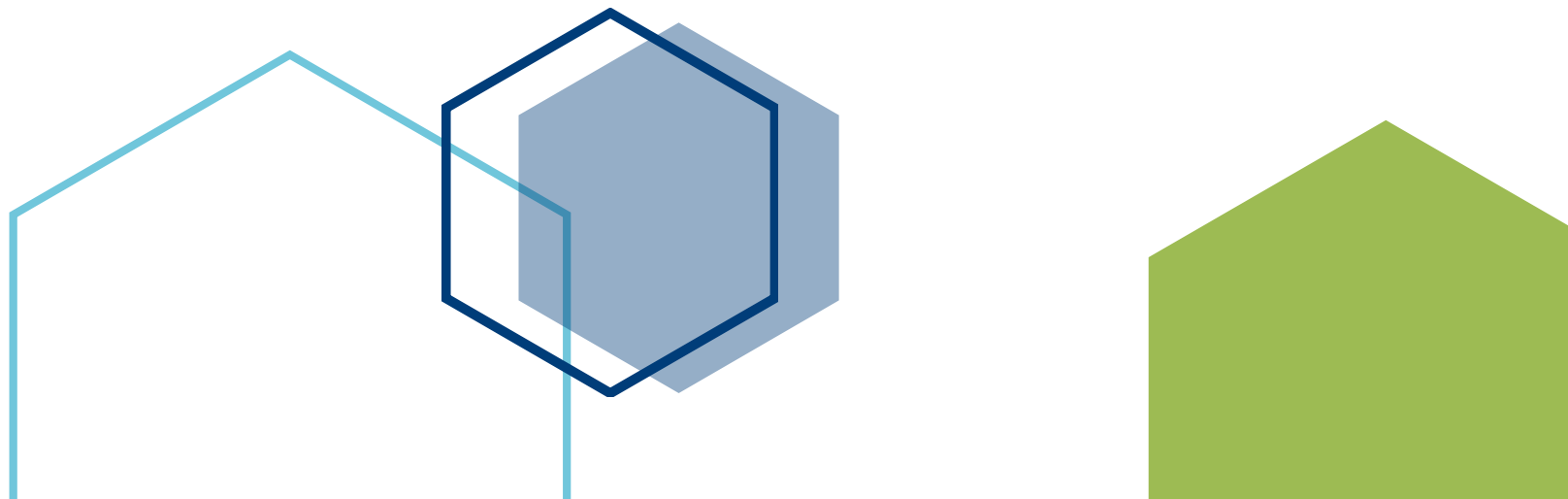




Barriers Fund Program Policy and Procedure Manual

Description: This document is intended to provide guidance to internal and external stakeholders that use the Texas Balance of State Continuum of Care (TX BoS CoC) Barriers Fund Program to prevent, prepare for, or respond to COVID-19. These policies and procedures detail a specific framework that can be considered in the administration of individual programs.



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1.2	Revision of the reallocation policy & addition of the county coverage area.	Anja Taylor, Barriers Fund Coordinator	08/05/2021

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1. INTRODUCTION

A. Introduction to the Program

The Coronavirus Aid, Relief, and Economic Security (CARES) Act, Public Law 116-36, was signed into law on March 27, 2020, providing \$1 billion in additional funds to the Community Services Block Grant (CSBG) program. The funds to states, territories, and tribes authorized under the CSBG Act are intended to address the consequences of increasing unemployment and economic disruption as a result of COVID-19. Through the Texas Department of Housing and Community Affairs (TDHCA), Texas Homeless Network was chosen as a recipient to receive and oversee approximately \$962,045 of CSBG Cares Act funding. Of these total dollars, \$489,970 will be used to establish a Barriers Fund Program that will serve low-income households across the Texas Balance of State Continuum of Care (TX BoS CoC) that are either homeless or at-risk of homelessness. For maximum impact, Texas Homeless Network will partner with nonprofit agencies across its service area to assist those directly affected by COVID-19.

