additional sheltering needs during the cold weather months.
  
- **Move out Funds.** Funding provided through the ETHS program can be used to pay one-time move out fees including one (1) month of rent and/or security deposit to assist clients in moving out of shelter.
  
- **Eviction Prevention.** Since all jurisdictions that receive ETHS also receive Homelessness Prevention Program (HPP) funds, HPP funding should first be used to assist with eviction prevention then ETHS funding can be applied. If being used for eviction prevention, clients must present verification of a pending eviction or foreclosure and the client can only receive up to one (1) month of back rent to maintain housing. Additionally, the following must be true:
  - Payment will prevent the client's eviction or foreclosure, and
  - The service provider determines that the client will be able to continue in the home or to move to other permanent housing through payment to or arrangement with the landlord or mortgage holder. Clients may receive the emergency rent or mortgage subsidy service no more than once in any state fiscal year.

- **Transportation.** This includes the cost of transporting homeless people to and from shelter facilities, meal programs, or case management service programs. This may not include vehicle lease or purchase.
- **Food Service.** This includes meals in shelter facilities for homeless people or vouchers/checks/cash grants for meal purchases by or for people who are homeless when other funding sources are not available.
- **Client Supplies.** This can include anything needed to purchase for clients' use while in shelter, such as furniture, hygiene kits or supplies, clothing, laundry fees, etc.
- **Administrative costs** can include those associated with data collection and reporting requirements, as well as for telephone expenses, supplies, postage, copying.
  - Local jurisdictions may allocate no more than 7.5% of the total grant amount towards administrative costs. The LAA should receive no more than 5% of the total grant amount and the providers should receive the rest of the allocation. During any program year, unspent administrative funds may be reallocated to other allowable expenses. All requests must be made through a budget modification form for approval by the BHS.

Unallowable Use of Funding

Funds may not be used for the following:

- Vehicle lease or purchase
- Funding for rent or mortgage payment beyond the first month or security deposit.
- Administrative costs may not exceed more than 7.5% of the total grant.

Funds may not be allocated to any organization that requires participation in religious activities as a condition for receiving housing or services. If programs have any questions about acceptable use of funds, please review the categories listed on the monthly expenditure and activity forms and also consult with your LAA contact before contacting BHS.

***C. Reporting Requirements***

The Department will utilize monthly reporting data from LAAs to project and revise funding amounts for the following fiscal year. For the duration of the grant period, each LAA shall submit copies of the following forms:

**1. Monthly Statistical Report Form submitted by each Sub-Grantees**

- This report is due to the BHS **by the 15<sup>th</sup> of the month following the report month.** This requirement will be strictly enforced. Reports are required even if there were no activities for the month. Please note, these are to be submitted electronically as an excel document.

**2. Monthly Expenditure Report Form**

- The Monthly Expenditure Report form is due **by the 15th of the month following the report month.** These reports must be signed by the LAA and a

hard copy mailed to the BHS office. An electronic copy can also be scanned and emailed to BHS, but does not fulfill the requirements of the grant agreement. Expenditure reports are required even if there were no activities for the month. Failure to submit timely reports will be a consideration in future funding.

### **3. Budget Modification Forms**

- A Budget Modification Form is only required to request budget changes due to unspent funds in one line of the budget to be spent on a different budget line (where allowed). This form must be completed by the grant recipient and forwarded to the LAA for approval. Once approved by the LAA it must be forwarded to the BHS for final approval no later than April 30th. No budget modifications will be permitted without prior written approval (via email or letter) by the LAA and the BHS.

#### Late Reports

Jurisdictions whose reports are more than thirty (30) days late will receive a call from BHS staff and given 48 hours in which to submit the report. Jurisdictions that fail to submit the report within that time frame will receive a non-compliance letter and are subject to suspension, reduction, and/or re-distribution of their grant award. Reports later than sixty (60) days may result in grant termination.

#### ***D. Monitoring Requirements***

The BHS will monitor select LAAs annually. During the monitoring visit, BHS staff will speak with staff providing oversight to the program and review a variety of reports used to complete the monthly activity and fiscal reports. BHS staff may also request to see client case files, expenditure receipts and/or may request to visit a provider facility. Where the LAA is also a Service Provider, they will be monitored as both the LAA and the Service Provider.

