



HOME-ARP POLICIES & PROCEDURES

HOUSING & COMMUNITY DEVELOPMENT DIVISION
150 NORTH CAPITOL BOULEVARD
BOISE, ID 83702-5920
(208) 570-6830

IDAHO RELAY SERVICE
DIAL 7-1-1
SPECIAL TOLL-FREE NUMBERS
1-800-377-3529 ASCII
1-866-252-0684 SPANISH
1-888-791-3004 SPEECH TO SPEECH
1-800-377-3529 TTY

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This document can be provided in a format accessible to persons with disabilities and/or persons with limited English proficiency upon request.

Anyone who requires an auxiliary aid, service, or translation for effective communication may contact the Housing and Community Development Division by phone at 208-570-6830 or by email at Housing@cityofboise.org. Individuals who are deaf, hard of hearing, or have speech disabilities may use the Idaho Relay Service for the Hearing Impaired to make a request for accommodation by calling 1-800-377-1363 (voice) or 1-800-377-3529 (TTY).

SPANISH

Los miembros de la comunidad pueden solicitar traducción, interpretación y/o ajustes razonables para garantizar que puedan participar plenamente en este proceso. Para realizar una solicitud, comuníquese con la División de Vivienda y Desarrollo Comunitario por correo electrónico: housing@cityofboise.org, teléfono: 208-570-6830, TTY: 1-800-377-3529, fax: 208-384-4195, o en persona en 150 N. Capitol Blvd (segundo piso).

KISWAHILI

Wana jamii wanaeza omba huduma za utafsiri au zingine za kuhakikisha kwamba wanaeza shiriki kwa ukamilifu kwenye mchakato huu. Tafadhali wasiliana na Idara ya Makao na Maedeleo ya Jamii kupitia barua pepe: housing@cityofboise.org, simu: 208-570-6830, kuduma ya Simu ya Viziwi (TTY): 1-800-377-3529, Faksi: 208-384-4195, au ujifikishe kwa 150 N. Capitol Blvd (ghorofa ya pili)

BOSNIAN

Članovi zajednice mogu zatražiti prevodjenje, tumačenje i/ili razuman smještaj kako bi osigurali da mogu u potpunosti sudjelovati u ovom procesu.

Za podnošenje zahtjeva obratite se Odjelu za stanovanje i razvoj zajednice putem emaila: housing@cityofboise.org, telefon: 208-570-6830, TTY: 1-800-377-3529, fax: 208-384-4195, ili osobno na 150 N. Capitol Blvd (2. kat).

ARABIC

للمشاركة و تقديم الطلبات من خلال تحديد موعد مقابلة شخصية او مقابلة عن طريق الهاتف وللاستفسارات او لطلب خدمات الترجمة ولتحديد المواعيد ، يرجى الاتصال بقسم الإسكان وتنمية المجتمع هاتف: 208-570-6830 ، ، Housing@cityofboise.org عبر البريد الإلكتروني: TTY: 1-800-377-3529 ، أو 150 ، 4195-384-208 فاكس: N. Capitol Blvd (الطابق الثاني).

FARSI

اعضای انجمن می توانند برای اینکه قادر به مشارکت کامل در این فرآیند باشند، درخواست ترجمه، تفسیر، و/یا کمک هی معقول دیگر کنند. برای درخواست، لطفاً از طریق ایمیل با بخش مسکن و توسعه جامعه تماس بگیرید:

housing@cityofboise.org

تلفن: ۲۰۸-۵۷۰-۶۸۳۰

تلفن ناتوانان گفتاری و/یا ناشنوا: ۱-۸۰۰-۳۷۷-۳۵۲۹

شماره فکس: ۲۰۸-۳۸۴-۴۱۹۵

یا به صورت حضوری به ادرس

150 N. Capitol Blvd (2nd floor) (طبقه دوم)

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OVERVIEW

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country.