Texas Homeless Network is grateful to Congress and the Texas delegation for the supplemental funds and entrusting us with the local management of these critical dollars. We understand that accountability matters, and thus Texas Homeless Network will ensure effective use of these funds and report all expenditures and provide clear outcomes to TDHCA throughout the duration of the contract term.

These policies and procedures are intended to provide guidance to internal and external stakeholders that use the TX BoS CoC Barriers Fund Program to prevent, prepare for, or respond to COVID-19. The intent is to provide a detailed description of the steps that shall be taken to determine client eligibility, calculate financial assistance, and provide services to those affected by COVID-19. Moreover, these policies and procedures detail a specific framework that can be considered in the administration of individual programs, and are intended to comply with Federal award requirements.

This manual shall address known issues of programmatic regulatory compliance required of a CSBG program as well as best practices, but should be regularly reconciled with CSBG State Rules for accuracy and compliance regulation.

i. Essential Project Elements

- The TX BoS CoC Barriers Fund Program shall be used as a “fund of last resort” and only be accessed when no other funding or resources are available in the community to ensure housing stability for people experiencing or at-risk of experiencing homelessness.
- CSBG-CV dollars shall be used only to prevent, prepare for, or respond to COVID-19.
- Eligible households affected by COVID-19 may receive assistance for basic needs and emergency services, such as utilities, medical costs, rent, transportation, food, and child or senior care.
- To be eligible for services, Texas households must earn no more than 200% of the Federal Poverty Level or 50% Area Median Income.

B. Access to Emergency Services

As described below, emergency services will be provided in Bandera, Brazoria, Cameron, Coke, Comal, Concho, Crockett, Denton, Frio, Gillespie, Gonzales, Guadalupe, Kendall, Kerr, Medina, Lubbock, Irion, Kimble, Menard, Reagan, Schleicher, Sterling, Sutton, Tom Green, Val Verde, and Wilson counties. County residents may access CSBG-CV emergency services at the respective agencies who operate a local Barriers Fund Program. Households requesting assistance must complete a client application, meet specific eligibility requirements as detailed below, provide required documentation, and sign all applicable program forms. When feasible, CSBG-CV funds shall be coordinated with other program and community resources to provide meaningful assistance to households.

C. Participation in the Barriers Fund Program

The TX BoS CoC Barriers Fund Program aims to empower low-income families and individuals who have been directly impacted by COVID-19. The fund is intended to be used as a “fund of last resort,” and is meant to be accessed when no other funding or resources are available in the community to ensure housing stability for people experiencing or at-risk of homelessness.

By accepting CSBG-CV funding, Texas Homeless Network has agreed to utilize funds specifically for the reduction of poverty, the revitalization of communities, and the empowerment of low-income families and individuals to become fully self-sufficient. The implementation of a successful program is critical in local efforts to prevent, prepare for, and respond to the coronavirus pandemic.

CSBG-CV subrecipients across the TX Bos CoC are held to the standards set forth in the [CSBG CARES Act Supplemental State Plan](#), the [CSBG Act](#), the [CARES Act](#), and the [Notice](#). It is the intention of the Texas Homeless Network to comply with the expectations outlined below.

All CSBG-CV subrecipients (agencies), current or future, must adhere to the following Essential Elements:

- Subrecipients shall participate in the Homeless Management Information System (HMIS) or other comparable software. Participation in HMIS is defined in the HMIS Policies and Procedures.
- Subrecipients must have utilized or attempted to utilize all applicable funds and resources, and be able to state that no other existing community resources can meet the specific need.
- Subrecipients must make payment directly to the vendor, submit proof of payment to Texas Homeless Network, and await reimbursement from Texas Homeless Network.
- Subrecipients shall be able to determine client eligibility by ensuring that individuals and/or households served by the Barriers Fund Program earn no more than 200% of the Federal Poverty Level. Calculation of income will be done under [24 CFR Part 5](#) instead of 10 TAC §6.4, as this is the method used by a preponderance of Texas Homeless Network and Continuum of Care funding recipients. For more information on income determination, please see section 3 of this manual.