The LAA is required to monitor all Sub-Grantees at least once during the programmatic year. All program monitoring forms for the visits conducted by the LAA to the Sub-Grantees shall be submitted all together, to the BHS **no later than April 30th of the fiscal year.**

- All program monitoring visits conducted by the LAA shall include the BHS Sub-Grantee Monitoring Checklist and Case Record Monitoring Form. Substitutes are not allowed. All forms shall be submitted in their entirety to the BHS.

#### Financial Audit

LAAs may be required by the BHS to submit an audit of their financial operations including compliance with program regulations and guidelines affecting the expenditure of funds. The audit should meet generally accepted auditing standards and should be prepared by a Certified Public Accountant and show, at minimum, expenses and receipts (if applicable) for the most recent fiscal year.

### Case Records

All Service Providers must maintain a case record for each client that receives support or funding that includes the following:

- Client Application (Providers may use their own form with approval from the BHS.)
- Verification of the applicant's identity (photo ID is preferred)
- Documentation of services provided including signed case plan

Note: The application must be signed by the applicant or by the applicant's authorized representative who shall be at least 18 years old and not employed by the agency to which the application is being submitted. If photo ID is unavailable, the service provider must document other efforts to verify the applicant's identity. The inability to verify the identity of the applicant is not a reason to deny assistance to the applicant.

## VII. Housing Counselor and Aftercare Program

### *A. Program Description*

The Housing Counselor and Aftercare Program (HCAP) provides grant funds for a Housing Counselor (HC) staff position. The purpose of the HC is to assist homeless families or individuals or those in imminent danger of a housing crisis, in obtaining and maintaining permanent housing. This can include supportive services as housing searches are underway or case management while in housing as well as aftercare case management support to maintain housing. Providers who employ an HC must strictly follow the expectations outlined in COMAR 07.01.19.06.C.1 while serving clients seeking housing as well as those that attain housing.

- All HCAP policies must be applied consistently to all households and in accordance with COMAR. Set policies must include what is required of a client participating in the program and what behaviors will result in termination from the program.
- Clients must remain in compliance with a written service plan. Copies of all HCAP policies must be presented to the client during assessment (entry into the program), signed by the client and placed in the client folder.

### *B. Funding Requirements*

To receive funding for this program, the LAA and Sub-Grantee must abide by all programmatic requirements outlined in COMAR. The credentials of all HCs hired to fulfill the responsibilities of this grant program must be sent to the BHS upon request or upon hiring of a new candidate. When LAAs are hiring a new candidate, his/her credentials must be approved by the BHS prior to offering the position to the candidate. If the position goes vacant for more than 45 days, the BHS may consider re-allocating the funding received.

In addition, the LAA must do the following:

- **Give Sub-Grantees a copy of the relevant guidelines and regulations**, as well as other materials necessary for the implementation of the program.
- **Maintain client data tracking in HMIS**, cooperate with the Maryland State Homelessness Data Warehouse (MSHDW) and the Interagency Council on Homelessness (ICH).

### Allowable Use of Funding

HCAP funding can be used for salary and FICA for Housing Counselors and Aftercare Case Managers. Client-related expenses such as first month's rent and security deposit, transportation for housing searches (cab fare, reimbursement for transportation costs incurred by the HC, or public transportation fees), moving expenses, essential furnishings for clients, storage, arrearages, credit checks and housing application fees, security deposits, utility deposits and other identified needs. The LAA shall provide funds for additional costs related to, or as a result of, operating the program.

### Unallowable Use of Funding

Funds may not be used for the following:

- Lease or purchase of a vehicle
- Purchase of office furniture for the organization
- Ongoing rental assistance
- Administrative costs related to running programs or recruitment to hire for the position.

Funds may not be allocated to any organization that requires participation in religious activities as a condition for receiving housing or services. If programs have any questions about acceptable use of funds, please review the categories listed on the monthly expenditure and activity forms and also consult with your LAA contact before contacting BHS.

### ***C. Reporting Requirements***

For the duration of the grant period, each LAA shall submit copies of the following forms:

#### **1. Monthly Statistical Report submitted by each Sub-Grantee or LAA with an HC**

- It is expected that for each full time HC, there should be a minimum of 100 new clients served for the fiscal year.
- This report is due to the BHS **by the 15<sup>th</sup> of the month following the report month**. This requirement will be strictly enforced. Reports are required even if there were no activities for the month. Please note, these are to be submitted electronically as an excel document.