ARP authorized the U.S. Department of Housing and Urban Development (HUD) to allocate HOME-ARP funds to states, units of general local government, insular areas, and consortia of units of general local government that qualified for an allocation of HOME funds in Fiscal Year (FY) 2021, pursuant to section 217 of the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended (42 U.S.C. 12701 et seq.) ("NAHA").

In September 2021, HUD announced that the City of Boise (City) will receive \$2,932,499 in HOME-ARP funds. The City developed a HOME-ARP Allocation Plan that became part of the City's PY2021 HUD Annual Action Plan by substantial amendment approved on September 1, 2022.

Eligible HOME-ARP activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. HOME-ARP funds must assist people in HOME-ARP "qualifying populations" which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homeless

This document outlines the policies and procedures related to the HOME-ARP program, administered by the Housing and Community Development (HCD) Division of the City's Planning and Development Services (PDS) Department. As a result of the needs assessment and gap analysis, as well as the resources available to support other potentially eligible HOME-ARP activities, the City utilizes its HOME-ARP funds to address the immediate need for intensive, wrap-around mental health and other supportive services to chronically homeless households residing in permanent supportive housing (PSH), in accordance with the City's established Preferences and Method of Prioritization outlined in its [HOME-ARP Allocation Plan](#).

This document includes information about the subrecipient award process, referral methods, service eligibility, types of services to be provided, eligible costs, administrative processes, monitoring, and compliance with other cross-cutting federal regulations. The policies and procedures contained here apply to all HOME-ARP funded projects/programs. All subrecipient awards are subject to the availability of funds and

regulations and polices associated with the specific funding source, including the HOME-ARP Implementation Notice and Appendix ([CPD-21-10](#)) and other related guidance. HCD is responsible for assuring that all regulations are adhered to through the processes related to HOME-ARP subrecipient awards, service delivery, and project close-out. All subrecipients of HOME-ARP funding are responsible for meeting the regulations contained in this handbook and for those in effect and required by any other agency. In the event standards in this handbook are more restrictive than those provided by other agencies, these standards shall supersede all other regulations, unless the differences are specifically dealt with in this handbook.

All exhibits and documents in this handbook are subject to change as the program requires or as further guidance is provided from HUD.

Policies and procedures will be reviewed and updated on an annual basis, or more frequently as needed.

METHODS OF SUBRECIPIENT SELECTION

The City subgrants HOME-ARP funds to local organization(s) to provide supportive services assisting chronically homeless households via a modified Assertive Community Treatment (ACT) model. Selection will happen on an annual basis through a competitive Notice of Funding Opportunity (NOFO) and application process. The Our Path Home (the local Continuum of Care) governing body advises on any specific information to be included in the NOFO.

COMPETITIVE PROPOSALS

This method of procurement involves more than one source submitting an offer and award of a cost-reimbursement type of contract.

1. NOFOs are publicized and identify all evaluation factors and their relative importance.
2. Proposals are solicited from an adequate number of qualified sources via an application in Neighborly; all responses are considered to the maximum extent practical.
3. A committee, established by the City, evaluates the proposals received using the scoring criteria published in the NOFO.
4. A subrecipient award is made to the responsible organization whose proposal is most advantageous to the program, with price and other factors considered.

WRITTEN AGREEMENTS

The City enters into a formal, legally binding, written subrecipient agreement with the selected organization before any HOME-ARP funds are disbursed. At a minimum, the subrecipient agreement includes:

- the amount and use of funds,
- services to be provided,
- the client referral methods and eligibility requirements for services,
- the timeframe for service provision,
- a program/project budget,
- reporting and record retention requirements,

- administrative requirements,
- applicable cross-cutting federal regulations, and
- compliance and monitoring requirements.

TIMEFRAME

On an annual basis, the City issues a NOFO and accepts applications for HOME-ARP funds. Following application evaluation, preliminary award letters are issued and the subrecipient agreement is executed. It is expected that each agreement will cover one fiscal year of service provision.