- Subrecipients must have the ability to expend funds within the contract term, complete and file all required reports on time, and submit to monitoring to ensure programmatic compliance.

D. Program Components and Eligible Costs

CSBG CARES Act funding helps families and communities recover from the financial impact of the COVID-19 pandemic. Eligible families whose health or employment has been affected by COVID-19 may receive assistance for basic needs and emergency services, such as:

- Rental Assistance
- Utilities
- Medical Costs
- Transportation
- Food
- Case Management

To remain in compliance with all CSBG State Rules, it is imperative that program administrators and direct service staff are familiar with eligible costs of CSBG CARES Act funding.

For additional questions about Eligible Costs, please contact Anja Taylor, Barriers Fund Coordinator for Texas Homeless Network at anja@thn.org.

2. AGENCY ELIGIBILITY AND ONBOARDING

A. Agency Eligibility Determination

To be considered eligible for CSBG-CV funding, applicant organizations must meet the following threshold criteria:

- Agency must be a 501(c)3 nonprofit organization in operation for more than two years and must be providing services to people/households at-risk of homelessness or currently experiencing homelessness across the TX BoS CoC service area.
- Agency must be providing housing assistance, emergency shelter, or supportive services to persons/households who are at-risk of homelessness or experiencing literal homelessness as defined by [42 U.S. Code § 11302](#).
- Agency must be able to submit a Form 990 filed in the last Fiscal Year (FY).
- Agency must have a Data Universal Numbering System (DUNS) number and be registered with the System for Award Management (SAM) at the time of award.

- Agency must be currently using or plan to use a Homeless Management Information System (HMIS) or other comparable software.

i. Agency Eligibility Determination Procedure

CSBG-CV subrecipients will be selected for funding through a competitive Request for Application (RFA) process. Applications will be evaluated based on a scoring system set to be approved by the TX BoS CoC Board of Directors, Community Investment Committee, and additional Texas Homeless Network staff who are involved in the administration of this Federal award.

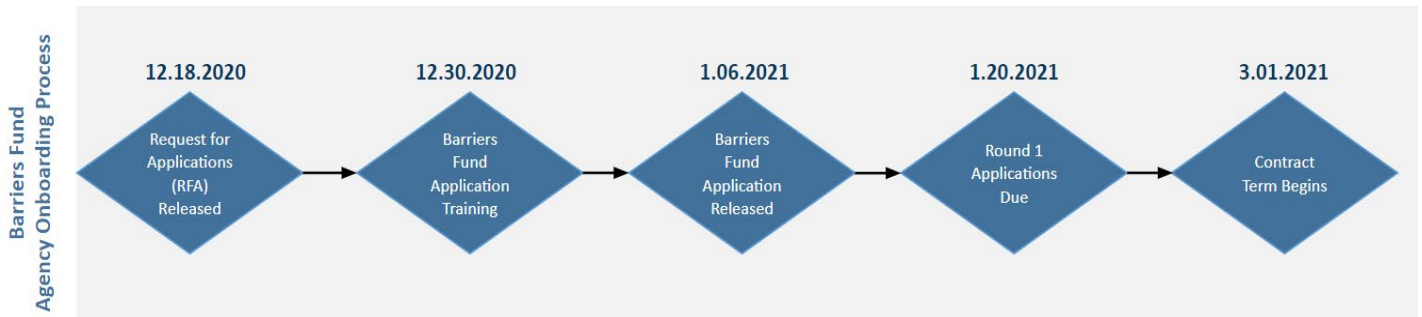
The application for the Barriers Fund Program is scheduled to be released on January 6, 2021. Prior to the release of the application, an RFA will be sent to communities across the TX BoS CoC. The RFA will include additional information on selection criteria, agency eligibility, and application instructions. Organizations will need to apply for funding through the SurveyMonkey Apply portal.

