Indiana Housing First Program
Compliance Requirements Policy
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Section 1: Background

This is the Indiana Housing First Program Compliance Requirements Policy ("Policy") which governs the Indiana Housing First Program ("the Program"). The Program was established in 2017 to provide rental assistance and supportive services to individuals and families with a serious, persistent mental illness, a chronic chemical addiction, or a serious and persistent mental illness with a co-occurring chronic chemical addiction, who are also facing a housing crisis, exiting a residential treatment program, or could exit a residential treatment program with access to affordable housing and supportive services. Program regulations may be found in Indiana Code 5-20-9.

Section 2: Strategy

The Program provides rental assistance and supportive services to individuals and families with serious mental illness and/or chronic chemical addiction who are also facing a housing crisis (as defined in Section 4.1 below). The Program uses a housing first model, meaning that services provided are voluntarily selected by Program participants and are predicated on a harm reduction approach to addiction, rather than mandating abstinence. Rental assistance provided under this Program may not exceed 24 months, with the goal of increasing self-sufficiency and building support networks so assistance does not last longer than is necessary.

2.1 Housing First

Housing First is an approach to quickly and successfully connect individuals and families experiencing a housing crisis to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.¹

2.2 Critical Time Intervention

The Program follows a Critical Time Intervention ("CTI") approach to providing assistance. CTI is an evidence-based practice that has been demonstrated to be effective at providing housing assistance to individuals with serious mental illness.² In addition, the approach is recognized by the Substance Abuse and Mental Health Services Administration ("SAMHSA") in the National Registry of Evidence-based Programs and Practices.³

The goal of CTI is to build long-lasting stability and increase the impact of assistance provided by developing a community support network around the individual or household, and by providing support during the time of transition. The supports established are expected to last long after the financial assistance and relationship with the case manager are terminated. CTI is typically split into three phases (Table 1), with each phase typically expected to last two to three months. In practice, an individual may need a longer or shorter duration of assistance, and a case manager should discuss progress with a client to determine when it is appropriate to move to the next phase. CTI case

¹ https://www.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf
³ https://nrepp.samhsa.gov/ProgramProfile.aspx?id=1278
managers typically have small caseloads of approximately 15 clients.

<table>
<thead>
<tr>
<th>Transition</th>
<th>Try Out</th>
<th>Transfer of Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-3 Months</td>
<td>4-6 Months</td>
<td>7-9 Months</td>
</tr>
<tr>
<td>• Case manager provides special support to client</td>
<td>• Case manager evaluates operation of support network</td>
<td>• Case manager monitors connections to community support network</td>
</tr>
<tr>
<td>• Case manager makes connections to community providers and services</td>
<td>• Case manager makes adjustments and changes as necessary</td>
<td>• Case manager develops plan with client for long-term goals and begins to set that plan in motion</td>
</tr>
<tr>
<td>• Client meets with providers and starts to build a community support network</td>
<td>• Case manager still meets with client regularly, but less frequently</td>
<td>• Project ends support once community support networks are safely in place</td>
</tr>
<tr>
<td>• Case manager makes frequent home visits</td>
<td></td>
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<tr>
<td>• Case manager accompanies client to appointments</td>
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</tr>
</tbody>
</table>

Table 1 CTI Phases

A high fidelity CTI Model utilizes a team approach with a minimum of three people on the team. The minimum essential roles of the team are listed below and briefly summarized.

1. **Fieldwork Coordinator**: is responsible for supporting the CTI worker(s) in the field and setting up good communication between workers and the clinical supervisor, facilitates weekly caseload meeting, knows the caseloads of each CTI worker and ensures progress notes are up to date, and may hold a partial caseload.

2. **CTI Worker (case manager)**: is the primary contact and helps individuals assess needs, identify and strengthen community connections, monitors community support network and mediates when necessary. The CTI worker is also responsible for phase planning and holds a small case load.

3. **Clinical Supervisor**: holds a clinical degree and is therefore able to provide a clinical perspective, supports the collaboration between client, CTI worker, and community, keeps the morale of the team high and provides a supportive environment for team. May hold a caseload. The Clinical Supervisor is ultimately responsible for monitoring fidelity to the CTI Model.

In depth CTI training opportunities will be offered by IHCDA throughout the grant year and will be required for any agencies and staff that have not yet had CTI training. Some trainings may be required for all agencies, regardless of former training or experience.

### 2.3 Grant Amount

An eligible applicant (as defined in Section 3 below) may request up to $300,000, but no less than $100,000, in funding in the form of a grant from the Indiana Housing and Community Development Authority ("IHCDA") under the Program. Recipients will be selected through a competitive Request

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Section 3: Eligible Applicants

Eligible applicants are nonprofit corporations recognized as tax exempt under Section 501(c)(3) of the U.S. Internal Revenue Code, public housing agencies, or units of local government. Each applicant that is awarded funding under the Program may award portion(s) of its awards to one or more sub-grantees to carry out eligible Program activities. The types of eligible sub-grantees are represented in the list below. If an applicant designates a sub-grantee responsible for any eligible Program activity, the applicant still holds responsibility for ensuring that those activities are carried out and comply with all relevant policies and laws.