QUALIFYING POPULATIONS, PREFERENCES, & REFERRAL METHODS

ARP requires that funds be used to benefit households in specific “qualifying populations,” as defined below. Any household meeting the criteria for these populations is eligible to receive services funded through HOME-ARP.

QUALIFYING POPULATIONS

The populations below are further defined in the Final HOME-ARP Implementation Notice (CPD-21-20).

1. Homeless, as defined in [24 CFR 91.5 Homeless](#) (1), (2), or (3)
2. At risk of Homelessness, as defined in [24 CFR 91.5 At risk of homelessness](#)
3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking, as defined by HUD in [24 CFR 5.2003](#) and the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102).
4. Other populations where providing supportive services or assistance under section 212(a) of NAHA ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as households not qualifying under any of the above criteria, but meeting one of the following criteria:
 - a. Other families requiring services or housing assistance to prevent homelessness.
 - b. At greatest risk of housing instability.
 - c. Veterans and families that include a Veteran family member that meet the criteria of the qualifying populations above.

PREFERENCES

ARP establishes the qualifying populations that are eligible for assistance with HOME-ARP funds and allows a Participating Jurisdiction (PJ) to establish reasonable preferences among the qualifying populations to prioritize applicants for HOME-ARP projects or activities based on the PJ's needs and priorities.

In its HOME-ARP Allocation Plan, the City established a preference to prioritize providing intensive, wrap-around supportive services for households experiencing chronic homelessness upon project entry and who now reside in permanent supporting housing units.

Prioritization for HOME-ARP services for clients is based on the Our Path Home (OPH) Coordinated Entry (CE) queue formula where clients are selected in chronological order based on the date they respond to confirm a placement with a housing referral. The City ensures that all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those listed in [24 CFR 5.105\(a\)](#), are met when applying this preference through the established referral method.

REFERRAL METHOD

Referrals implementing the City of Boise's preference will be administered through OPH's Coordinated Entry System (CES) queue for selecting clients in chronological order based on the date they reach the top of the queue. In all instances, documentation of the status of homelessness will be implemented based on the standard practices for CES administration and PSH eligibility requirements.

Other non-chronically homeless households that meet one of the Qualifying Population definitions will be referred for treatment and wrap-around supportive services, if the queue no longer has referrals aligned with the City's established preference, through the CES using the City's housing crisis hotline, 211 system, or housing and services triage access points. The HOME-ARP service provider(s) must develop a waiting list from those referrals received from CES, documenting the date households presented for assistance through the City's housing crisis line, 211, or triage access points. The waiting list will be used to determine the first-come, first-served order for supportive services provided to other Qualifying Population households.

SUPPORTIVE SERVICES

HOME-ARP funds may be used to provide a broad range of supportive services to qualifying households. Supportive services include:

- a) services listed in section 401(29) of the McKinney-Vento Homeless Assistance Act ("McKinney-Vento Supportive Services")¹ (42 U.S.C. 11360(29));
- b) homelessness prevention services, as described in CPD 21-10 Section VI.D.3. and D.4; and
- c) housing counseling services, as described in CPD 21-10 Section VI.D.3(c).

ELIGIBLE SERVICES

Based on the Qualifying Population preference identified by the City's HOME-ARP Allocation Plan, the supportive services offered are intended to help the clients regain stability in their current housing or move into other permanent housing to achieve stability.

The City's HOME-ARP funds are used to provide intensive, wrap-around supportive services in a modified Assertive Community Treatment (ACT) model. For the purposes of service delivery, ACT means a multidisciplinary team - including a peer specialist with lived experience - who provide the treatment, rehabilitation, and support services needed to help clients reach their goals.

¹ The Consolidated Appropriations Act, 2021 (P.L. 116-260) enacted changes that renumbered section 401(27) to (29) of McKinney-Vento.