B. Agency Onboarding

Organizations receiving funds through the TX BoS CoC Barriers Fund Program will be required to complete an onboarding process with Texas Homeless Network. The purpose of the onboarding process is to train, educate, and assist CSBG-CV subrecipients (agencies) with all program rules and regulations.

For additional information on the agency onboarding process, please see the flow chart below.

i. Agency Onboarding Process



3. PROGRAM REQUIREMENTS

A. Documentation Standards

All expenditure records must be supported by appropriate source documentation. Source documentation must show costs charged were incurred during the effective period of the contract,

were actually paid out, expended on eligible costs, and approved by the responsible officials in the respective CSBG-CV subrecipient organization. Source documentation must explain the basis of the costs incurred, as well as show the actual dates and amount of expenditures. For example:

- With respect to rental assistance, expenditures must be supported by documentation such as mortgage statements or lease agreements that include the residents name, address, and amount due.
- With respect to the cost of utilities, expenditures must be supported by utility bills.
- With respect to other eligible costs, source documentation should include original receipts and invoices paid directly to vendors.

B. Documentation of COVID-19 Relief & Fund of Last Resort

In accordance with state rules and regulations, CSBG-CV funds shall only be used to prevent, prepare for, or respond to COVID-19. Thus, individuals and households who seek assistance through the Barriers Fund Program must be able to demonstrate that they have a COVID-19 related situation that has caused the need for assistance. Some examples of this include: job loss (laid off or furloughed), home or virtual school requiring students to be home which increased home expenses, COVID-19 related medical bills, or other situations related to the virus. The *COVID-19 Relief and Assistance Form* must be completed for every household that is assisted with CSBG-CV funds. The *COVID-19 Relief and Assistance Form* should be included in the client file along with the *Fund of Last Resort Form*. The *Fund of Last Resort Form* helps to ensure that the Barriers Fund Program is used as a “fund of last resort” and only accessed when no other funding or resources are available in the community to ensure housing stability for people experiencing or at-risk of homelessness.

C. Income Determination Eligibility

Under the CARES Act, CSBG-CV funds may be used to serve individuals and households whose income is at or below 200% of the Federal Poverty Guidelines: <https://aspe.hhs.gov/povertyguidelines>.

Individuals and households requesting service must be deemed eligible prior to receiving any temporary financial assistance. Per CARES Act and CSBG-CV guidelines, the household income must be at or below 200% of federal poverty for their household size.

Income documentation must be presented for every member of the household, 18 years old or older, who has earned or receives an eligible source of income (i.e., employment wages, cash payments, royalties, etc.). Documentation may be in the form of pay stubs, letters from employers, third party verification, unemployment confirmation letters or e-mails, and more. If a member of the household has been laid off or furloughed, they may present a copy of the correspondence from their employer stating such. Texas Homeless Network will provide income training to all subrecipients.

4. REGULATORY COMPLIANCE

A. Introduction to Regulatory Compliance

This section of the manual outlines the processes and strategies that Texas Homeless Network and all CSBG-CV subrecipients, current and future, will need to adhere to in order to remain in compliance with all contractual rules, regulations, and Federal award guidelines.

Texas Homeless Network will provide support to CSBG-CV subrecipients in need of help creating effective organizational policies that meet the requirements of sections B through F.

For additional questions about regulatory compliance, please contact Anja Taylor at anja@thn.org.

B. Prevention of Trafficking

Texas Homeless Network and all future CSBG-CV subrecipients, current or future, must comply with Section 106(g) of the Trafficking Victims Protection Act of 2000, as amended (22 U.S.C. §7104 et seq.).