#### **2. Monthly Expenditure Report Form**

- The Monthly Expenditure Report form is due **by the 15th of the month following the report month**. These reports must be signed by the LAA and a hard copy mailed to the BHS office. An electronic copy can also be scanned and emailed to BHS, but does not fulfill the requirements of the grant agreement. Expenditure reports are required even if there were no activities for the month. Failure to submit timely reports will be a consideration in future funding.

#### **3. Budget Modification Forms**

- A Budget Modification Form is only required to request budget changes due to unspent funds in one line of the budget to be spent on a different budget line (where allowed). This form must be completed by the grant recipient and forwarded to the LAA for approval. Once approved by the LAA it must be forwarded to the BHS for final approval no later than April 30th. No budget modifications will be permitted without prior written approval (via email or letter) by the LAA and the BHS.

### ***D. Monitoring Requirements***

The BHS will monitor select LAAs annually. During the monitoring visit, BHS staff will speak with staff providing oversight to the program and review a variety of reports used to complete the monthly activity and fiscal reports. BHS staff may also request to see client case files, expenditure receipts and/or may request to visit a provider facility. Where the LAA is also a Service Provider, they will be monitored as both the LAA and the Service Provider.

The LAA is required to monitor all Sub-Grantees at least once during the programmatic year. All program monitoring forms for the visits conducted by the LAA to the Sub-Grantees shall be submitted all together, to the BHS **no later than April 30th of the fiscal year**.

- All program monitoring visits conducted by the LAA shall include the BHS Sub-Grantee Monitoring Checklist and Case Record Monitoring Form. Substitutes are not allowed. All forms shall be submitted in their entirety to the BHS.

#### Financial Audits

LAAs may be required by the BHS to submit an audit of their financial operations including compliance with program regulations and guidelines affecting the expenditure of funds. The audit should meet generally accepted auditing standards and should be prepared by a Certified Public Accountant and show, at minimum, expenses and receipts (if applicable) for the most recent fiscal year.

#### Case Records

All Service Providers must maintain a case record for each client that receives supports or funding that includes the following:

- Client Application (Providers may use their own form with approval from the BHS.)
- Verification of the applicant's identity (photo ID is preferred)
- Documentation and verification of the applicant's need (e.g., eviction notice)
- Proof of payment (e.g., check stub, copy of check, etc.)
- Any other documentation of services provided

Note: The application must be signed by the applicant or by the applicant's authorized representative who shall be at least 18 years old and not employed by the agency to which the application is being submitted. If photo ID is unavailable, the service provider shall document other efforts to verify the applicant's identity. The inability to verify the identity of the applicant is not a reason to deny assistance to the applicant.

#### ***E. Personnel Contract***

The HC will enter into a personnel contract with either local government or the local agency where the position is based and is not considered an employee of the State of Maryland. The salary of each HC should be based on a full year (52 weeks) at an estimated annual amount of \$38,117 (not including FICA). The salary level may be adjusted to suit local agency or county pay scales. Approval from the BHS is required. If the position is not filled for the full year, the salary paid to the counselor should still be based on the full-year pay scale. HCs are subject to the personnel policies of the employing agency. At no time should an HC handle cash; doing so is grounds for termination.

## VIII. Homeless Prevention Program

### A. Program Description

The purpose of the Homelessness Prevention Program (HPP) is to assist individuals and families facing a housing crisis. As outlined in COMAR 07.01.19.07, case management and counseling is provided to those households in need and for early intervention to prevent eviction. Grant funding is used for training clients on budgeting and other life skills, education on tenant rights and responsibilities, and mediation between landlord and tenant. One-time direct grants to family units to prevent eviction are also available through this program. Leases must be in the name of the client applying for funds. If not, clients will not be eligible for this funding. The Service Provider must determine that the family unit will be able to continue to stay in the permanent housing or move to other permanent housing through payment to or arrangement with the landlord.

- All policies must be applied consistently to all qualifying households and in accordance with COMAR.
- Clients must comply with a documented case plan, copies of which must be placed in the client folder.