ACT services offer a client-centered, recovery-oriented mental health service delivery model that facilitates community living, psychosocial rehabilitation, and recovery for persons who have the most severe and persistent mental illnesses, have severe symptoms and impairments, and have not benefitted from traditional outpatient programs.

Frequency of resident interactions with ACT team members are individualized. Staff offer peer-organized social activities and educational groups based on resident preference and input. The services subscribe to the empirically verified principles of a Housing First, Trauma Informed, and Recovery focused model. ACT staff regularly interact with residents in their home and coach them through practical skills building around independent living and safety.

The subrecipient organization must have, and make available upon request, written standards for providing case management services and activities.

The clients are eligible to receive homelessness prevention services for the costs allowable in the HOME-ARP Implementation Notice (CPD-21-10) Section VI.D.4.c.i. (A – Q).

Limitations on Eligible Services

The City only reimburses the following Transportation service costs, as defined in CPD-21-10 Section VI.D.4.c.i (L):

- The costs of program participant's travel on public transportation to and from medical care, employment, childcare, or other services eligible under CPD-21-10 Section VI.D.4.c.i.
 - In the event that transportation is needed outside of public transit operating hours or service area, ride-sharing costs are considered eligible service delivery costs.
- Mileage allowance for subrecipient staff to visit program participants.

Ineligible Services

The City does not use HOME-ARP funds to pay for Financial Assistance costs (as described in CPD-21-10 Section VI.D.4.c.i (R) or Short-term and Medium-term Financial Assistance for Rent (as described in CPD-21-10 Section VI.D.4.c.i (S)).

SERVICE ELIGIBILITY

Qualifying Populations are eligible to receive supportive services funded through HOME-ARP for as long as they are residents within a permanent supportive housing project. For any qualifying populations referred for services that do not live in a permanent supportive housing project, the subrecipient must maintain documentation regarding the client's category of service eligibility (McKinney-Vento supportive services, homelessness prevention services, or Housing Counseling).

The subrecipient organization must also ensure that clients are only receiving the services needed and maintain client electronic health records indicating such, which could include case management plans and notes, peer support recovery assessment/treatment plans and visit notes, counseling assessments/treatment plans and notes, and nursing notes. There is no maximum dollar amount or time period that limits the services that can be provided to each client.

INCOME QUALIFICATION

All clients receiving services funded through HOME-ARP must have a household income at or below 80% Area Median Income (AMI) per the HOME “low-income” requirements. All income calculations to meet income criteria of a qualifying population or required for income determinations in HOME-ARP eligible activities must use the annual income definition in [24 CFR 5.609](#) in accordance with the requirements of [24 CFR 92.203](#).

DUPLICATION OF BENEFITS

The HOME-ARP subrecipient organization is responsible for ensuring that clients receiving eligible supportive services funded through HOME-ARP are not simultaneously receiving or approved to receive the same services from another program or provider. The subrecipient organization must use the HMIS database in coordination with other local service providers and information available through Our Path Home partner organizations.

TERMINATION OF ASSISTANCE

Clients in permanent supportive housing projects maintain their eligibility to receive services for the duration of their time as a tenant. It is expected that the subrecipient organization will be committed to helping residents retain housing, working closely with property management staff.

All other referred clients meeting the eligibility requirements of the qualifying populations maintain eligibility to receive assistance for as long as their household income does not exceed 80% AMI and they continue to meet the standard definitions of the qualifying population(s).

Permanent Supportive Housing project tenants who violate the conditions of the lease, which is monitored by a property management team that operates independently of supportive services, or who no longer need services (as identified by the subrecipient organization) may have assistance terminated.

Before assistance is terminated, the following process, recognizing the rights of individuals receiving assistance, will be followed:

1. The client will be provided a written copy of the program/project rules and the termination process before the client begins to receive assistance.
2. Clients will receive written notice containing a clear statement of the reasons for termination of their assistance.
3. Clients will have an opportunity to provide written or oral objection regarding the termination decision before a person other than the person who made the termination decision (or their subordinate).
4. Clients will receive prompt written notice of the final decision.