C. Prevention of Waste, Fraud, and Abuse

Texas Homeless Network and all CSBG-CV subrecipients, current or future, shall establish, maintain, and utilize systems and procedures to prevent, detect, and correct waste, fraud, and abuse in activities funded by the Barriers Fund Program. The systems and procedures shall address possible waste, fraud, and abuse by Texas Homeless Network, its employees, clients, vendors, and administering agencies. Texas Homeless Network's internal controls systems and all transactions and other significant events are to be clearly documented, and the documentation is to be readily available for monitoring by TDHCA.

Texas Homeless Network shall give TDHCA complete access to all of its records, employees, and agents for the purpose of monitoring or investigating the CSBG program. Texas Homeless Network shall immediately notify TDHCA of any discovery of waste, fraud, or abuse. Texas Homeless Network shall fully cooperate with TDHCA's efforts to detect, investigate, and prevent waste, fraud, and abuse.

Texas Homeless Network and all CSBG-CV subrecipients shall not discriminate against any employee or other person who reports a violation of the terms of the CSBG CARES service contract, or of any law or regulation, to TDHCA or to any appropriate law enforcement authority, if the report is made in good faith.

D. Non-Discrimination, Equal Opportunity, Accessibility

NON-DISCRIMINATION. A person shall not be excluded from participation in, be denied the benefits of, be subjected to discrimination under, or be denied employment in the administration of or in connection with any program or activity funded in whole or in part with funds made available under the

CSBG CARES service contract, on the grounds of race, color, religion, sex, familial status, national origin, age, disability, political affiliation, marital status or belief.

CSBG-CV subrecipients must comply with the non-discrimination and equal opportunity provisions of Federal civil rights laws, including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Title II of the Americans with Disabilities Act prohibits public entities from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing and housing-related services such as housing search and referral assistance;
- Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

EQUAL OPPORTUNITY. Texas Homeless Network and all CSBG-CV subrecipients, current and future, agree to carry out an Equal Employment Opportunity Program in keeping with the principles as provided in President's Executive Order 11246 of September 24, 1965, as amended, and its implementing regulations at 41 CFR Part 60.

ACCESSIBILITY. Texas Homeless Network and all CSBG-CV subrecipients, current and future, must meet the standards under (i) Section 504 of the Rehabilitation Act of 1973 (5 U.S.C. §794) Titles II and III of the Americans with Disabilities Act (42 U.S.C. §§12131-12189; 47 U.S.C. §§155, 201, 218 and 255) as implemented by U. S. Department of Justice at 28 CFR Parts 35 and 36.

Texas Homeless Network and all future CSBG-CV subrecipients shall operate each program or activity receiving financial assistance so that the program or activity, when viewed in its entirety, is readily accessible and usable by individuals with disabilities. Texas Homeless Network and all future CSBG-CV subrecipients are also required to provide reasonable accommodations for persons with disabilities.

E. Conflict of Interest/Nepotism

Texas Homeless Network and all CSBG-CV subrecipients shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. Failure to maintain written standards of conduct and to follow and enforce the written standards is a condition of default under the CSBG CARES service contract. In addition, the written standards must meet the requirements in 2 CFR §200.318.

No employee, officer, or agent of Texas Homeless Network shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the Parties indicated herein, has a financial or other interest in the firm selected for an award. This also applies to the procurement of goods and services under 24 CFR §§200.317 and 200.3186.

The officers, employees, and agents of Texas Homeless Network shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. Texas Homeless Network may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of Texas Homeless Network.

Failure to maintain written standards of conduct and to follow and enforce the written standards is a condition of default under the CSBG CARES service contract and may result in termination of the contract or de-obligation of funds.

F. Political Activity and Legislative Influence

None of the funds provided under the CSBG CARES service contract shall be used for influencing the outcome of any election, or the passage or defeat of any legislative measure. This prohibition shall not be construed to prevent any state official or employee from furnishing to any member of its governing body upon request, or to any other local or state official or employee or to any citizen, information in the hands of the employee or official not considered under law to be confidential information.