### B. Funding

#### Requirements

All organizations meeting eligibility criteria are encouraged to apply for program funds. To receive funding from HPP, the LAA and Sub-Grantee must abide by all fiscal reporting requirements outlined in COMAR.

In addition, the LAA, must do the following:

- **Give Sub-Grantees a copy of the relevant guidelines and regulations**, as well as other materials necessary for the implementation of the program.
- **Monitor all HPP funded local Sub-Grantees annually and attend meetings of the Local Board on Homelessness.**
- **Maintain client data tracking in HMIS**, cooperate with the Maryland State Homelessness Data Warehouse (MSHDW) and the Interagency Council on Homelessness (ICH).

#### Allowable Use of Funding

Funding can be used for direct grants to prevent evictions, eviction prevention counselors or landlord tenant mediators. All costs (including court costs and fees) associated with preventing the eviction can be covered and should be paid through direct grants to the landlord.

#### Unallowable Use of Funding

Funds may not be used for current rental payments, security deposits, for shelter operations, capital improvements, or start-up costs for shelters. If programs have any questions about acceptable use of funds, please review the categories listed on the monthly expenditure and activity forms and also consult with your LAA contact before contacting BHS.

### ***C. Reporting Requirements***

The Department will utilize monthly reporting data from LAAs to project and revise funding amounts for the following fiscal year. For the duration of the grant period, each LAA shall submit copies of the following forms:

- 1. Monthly Statistical and Follow-up Report Form submitted by each Sub-Grantee**
  - These reports are due to the BHS **by the 15<sup>th</sup> of the month following the report month**. This requirement will be strictly enforced. Reports are required even if there were no activities for the month. Please note, these are to be submitted electronically as an excel document.
  
- 2. Monthly Expenditure Report Form**
  - The Monthly Expenditure Report form is due **by the 15th of the month following the report month**. These reports must be signed by the LAA and a hard copy mailed to the BHS office. An electronic copy can also be scanned and emailed to BHS, but does not fulfill the requirements of the grant agreement. Expenditure reports are required even if there were no activities for the month. Failure to submit timely reports will be a consideration in future funding.
  
- 3. Budget Modification Forms**
  - A Budget Modification Form is only required to request budget changes due to unspent funds in one line of the budget to be spent on a different budget line (where allowed). This form must be completed by the grant recipient and forwarded to the LAA for approval. Once approved by the LAA it must be forwarded to the BHS for final approval no later than April 30th. No budget modifications will be permitted without prior written approval (via email or letter) by the LAA and the BHS.

#### Late Reports

Jurisdictions whose reports are more than thirty (30) days late will receive a call from DHR's Program Administrator and given 48 hours in which to submit the report. Jurisdictions that fail to submit the report within that time frame will receive a non-compliance letter and are subject to suspension, reduction, and/or re-distribution of their grant award. Reports later than sixty (60) days may result in grant termination.

### ***D. Monitoring Requirements***

The BHS will monitor select LAAs annually. During the monitoring visit, BHS staff will speak with staff providing oversight to the program and review a variety of reports used to complete the monthly activity and fiscal reports. BHS staff may also request to see client case files, expenditure receipts and/or may request to visit a provider facility. Where the LAA is also a Service Provider, they will be monitored as both the LAA and the Service Provider.

The LAA should monitor a majority of jurisdictional Service Providers once every fiscal year. During this visit, the LAA should complete a Program Monitoring Form for each Service Provider. All program monitoring forms for the visits conducted by the LAA to the Sub-Grantees shall be submitted all together, to the BHS no later than **April 30th** of the fiscal year.

## **IX. Requirements for the Monthly Expenditure Reports (MERs)**

### ***A. Overview***

Monthly Expenditure Reports are a requirement of all Local Administering Agencies (LAAs) and Sub-Grantees (SGs). During FY2016, the BHS received an Audit from the Office of Legislative Audits (OLA) that required BHS to verify all expenses covered by DHR grant funding. The following provides guidance on this requirement.

***B. Requirements for Monthly Expenditure Reports*** - Each monthly submission must include the following forms in the following order:

#### **1. LAA Consolidated Expenditure Form**

- Must be mailed in with an original signature from LAA fiscal contact.<sup>1</sup>
- The total amount listed in the “Report Month Expenditure” column, must equal the totals from each of the individual SG expenditure form totals.
- Ensure that the name listed in the LAA field matches the name on the jurisdictional contract.
- The Report Type is accurately listed as “LAA Consolidated”
- The contract number corresponds with the contract number issued to the jurisdiction by BHS.
- All categories of spending correspond with the allowable use of funds section within each grant description.