Throughout this process, the subrecipient organization must provide all communication in an accessible manner, in accordance with their established Language Assistance Plan, including providing reasonable accommodations as requested.

ELIGIBLE COSTS

All supportive services costs paid for by HOME-ARP must comply with the HOME-ARP Implementation Notice (CPD-21-10), as well as the Uniform Administrative Requirements in [2 CFR Part 200, Subpart E](#) (as amended) to ensure that costs are necessary and reasonable.

SUBRECIPIENT COSTS

The supportive services funded by the City's HOME-ARP allocation are provided by a subrecipient organization. That subrecipient enters into an agreement with the City that outlines a specific award amount, the services to be provided, related requirements, and timeframe during which funds are available.

The subrecipient requests reimbursement from the City for costs related to the delivery of supportive services in accordance with these guidelines and the subrecipient's written agreement with the City.

Project Delivery Costs

Project delivery costs must be attributable to the identifiable objective of the service delivered, otherwise they must be considered administrative costs.

The following are eligible project delivery costs:

- Salary and benefits packages of subrecipient staff who directly provide supportive services to clients.
- The costs of materials, supplies, and related expenses incurred by the subrecipient while directly providing supportive services to clients.

The subrecipient may request reimbursement for administrative costs incurred to facilitate the delivery of the supportive services program/project. Eligible administrative costs may include, but are not limited to, equipment, supplies, subscriptions, communications expenses, insurance, and professional services. Indirect costs will not be eligible for reimbursement.

All eligible costs for services provided may also be paid using HOME-ARP funds but must be associated with the services specifically identified in the HOME-ARP Implementation Notice (CPD-21-10) Section VI.D.4.c.i.(A-Q) and in accordance with the guidelines established in the Supportive Services section of these policies.

Administrative Costs

The subrecipient may request reimbursement for administrative costs incurred to facilitate the delivery of the supportive services program/project. Eligible administrative costs may include, but are not limited to, equipment, supplies, subscriptions, communications expenses, insurance, and professional services. Indirect costs will not be eligible for reimbursement.

REIMBURSEMENT PROCESS

The City reimburses the subrecipient organization for eligible expenses incurred on a monthly basis. Reimbursement requests, along with all supporting documentation, must be submitted in Neighborly by the 15th of the following month.

REPORTING & COMPLIANCE

REPORTING

The subrecipient must maintain household information for all clients assisted with HOME-ARP funds, in accordance with the Records section below. On a quarterly basis, the subrecipient must submit beneficiary data, along with other requested information, via the Neighborly Quarterly Report form. This report is due by the 15th day after the end of each fiscal year quarter.

The client data must include the number, size, and type of households assisted with supportive services, including each client's race, ethnicity, veteran, and marital status.

The City reserves the right to include additional narrative reporting questions in the Quarterly Report.

Following submission of the subrecipient's Quarterly Report, the City reports all beneficiary data for clients served in the preceding quarter in IDIS. The City's reporting is completed by the 30th day after the end of each fiscal year quarter.

Overall program performance and total numbers of beneficiaries served are reported in the City's Consolidated Annual Performance and Evaluation Report (CAPER), as required by HUD.

PROJECT COMPLETION

A HOME-ARP project is considered complete only after the final reimbursement request has been drawn-down in IDIS and all required reports have been submitted by the subrecipient organization.

MONITORING

The City monitors subrecipients in accordance with its established Monitoring Policies and Procedures. At a minimum, a Risk Analysis and desk-review of project and organizational records are completed annually. All subrecipient organizations must provide project-related documents upon request and accommodate an on-site monitoring as dictated by the Risk Analysis, established Monitoring procedures, or the Compliance Program Manager's discretion.

RECORDS

Consistent with the HOME-ARP Implementation Notice (CPD-21-10), the documents and information related to the HOME-ARP program and service delivery projects must be maintained in accordance with the City's HCD Record Retention Policy. The City's HCD Division maintains Program, Financial, and other federally required records related to HOME-ARP.