No funds provided under the CSBG CARES service contract may be used directly or indirectly to hire employees or in any other way fund or support candidates for the legislative, executive, or judicial branches of government, the State of Texas, or the government of the United States.

None of the funds provided under the CSBG CARES service contract shall be used to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award governed by the Byrd Anti-Lobbying Amendment (31 U.S.C. §1352) as the Development Owner and each of its tiers have certified by their execution of the “Certification Regarding Lobbying for Contracts, Grants, Loans, and Cooperative Agreements” included in the CSBG CARES contract.

5. REPORTING AND PERFORMANCE

A. HMIS

A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. All CSBG-CV subrecipients, current or future, must keep records of client participation in HMIS or a comparable database.

Texas Homeless Network will provide HMIS related training to all new and current users as part of the agency onboarding process.

B. Monthly Expenditure Reports

All CSBG-CV subrecipients are able to receive reimbursement for funds used to provide eligible emergency services. Funding is conditional on compliance with the program requirements and the responsibilities as outlined in the service contract. The service contract only permits reimbursements to an organization for the expenditures specifically covered by the budget summary exhibit.

Payment of funds will be paid for reimbursement of expenditures. Payments will not be made to advance funds. This means that even with an allocation of funds and an active contract, your organization will not actually receive the funds prior to an expenditure on your part.

- Funds will be paid on a reimbursement basis to an organization within 30 days after receipt of all the required supporting documentation of eligible expenses.

Support documentation for expenditures must be uploaded to the corresponding client file in HMIS. Examples of source documents include:

- Mortgage statements or lease agreements that include the residents name, address, and amount due.
- Proof of Payment - Copies of Checks - check for utility and rental assistance, payment of benefit services, or other purchases.

Expenditure reports should be submitted no later than the 5th of each month. This will provide for a timely reimbursement by Texas Homeless Network.

- **Important Note:** Significant reimbursement delays may occur from missing or incorrect program reports, expenditure source documentation or required signatures.

Texas Homeless Network reserves the right to hold or return reimbursement requests and withhold payments until all required reports, statements, certificates, monitoring items or other documentation have been submitted and approved.

C. Grant Close Out

This section is designed to help CSBG-CV subrecipients, current or future, to understand the process for ending a CSBG-CV funded agreement with respect to:

- General issues that must be addressed
- Specific closeout procedures typically undertaken by subrecipients and,
- Continuing subrecipient responsibilities

The closeout of a contract is the process by which the grantee (Texas Homeless Network) determines all required work has been completed. All financial, administrative and performance issues must be resolved to the satisfaction of both the CSBG-CV subrecipient (agency) and the grantee. Final reporting and documentation must be submitted and satisfied within 14 working days following the close of the contract term.

Close-out procedures will begin on May 30, 2022. The following is a general listing of steps for program closeout:

- Submission of a copy of the most recent annual agency budget, audit and year-end beneficiary report.
- Submission of the required standard documentation including:
 - final request for reimbursement;
 - financial reports;
 - performance and beneficiary reports.

6. MONITORING AND QUALITY CONTROL

A. Monitoring

The overall purpose of monitoring and evaluation is to:

- Ensure the appropriate use of Federal awards;
- Document that funds are spent effectively to accomplish the intended purpose of the program;

- Verify funds are used in accordance with the terms of the grant award;
- Measure and track performance outcomes and other project benchmarks;
- Review information and provide technical assistance as needed.

Texas Homeless Network utilizes several methods to monitor subrecipient performance and contract compliance. These include: **desk monitoring** evaluation of monthly documents submitted including monthly reports, requests for reimbursement, financials; **informal monitoring** involving routine record requests by email, phone, and letter; **formal monitoring** evaluation involving telephone interviews, required meetings and quarterly virtual or onsite monitoring evaluation visits with all CSBG-CV subrecipients.