In order to deliver comprehensive services and to build community support networks, applicants are encouraged to have formal and informal relationships with the following organizations:

- Nonprofit or faith based organizations providing services to individuals and families in the Program's target population.
- Units of local government.
- School corporations and schools.
- Businesses.
- Public housing agencies.
- Social service providers.
- Mental health providers.
- Hospitals.
- Affordable housing developers and providers.
- Law enforcement agencies and correctional facilities.
- Organizations serving homeless veterans.
- Organizations serving victims of domestic violence.
- Universities.
- Other public or private entities IHCDA considers appropriate to partner with to accomplish the purposes of the Program.

Priority will be given to applicants who have experience administering rental assistance programs. Any current Indiana Housing First recipient must be in compliance with the benchmarks and requirements in its award agreement in order to request an additional Housing First Award.

Section 4: Participant Eligibility & Selection Plan

4.1 Participant Eligibility

Eligible person: An individual with a serious mental illness, a chronic chemical addiction, or a serious and persistent mental illness with a co-occurring chronic chemical addiction, resulting in a housing crisis as defined below.

Households that contain at least one member with a serious mental illness and/or a chronic chemical addiction meet the eligibility requirements so long as all household members are
experiencing a housing crisis. The recipient must document the eligibility by having third party documentation from a knowledgeable third-party to verify that one of the above diagnoses applies. HUD’s disability verification form may be used as documentation. The recipient must not keep detailed medical records or information about the specific disability in the client file.

For the purposes of this Program, **Housing Crisis** is defined as a situation in which a household does not have sufficient resources or support networks immediately available to maintain safe and affordable housing or to prevent the individual or household from requiring emergency housing. A household will be determined to be in a housing crisis if they meet one of the following conditions:

- They are residing on the street or a place not meant for human habitation;
- They are residing in temporary housing, including emergency shelter, transitional housing, or are currently staying with family or friends on a temporary basis and must imminently vacate;
- They are facing an imminent court-ordered eviction. A household served under this definition is only eligible for a one time arrears payment to prevent the eviction and prevent homelessness, but can be served with ongoing services.
- They are exiting a residential treatment program and do not have immediate access to permanent housing; or
- They are living in an institution or other restrictive setting and could, with stable and affordable housing provided by this Program, along with community and home based supports, live independently in the community.

The recipient must use the Housing Crisis Verification form provided by IHCDA to document the Housing Crisis status.

### 4.2 Participant Selection Plan & Prioritization

In addition to meeting the eligibility definitions above, recipients must prioritize serving eligible persons who are medically vulnerable and either immediately lacking housing resources or who must immediately exit a residential treatment program. As part of their request for funds, an applicant must define how it will prioritize medically vulnerable households. IHCDA will work with award recipients to finalize and approve their process for identifying and selecting Program participants.

### Section 5: Eligible and Ineligible Costs

Program funds may be used to pay for rental assistance and associated housing costs, and certain supportive services for eligible individuals. Administrative costs are also available for administering services pursuant to the Program. Households are not required to receive rental assistance in order to receive supportive services. Rental assistance provided by the Program must be tenant-based, meaning the assistance must be tied to the client, and not to a specific unit or project. Recipients must assist the program participant/household in locating housing, but cannot require a household to live in a particular apartment complex, project, building, or unit. Households may choose to rent units owned by the recipient, so long as the recipient does not require households to do so and provides household with other available options. The recipient must consider the long term affordability of housing for the tenant when assisting the tenant in selecting available units.

Program participants receiving rental assistance must execute a lease with the property owner. Lease
terms must not be overly burdensome on the program participant. Initial lease terms must be for no less than 12 months, and leases must be renewable.

Supportive services must be offered to assisted households, but participation in those services cannot be required. If a household chooses not to engage in any supportive services at the time of enrollment, the recipient must offer services at least monthly throughout the duration of the time that the individual/household receives assistance. Programs must operate on a harm reduction approach to addiction, rather than abstinence, while supporting a Program participant’s commitment to recovery. Regardless of service participation, Program participants must meet with a case manager at least monthly. Supportive services cannot exceed 20% of the total grant.

5.1 Rental Assistance
At least 70% of the overall grant amount must be used for rental payments and other eligible housing costs as defined below:

Rental Payments
- Rent payments and other housing costs must be paid by the recipient directly to a third-party on behalf of the household. The contract rent (charged by the landlord) plus a utility allowance (if utilities are not included in the rent) must be determined to be reasonable. The recipient must use Go Section 8 to search for comparable units to determine if the rent plus utility allowance is reasonable.
- The household must pay at least 30% of their monthly adjusted income. The program can pay the rest of the rent depending on the subsidy model that the recipient has chosen (see Section 7.6 below).
- Rental payments must be paid one month at a time. Prorated rents and rental arrears payments may be included with the first month’s rent.
  - Rental payments are limited to 24 months per household per episode of housing crisis. Any household receiving more than 12 months of assistance must be recertified as eligible to receive additional assistance. See Sections 7.4 and 7.5 below for additional information.
  - The amount of rent paid by the household is determined using the methodology described in Section 7.6 below.
- Monthly rental payments and first and last months’ rent if required by owner.
- Security deposits of up to the value of two months of rent.
- Up to three months of rental arrears and associated late fees may be paid if this payment is necessary for the household to obtain or maintain permanent housing.
- If the arrears are paid, the amount of the arrearage must be taken into account when determining the total number of months of rental assistance that the household is eligible to receive.
- Utilities which are included in the rent.