The subrecipient must maintain, and provide upon request, all Project Records for a minimum of five years after the termination of the written agreement's term.

Citizens, public agencies, and other interested parties will be provided with access to records upon request, consistent with applicable local and state laws and any other

applicable conditions from other federal grant programs regarding privacy and obligations of confidentiality.

Program Records

- a) Records evidencing that all HOME-ARP funds used for supportive services benefit individuals and households in qualifying populations.
- b) Records documenting compliance with the 15% limitation on administrative and planning costs.
- c) Confidentiality
 - i. PJ's written policies and procedures for maintaining confidentiality of qualifying households as individuals or families fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.
 - ii. PJ's written policies and procedures for maintaining confidentiality in compliance with the VAWA protections contained in 24 CFR Part 5, Subpart L.
- d) Records demonstrating compliance with the written agreements required by Section VIII.B of the Implementation Notice.
- e) Records demonstrating compliance with the applicable uniform administrative requirements required by Section VIII.D of the Implementation Notice.
- f) Records documenting required monitoring reviews, audits and the resolution of any findings or concerns.

Project Records

- a) A full description of each project assisted with HOME-ARP funds, including the location (address), form of HOME-ARP assistance, qualifying households assisted with HOME-ARP funds (subject to the confidentiality requirements in the Implementation Notice).
- b) The source and application of funds for each project, including supporting documentation in accordance with 2 CFR 200.302; and records to document the eligibility of project costs.
- c) Records (written agreements) demonstrating compliance with the Implementation Notice.
- d) Records demonstrating that each qualifying household is eligible for HOME-ARP assistance based on the requirements of ARP and Section IV of the Implementation Notice.
- e) Records demonstrating that each household qualifying as homeless meet the requirements in 24 CFR 576.500(b)(1), (2), (3), or (4), as applicable (except that youth aged 24 and under must not be required to provide third-party documentation to show they are homeless to receive any shelter, housing, or services for which ESG or CoC Program funds may be used to supplement the HOME-ARP assistance).
- f) Records demonstrating that each household qualifying as "at risk of homelessness," records that meet the requirements in 24 CFR 576.500(c)(1) or (2), as applicable, and include the following documentation of annual income:
 - i. Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and

- ii. Source documents for the assets held by the household and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
 - iii. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the household received over the most recent period for which representative data is available; or
 - iv. To the extent that source documents and third-party verification are unobtainable, the written certification by the household of the amount of income the household received for the most recent period representative of the income that the household is reasonably expected to receive over the 3-month period following the evaluation.
- g) For all HOME-ARP Supportive Services projects pursuant to McKinney-Vento or Homelessness Prevention Supportive Services:
- i. Records, where applicable, demonstrating compliance with the termination of assistance requirement as described in Section VI.D.5 of the Implementation Notice.
 - ii. Records of all solicitations of and agreements with subrecipients and contractors, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable including any findings and corrective actions required.
 - iii. Records of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR part 200, subpart D, as revised by Section D of the Implementation Notice.
 - iv. Records evidencing the use of the written procedures required under Section D.2 and records evidencing compliance with Section IV.C.2 of the Implementation Notice.
 - v. Records of all leases, subleases, and financial assistance agreements for the provision of rental payments, documentation of payments made by the PJ to owners, HOME-ARP sponsor, or qualifying households for the provision of financial assistance for rental payments, and supporting documentation for these payments, including dates of occupancy by qualifying individuals and families.
 - vi. Records that document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.
 - vii. Records of the types of services provided under the PJ's program and the amounts spent on these services.
 - viii. Records demonstrating subrecipient compliance with the recordkeeping requirements in Section VIII.F of the Implementation Notice.