#### **2. Sub-Grantee Expenditure Form**

- There must be one SG Expenditure form for each SG on the grant.
- No SG will receive reimbursement if not included on the initial grant application without an approved budget modification.
- Each SG must sign the form.

**3. Back-up documentation** – This is necessary to verify all expenses paid for by DHR funds. Documentation sent with MERs should only reflect spending covered by DHR grants. Funds used from other grants must not be included with MER submissions, as it will delay processing.

### ***C. Acceptable forms of Back-Up Documentation***

- 1. Salary Verification** – Summary report from payroll software that show the dollar amount the person was paid, which must match the amount the LAA or SG is requesting reimbursement for.
- 2. Motel/Hotel Vouchers** – A receipt from the establishment, showing full amount paid along with the client name. If multiple vouchers are issued throughout the month, please also include a summary sheet to show how many rooms were reserved, the client name, number of nights, room cost plus taxes and fees.

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<sup>1</sup> **Note:** All non-DSS LAAs must mail this form in with an original signature. LAAs that are local DSS offices are permitted to scan a copy of their monthly expenditure forms, with necessary back-up documentation.

3. **Maintenance / Shelter Operations** – These expenses should not include staff salary. Operational expenses should meet the allowable expenses outlined in the individual grant sections of the policy guide. Verification of shelter operation expenses can include utility bills, receipts for allowable purchases, receipts for food purchases, etc. If there are numerous expenses submitted under this category, a summary page will expedite processing of the expenditure report. If operation costs are split between multiple grant sources, please include a cover page that explains how the grant allocation is broken down and what portion of the total costs are covered.
4. **Eviction-Prevention Stipends** – A summary sheet must be included that summarizes the number of stipends issued, including the client name and total rental arrears paid off. In addition, copies of supporting documentation to prove the pending eviction must be included as well. These can include but are not limited to a court-ordered document, documentation from the Sheriff’s office or evicting agent as well as proof that the eviction stipend was issued by the SG or LAA.

**D. Method to Submit Monthly Expenditure Reports** – Monthly expenditures must be sent in to BHS on a monthly basis.

1. **LAA’s must submit their monthly expenditure forms in their entirety**, meaning the LAA Consolidated Expenditure Form with the corresponding SG Expenditure forms and all back-up documentation in one submission.
  - Please do not send monthly forms over multiple submissions, as this will severely delay the reimbursement process.
  - Please do not submit duplicate copies of forms. If the LAA is submitting a corrected form, please write across the top, right-hand corner “CORRECTION” so BHS staff is aware.
2. **Mail submission in to BHS** – An LAA office that is not a local DSS office, must submit LAA Consolidated Expenditure forms with original signatures.
  - If the LAA is a local DSS, original signatures on the LAA Consolidated forms are not required. DSS’ are permitted to submit their monthly forms and back up documentation by email.

## X. Fees for Service

### A. Overview

According to COMAR 07.01.17.11, emergency shelter providers receiving ETHS or Homeless Women funding are *permitted*, not required to charge clients a weekly fee for emergency shelter services. If a Sub-Grantee is charging shelter clients a regular fee they must adhere to the stipulations listed below.

**For Sub-Grantees not currently charging fees, you are not required to charge fees and please disregard this section.**

- **Please note:** this guidance does not pertain to transitional housing providers charging clients fees considered rent, move-in fees or security deposits.

If a provider is charging fees to residents of emergency shelter, they must have a written policy that details the following:

- How the fees are to be collected from clients.
- How clients are to be informed about the fee policy.
- Accommodations if clients cannot pay the fee, including policy for clients with no income (**note:** clients may not be asked to leave emergency shelter if they are unable to pay the fee).
- How the fees are to be used by the provider.
- Verifying that fees do not exceed the scale outlined in COMAR 07.01.17.11.4 and that all client **Fixed Continuing Expenditures** are deducted from the clients monthly income total as outlined in COMAR 07.01.17.11.3.