Monitoring and evaluation activities ensure adherence to the contract and reporting requirements, as well as to other provisions in the contract. Full cooperation is expected in the development, implementation and maintenance of record-keeping systems and provision of data determined to be necessary to effectively monitor and evaluate the program activities.

B. TX BoS CoC Barriers Fund Program Reallocation of Funding Policy

The purpose of the TX BoS CoC Barriers Fund Program Permanent Reallocation of Funding for Chronic Underspending Policy (“Policy”) is to provide a set of rules that govern the process for reallocating CSBG-CV program funds due to chronic underspending related to a local Barriers Fund Program project. The Community Investment Committee will be responsible for determining how and if the underspent project funds will be reallocated. Any reallocation made under this Policy is permanent.

Unspent project funds from the 2020 Community Services Block Grant Program State Discretionary Funds and CARES Act Contract Number **61200003361** will need to be returned to the Department upon the contract expiration date. Texas Homeless Network seeks to maximize its funding by keeping as much of the funding as possible across its Service Area.

CSBG-CV subrecipients that are determined to have chronic underspending as of the measurement dates (October 5, 2021, January 5, 2021 and April 5, 2021) will be subject to reallocation. Texas Homeless Network will notify all projects with chronic underspending of its intent to reallocate (and the amount of reallocation – see below) within 15 days of the measurement date.

The reallocation schedule is as follows:

- Quarter 2: By the end of the second quarter (September 30, 2021), subrecipients are expected to expend at least 43% of their total award under the CSBG-CV service contract.
- Quarter 3: By the end of the third quarter (December 31, 2021), subrecipients are expected to expend at least 65% of their total award under the CSBG-CV service contract.

- Quarter 4: By the end of the fourth quarter (March 31, 2021), subrecipients are expected to expend at least 85% of their total award under the CSBG-CV service contract.

If a CSBG-CV subrecipient has its grant amount reduced as a result of this Policy, the project budget must be adjusted by the subrecipient at the time of the reallocation notice. If the recipient does not provide an adjusted budget, each budget line item for the project will be reduced in proportion to the adjustment amount.

7. RECORD KEEPING REQUIREMENTS

A. Open Records

Texas Homeless Network acknowledges that all information collected, assembled, or maintained for the Barriers Fund Program, except records made confidential by law, is subject to the Texas Public Information Act (Chapter 552 of Texas Government Code) and must provide citizens, public agencies, and other interested parties with reasonable access to all records pertaining to this contract subject to and in accordance with the Texas Public Information Act.

All CSBG-CV subrecipients, current or future, must adhere to the Texas Public Information Act as it relates to the Barriers Fund Program.

B. Access to Records

As a CSBG-funded agency, Texas Homeless Network shall give the Department of Health and Human Services, the United States General Accounting Office, the Texas Comptroller, the State's Auditor's Office, and the Texas Department of Housing and Community Affairs (TDHCA), or any of their duly authorized representatives access to and the right to examine and copy, on or off the premises of the Texas Homeless Network location, all records pertaining to the CSBG-CV contract. Such right to access shall continue as long as the records are retained by Texas Homeless Network. Texas Homeless Network also agrees to cooperate with any records examination conducted pursuant to this records policy.

All future CSBG-CV subrecipients, current or future, must make available records that have been collected, assembled, or maintained for the Barriers Fund Program and its beneficiaries.

C. Record Retention

CSBG-CV subrecipients must maintain administrative records, financial records, and beneficiary records as necessary for Texas Homeless Network to audit and monitor organization performance. CSBG-CV subrecipient records must be available to examine, make excerpts and copies, and to conduct audits of all agreements, invoices, materials, payrolls, personnel records, and all other data requested by the

Department of Health and Human Services, TDHCA, Texas Homeless Network, or its designated representatives.

Records including all books, documents, reports, and written accounting procedures pertaining to the operation of programs and expenditures of CSBG-CV funds must be retained for five years.