Financial Records

- a) Records, in accordance with 2 CFR 200.302, identifying the source and application of HOME-ARP funds. Identification must include, as applicable, the Assistance Listing program title and number (formerly Catalogue of Federal Domestic Assistance), Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.
- b) Records concerning the HOME-ARP Investment Trust Fund Treasury account and local account required to be established and maintained by this Notice, including deposits, disbursements, balances, supporting documentation and any other information required by IDIS.
- c) Records identifying the source and application of program income and repayments.
- d) Records demonstrating adequate budget control and other records required by 2 CFR 200.302, including evidence of periodic account reconciliations.

Records Concerning other Federal Requirements

- a) Equal opportunity and fair housing records.
 - i. Data on the extent to which each racial and ethnic group, and single-headed households by gender of household head) have applied for, participated in, or benefited from, any program or activity funded in whole or in part with HOME-ARP funds.
 - ii. Documentation that the PJ submitted a certification that it will affirmatively further fair housing consistent with HUD's Interim Final Rule entitled Restoring Affirmatively Furthering Fair Housing Definitions and Certifications (86 FR 30779, June 10, 2021) (codified at 24 CFR 5.151 and 5.152;),
 - iii. Records demonstrating compliance with the nondiscrimination and equal opportunity requirements of 24 CFR 92, Subpart H.
- b) Affirmative marketing and MBE/WBE records.
 - i. Records demonstrating compliance with the affirmative marketing procedures and requirements of 24 CFR 92.351 and the Implementation Notice.
 - ii. Documentation and data on the steps taken to implement the jurisdiction's outreach programs to minority-owned (MBE) and female-owned (WBE) businesses including data indicating the racial/ethnic or gender character of each business entity receiving a contract or subcontract of \$25,000 or more paid, or to be paid, with HOME-ARP funds; the amount of the contract or subcontract, and documentation of participating jurisdiction's affirmative steps to assure that minority business and women's business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction, and services.
- c) Records demonstrating compliance with the environmental review requirements of 24 CFR 92.352 and 24 CFR part 58.
- d) Records demonstrating compliance with the lead-based paint requirements of 24 CFR part 35, subparts A, B, J, K, M, and R, as applicable.
- e) Records supporting compliance with conflict-of-interest requirements in 24 CFR 92.356.

- f) Records demonstrating compliance with debarment and suspension requirements in 2 CFR part 2424.
- g) Records concerning intergovernmental review, as required by 24 CFR 92.357.

CROSS-CUTTING FEDERAL REGULATIONS

Projects/programs receiving HOME-ARP funds are subject to compliance with additional cross-cutting federal regulations. The City monitors compliance with these regulations throughout the process of subrecipient selection, activity delivery, project closeout, and monitoring.

AFFIRMATIVE MARKETING & MINORITY OUTREACH

The requirements in 24 CFR 92.351 apply to HOME-ARP activities. The subrecipient organization must submit an Affirmative Marketing Plan to the City upon request. The affirmative marketing plan shall identify specific groups that are least likely to apply for housing and/or services (i.e., race, color, national origin, age, religion, gender, disability or other handicap, or familial status), and must include strategies to inform these groups of the housing or program opportunities offered by the Subrecipient.

CONDUCT AND CONFLICTS OF INTEREST

HOME-ARP is subject to the following conflicts of interest requirements:

Conflicts of Interest

PJs and subrecipients engaging in any of the activities defined this Notice shall be subject to the conflicts of interest provisions at 24 CFR 92.356, including but not limited to the conflicts of interest exception process defined in 24 CFR 92.356(d)-(e).

Organizational Conflicts of Interest

The provision of any type or amount of HOME-ARP supportive services may not be conditioned on an individual's or family's acceptance or occupancy of a shelter or housing unit owned by the PJ; State recipients; the subrecipient; or a parent, affiliate, or subsidiary of the subrecipient. All contractors of the PJ, State recipients, or subrecipient must comply with the same requirements that apply to subrecipients under this section.