### B. Encouraging Clients to Save the Fee

All clients should be encouraged to save while in shelter. Providers have the option of encouraging clients to save the weekly fee in a savings account. Some clients will want to save in an external savings account, or they may prefer to save in an internal savings account. One of the following methods to manage the fees must be chosen:

#### Clients Save Fees in Their Own External Savings Account

External savings accounts will assist clients in becoming more self-sufficient. BHS strongly encourages providers to assist clients with establishing savings accounts in a local bank to save money while in shelter. Providers must follow these steps to adhere to this policy option:

- **Clients must bring copies** of their savings account statement to their case manager on a monthly basis. The case manager will work with the client to manage the account and plan a budget to prepare them for move out.
- Copies of the savings statement and/or receipts of deposits to the account must be kept in the **client case file**.
- Programs must **establish policy guidelines** that outline the programmatic response when a client signs the Fee Determination form, agreeing to pay a fee and does not hold to that agreement.

- This policy must be presented to clients upon intake (for agreement and signature) and be posted throughout the facility.

### **Clients Save Fees in a Savings Account Established by the Provider Onsite**

If clients are **unable or uncomfortable opening a bank account** outside of the facility, but want to save their money while in shelter, an internal savings account option may be offered to those select clients to which this applies. If providers choose this option, they must establish an internal savings procedural guideline so staff and clients understand what is expected. Procedural guidelines must meet the following:

- Clients must get money orders, made out to themselves. They are not permitted to save cash onsite. No staff member should handle cash.
- All money orders must be kept in a locked safe and only one supervisory staff member may have access to the safe.
- A record for each client saving internally must be kept in a binder, one page for each client showing what deposits are made, date and the money order number. Each client must be given a receipt each time they hand in a money order to the staff.
- At least two staff members must be present to witness the deposit.

### ***C. Fees Kept by the Provider, not considered Client Savings***

If a provider collects fees from clients that are not saved in a savings account for the client, **the money is considered income to the provider**. Therefore **it is a strict requirement of the BHS** that each provider maintains detailed accounting records of all fees received. **As of July 1, 2015**, providers must:

- Establish a **“Fee Management Procedure”** that details the procedure by which the provider will follow to collect the fees, track the money collected, deposit the money and which staff will be responsible for collecting the fee. Provider must also include a detail of how the fees will be used within the program budget. This policy must be sent to the BHS for approval, at the start of the fiscal year.
- For the safety of staff, **no individual staff person is permitted to accept cash unless there is a second staff witness**. Staff are not permitted to keep cash on hand or in their desk. All cash must be kept in a locked safe, in a supervisor’s office before being deposited into a bank account. **No exceptions**.
- All **clients must receive a receipt** upon payment of the weekly fee. The receipt must include the organizations logo with the amount paid, date and signature of staff that received the fee.
- Providers must maintain a **monthly census tracking tool** that includes a list of all clients living in shelter during the month, along with notation of the clients that paid the weekly fee, the amount they paid and the date it was received and by whom (see Appendix).
- All organizations collecting fees must report on the total amount collected on a semi-annual basis to the LAA which must be reported to BHS.

The LAA is responsible for monitoring all sub-grantees collecting fees from clients on a consistent basis to ensure they are meeting this policy. LAAs must see hard copies of the Fee Determination sheets (see Appendix) in a random sampling of client files and must also see copies of fee collection logs (see Appendix).

- BHS may request copies of these forms throughout the fiscal year.
- Periodically throughout the year, BHS will require providers to report the total fees collected.
- Not adhering to this requirement could result in a loss of grant funding.

## **XI. Homelessness Management Information System (HMIS) Requirements**

### ***A. Overview***

A Homeless Management Information System (HMIS) is the information system designated and managed by local Continuums of Care (CoC) to comply with the requirements of the federal CoC Program interim rule 24 CFR 578. It is a locally-administered data system used to record and track information about clients served, individuals and families who are homeless or at risk of homelessness. In 2010 the U.S. Interagency Council on Homelessness (USICH) affirmed HMIS as the official method of measuring outcomes for homeless services providers.