Written Standards of Conduct

Subrecipients must maintain written standards of conduct covering the conflicts of interest and organizational conflicts of interest requirements under this Notice and 2 CFR 200.318.

Lobbying & Hatch Act

The subrecipient organization is prohibited from using any HOME-ARP funds to any person for the purpose of influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

The Subrecipient must also ensure that no funds provided, nor personnel employed with HOME-ARP funds shall be in any way or to any extent engaged in the conduct of political activities in violation of chapter 15 of Title V, U.S. Code.

ENVIRONMENTAL REVIEW

The environmental requirements in 24 CFR 92.352 apply to HOME-ARP activities and the environmental effects of each activity must be assessed in accordance with the provisions of NEPA and the related authorities listed in HUD's implementing regulations at 24 CFR part 58.

The PJ or "Responsible Entity" (RE) assumes responsibility for environmental review, decision making, and action for each activity that it carries out with HOME-ARP funds, in accordance with the requirements at 24 CFR Part 58.

No funds may be committed to a HOME-ARP activity or project before the completion of the environmental review and approval of the RROF/C, as applicable.

HOME-ARP supportive services as defined at 24 CFR 58.35(b) are categorically excluded, not subject to the Federal laws and authorities at 24 CFR 58.5 (CENST) or exempt from review under NEPA.

EQUAL ACCESS RULE

HUD's Equal Access Rule (77 FR 5661) requires equal access to HUD housing programs without regard to a person's actual or perceived sexual orientation, gender identity, or marital status. The Subrecipient must comply with this, and all related, rules in program implementation and project delivery.

FAIR HOUSING

The Fair Housing Act, 42 U.S.C. 3601 et seq., prohibits discrimination in housing and community development programs and activities because of race, color, religion, sex (including gender identity and sexual orientation), national origin, familial status, and disability.

These obligations extend to recipients of HUD financial assistance, including subrecipients, as well as the operations of state and local governments and their agencies, and certain private organizations operating housing and community development services, programs, or activities

LANGUAGE ACCESS PLAN

All subrecipient organizations must identify how information will be shared with those who do not speak English as a first language. The organization's plan must include how to meet the needs for physical, visual, and/or hearing impairment accommodation requests and how persons with limited English proficiency will be provided access to services.

LEAD-BASED PAINT

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing

regulations at 24 CFR Part 35, subparts A, B, J, K, M, and R apply to HOME-ARP-assisted activities.

NONDISCRIMINATION

The Subrecipient will not discriminate against any employee or applicant for services because of race, color, creed, religion, ancestry, national origin, gender, gender identity/expression, sexual orientation, disability or other handicap, age, marital status or status with regard to public assistance. The Subrecipient agrees to comply with the non-discrimination laws, regulations and executive orders referenced in 24 CFR 570.607, as revised by Executive Order 13279. The applicable non-discrimination provision in Section 109 of the Housing and Community Development Act (HCDA) remain applicable.

SECTION 504

The Subrecipient agrees to comply with federal regulations pursuant to compliance with Section 504 of the Rehabilitation Act of 1973 (29 USC 706), which prohibits discrimination against the handicapped in any federally assisted program. The City shall provide the Subrecipient with any guidelines necessary for compliance with that portion of the regulations in force during the term of the written agreement. Any client who would like to file a Section 504 grievance may find the procedures to do so at <https://www.cityofboise.org/departments/human-resources/ada-and-section-504/ada-and-section-504-grievance-procedure>

UNIFORM ADMINISTRATIVE REQUIREMENTS

All projects require conformance with 2 CFR 200 Subpart D, E, and F for administrative requirements, cost principles, and audit expectations.

URA

HOME-ARP funding is subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and section 104(d) of the Housing and Community Development Act of 1974, in addition to the Displacement, Relocation and Acquisition regulatory requirements of 24 CFR 92.353.

VAWA

Subrecipients must comply with the Violence Against Women Act (VAWA) requirements set forth in 24 CFR 92.359.