### ***B. 17 Universal Data Elements***

As of October 2014, all homeless service providers are required to enter the following 17 universal data elements into HMIS for each client served:

1. Name
2. Social Security Number
3. Date of Birth
4. Race
5. Ethnicity
6. Gender
7. Veteran status
8. Disabling Condition
9. Residence Prior to Project Entry
10. Project Entry Date
11. Project Exit Date
12. Destination
13. Personal ID<sup>1</sup>
14. Household ID
15. Relationship to Head of Household
16. Client Location
17. Length of time on street, in an emergency shelter or safe haven

### ***C. Program-Specific Data Elements***

These data elements provide information about the characteristics of clients, the services that are provided and the client outcomes. The program-specific data elements that are required for federal reporting include elements that may be used by more than one federal funder program. An HMIS must have the ability to enable and restrict visibility of elements based on the funding needs of the specific program. Please use the links below to determine the program-specific data elements to track.

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<sup>1</sup> **A Personal ID (PID)** is an automatically generated identifier created by the HMIS application and must be permanent and unique to a single individual within an HMIS implementation. A PID must be created, but there is no required format as long as there is a single unique PID for every client and it contains no personally identifying information. The PID must be able to be attached to the same individual when served by multiple projects. HMIS must have functionality to allow the HMIS Lead to de-duplicate multiple records with distinct PID's that are identified as representing the same individual based on identifying information.

#### ***D. Data Entry Expectations of Providers***

Entering data into HMIS is mandatory. BHS will monitor compliance with this requirement during scheduled or unscheduled monitoring visits.

- Training should also be arranged through the **HMIS coordinator** for each jurisdiction.
- Data shall be entered into HMIS **within 24 hours of** the new or existing customer's contact with a case manager.
- All new and existing customers' information shall be updated and entered to reflect services provided **during each engagement**.
- Each participating agency shall agree to and **sign all documents regarding HMIS** policies and procedures and follow strictly, all protocols regarding sharing of information.

#### ***E. Data Collection Requirements of Domestic Violence/ Survivor Services***

A Victim Service Provider is a nonprofit or nongovernmental organization including rape crisis centers, battered women's shelters, domestic violence, transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault or stalking.<sup>1</sup>

Victim service providers that are **funded under HUD's Supportive Housing Program** are instructed not to disclose personal identifying data about any client for purposes of HMIS, per the requirements of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA).

HUD does not expect victim service providers funded through other sources to disclose personal identifying information for the purposes of HMIS. **However, please know the following:**

- **Victim service providers receiving HUD funds must use a comparable database that adheres to the same technology data standards as mainstream HMIS Systems**
- Victim service providers **must provide aggregate information in reports to HUD**. Information in these reports must be non-identifying, which can include aggregate totals or other demographic information that does not identify a victim. Since it is possible to identify many victims in rural states or small communities with only ethnicity or age and zip code, the information that victim service providers can share must be carefully scrutinized and limited.
- **Non-personally identifying information** must be further protected by being "de-identified, encrypted, or otherwise encoded."

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<sup>1</sup> [https://www.hudexchange.info/resources/documents/FinalHMISDataStandards\\_March2010.pdf](https://www.hudexchange.info/resources/documents/FinalHMISDataStandards_March2010.pdf)

Regardless of funding sources, Program Descriptor data for each homeless assistance program within the CoC operated by a victim service provider must be recorded in the HMIS (either by provider staff member or by the HMIS system administrator); with the exception of a street address for a facility that provides victim services to clients.

#### ***F. Communication with Clients about HMIS***

Basic data elements identified by HUD and are a part of HMIS shall be entered and recorded as unduplicated homeless persons receiving assistance in Maryland.

##### **Each participating agency shall:**

- Explain the purpose of the HMIS.
  - Attempt to secure release of information documents from customers before entering data.
- \*\*Under federal law (5 U.S.C. Section 552a) a government agency cannot deny shelter or services to clients who refuse to provide their SSN and this applies to all HUD-administered McKinney-Vento Act programs.

Other than name, a client can refuse to answer all other questions asked regarding the universal data elements. If a client refuses to answer a question, the case manager should enter “refused” or “don’t know” depending on the context. Case managers should make their best attempt to get the answers from the client in the initial screening or after if the information is provided in later conversations. If provided after, the case file should be updated accordingly in HMIS and in paper form.

#### ***G. HMIS and the Maryland Statewide Homelessness Data Warehouse***

Each provider throughout all 24 jurisdictions in the state contributes client data to their local HMIS system. Aggregate data from these HMIS systems, will then be copied to the Maryland statewide Homelessness Data Warehouse (MSHDW). Collection and sharing of the universal data elements within HMIS enables the state of Maryland to draw conclusions about our progress towards supporting the homeless population across our state. Therefore, **all recipients of DHR grant funding for homeless services are required to comply with data sharing to the MSHDW.**

#### ***H. Data System Requirements for HMIS***

Each participating agency should work with the local Continuum of Care Committee (CoC) to determine resources available to pay for user licenses and other fees required for the HMIS system. Computer systems shall meet the following requirements in order to run an HMIS program:

- Microsoft Windows 98 (SE), 2000, XP, ME or Macintosh OSX
- Internet Explorer 6.0+, or Firefox 2 or 3, or Safari 2, 3 or 4 (Mac)
- Flash – A high speed internet connection and Flash 9.0.115 or higher
- Windows Media – A high speed internet connection, Windows Media Player or better or WMV Player for OSX
- Cookies must be enabled.

*Navigating the Web*

**Federal Plan, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness***

**Available here:**

[http://usich.gov/resources/uploads/asset\\_library/Opening%20Doors%202010%20FINAL%20FSP%20Prevent%20End%20Homeless.pdf](http://usich.gov/resources/uploads/asset_library/Opening%20Doors%202010%20FINAL%20FSP%20Prevent%20End%20Homeless.pdf)

**A summary of the 2014 HMIS Data Standards are available here:**

<https://www.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf>

**The HMIS Data Manual is available here:**

<https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

## **XII. Appendix – Fee for Service Tracking Forms**

# Fee Determination and Agreement Form

*\*To be used only by emergency shelter programs receiving ETHS or Homeless Women funding and are currently collecting a fee for service.*

**Client Name**

**Income per Month**

**Source**

### Client Fixed Continuing Expenditures (To be Deducted From Monthly Income Amount)

Expenses Paid by Client	Monthly Amount Paid by Client
Housing-related expenses: Rent or mortgage payments, security deposit or utility costs.	
Work-related expenses: Transportation, uniforms, meals	
Child care expenses or child-support payments	
Regular payments such as for chage accounts, car payments, loans etc.	
<b>TOTAL Deductions</b>	

**\*\*Daily fee calculation must be based on monthly income, minus allowable deductions listed above.**

### Monthly Income (A) - Allowable Deductions (B) = Fee to be collected (C)

<b>A=</b>	<b>B=</b>	<b>C=</b>
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Monthly Income	Daily Charges
\$0 - \$99	None
\$100 - \$149	\$0.50
\$150 - \$199	\$1.00
\$200 - \$249	\$1.50
\$250 - \$299	\$2.00
\$300-349	\$2.50
\$350 - \$399	\$3.00
\$400 and over	\$4.00

I, \_\_\_\_\_, agree to pay \$ \_\_\_\_\_  
 per \_\_\_\_\_ beginning \_\_\_\_\_ .

The first payment is due on \_\_\_\_\_.

**I realize that the payment must be made with a money order made payable to the program. I agree to report all changes in the amount or status of my income to my caseworker immediately. Fees will be re-evaluated as needed.**

\_\_\_\_\_  
 Client Signature

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Program Coordinator Signature

\_\_\_\_\_  
 Date

## Tracking Chart: Collection of "Fee for Service" from Clients

Fee Chart for the month of: \_\_\_\_\_ Year: \_\_\_\_\_

Provider Name: \_\_\_\_\_

Address: \_\_\_\_\_

Jurisdiction: \_\_\_\_\_

Fee collection Date	Client Name		Fee Required Based on Monthly Income	Fee Paid (listed in dollars)	Last Name of Staff that Received	Initials of Staff Person	Receipt Provided to Client (Y/N)	If Fee was not received, list reason why client was unable to pay
	Last	First						
1			\$	\$				
2			\$	\$				
3			\$	\$				
4			\$	\$				
5			\$	\$				
6			\$	\$				
7			\$	\$				
8			\$	\$				
9			\$	\$				
10			\$	\$				
11			\$	\$				
12			\$	\$				
13			\$	\$				
14			\$	\$				
15			\$	\$				
16			\$	\$				
17			\$	\$				
18			\$	\$				
19			\$	\$				
20			\$	\$				

**TOTALS:** \$ - \$ -