Other Eligible Housing Costs
- Up to three months of utility arrears, if this payment is necessary for the household to obtain or maintain utilities in a unit for which they are receiving rental assistance. If the arrears are paid, the amount of the arrearage must be taken into account when determining the total number of months of rental assistance that the household is eligible to receive.
- Utility deposits and ongoing utility payments (not to exceed the IHCDA published utility allowance for the county) for households receiving rental assistance. The recipient may not
pay utilities if the Program participant is receiving utility assistance from another source.

• Application fees or background checks required by the property owner to obtain housing.
• One-time moving fees.

5.2 Supportive Services

Supportive services funds may not exceed 20% of the overall grant amount.

• Employment assistance and job training.
• Substance abuse and addiction treatment.
• Educational assistance.
• Life skills assistance.
• Treatment for, and the management of, mental and physical health problems.
• Developing individualized housing and service plans.
• Transportation assistance.
• Assessment of service needs.
• Legal services.
• Child care assistance.
• Provide housing stability case management services.
• Developing plans, making referrals, or connecting to the types of services listed above.

5.3 Administrative Costs

Up to 10% of the total grant amount may be used for administrative costs.

• Processing claims.
• Supervision of Program staff.
• Reporting, including HMIS costs (see section 7.1).
• Conducting Housing Quality Standards (HQS) assessment.
• Housing search.
• Mediation with property owners and/or landlords.
• Determining participant eligibility.

5.4 Ineligible Costs

• Mortgage assistance, utility payments for homeowners, other costs related to homeownership.
• Lot rent for mobile home or RV.
• Rent or utility assistance for households receiving other housing subsidy.
• Hotel/motel payments.
• Phone, cable, satellite, or internet deposits or services.
• Monthly utility payments for households not receiving rental assistance.
• Renter’s insurance
• Furniture and other household items
• Any other costs not listed in this document without specific written permission from IHCDA.
Section 6: Claims Process

Funds are disbursed on a reimbursement basis through claims submitted online at https://ihcdaonline.com/. Recipients must submit claims to IHCDA at least once per month. For information on how to submit a claim and the required documentation, refer to the IHCDA Claim Submission Manual. Questions regarding the claims process and access to the system should be submitted to claims@ihcda.in.gov. If the question is on eligible activities, please contact the Housing First Program Manager.

Required claim documentation:
- Signed Claim Receipt Page(s)-signed by authorized signatory
- Claim Summary Pages
- Other Support Documentation including:
  - General Ledger
  - Invoices/receipts (showing date paid)
  - Financial Narrative Reimbursement Form (provided by IHCDA)

Section 7: Compliance and Reporting

7.1 Homeless Management Information System
Data regarding all homeless individuals assisted with the Program’s grant funds must be entered into either the Indiana Balance of State or the Indianapolis Homeless Management Information System (HMIS). IHCDA will determine the HMIS that the recipient must use based on the geographic location of the project.

7.2 Monthly and Closeout Reports
The recipient must submit all reports as requested by IHCDA. Recipients must submit a monthly report identifying all households served and funds expended. The monthly report must be submitted by the 15th of each month, for the required information about the previous month. A final closeout report must be submitted to IHCDA within 30 days after the award expires.

7.3 Housing Quality Standards (HQS)
IHCDA will adopt the Housing Choice Voucher (“HCV”) program quality standards for the Program. HCV regulations at 24 CFR Part 982 set forth basic housing quality standards (“HQS”) which all units must meet before assistance can be paid on behalf of a family and at least annually throughout the term of the assisted tenancy. HQS define "standard housing" and establish the minimum criteria for the health and safety of Program participants. Current HQS regulations consist of 13 key aspects of housing quality, performance requirements, and acceptability criteria to meet each performance requirement. HQS includes requirements for all housing types, including single and multi-family dwelling units, as well as specific requirements for special housing types such as manufactured homes, congregate housing, single room occupancy, shared housing, and group residences.

All recipients will be required to conduct an HQS inspection of the unit before allowing the
beneficiary to move-in. IHCDA will provide additional guidance to recipients on how to conduct an HQS inspection. Recipients may not perform HQS inspections on units they own, or any unit for which the recipient has a financial interest. If a participant chooses to rent a unit owned by the recipient, the recipient should contact IHCDA for further guidance.

7.4 Income Limits
Participants do not have to income qualify at initial enrollment. Rather, initial Program eligibility is based solely on meeting the definition of “eligible person” and “housing crisis” as described in Section 4.1 above. However, income must still be calculated in order to determine the participant’s rent contribution.

In addition, to receive rental assistance for more than 12 months, the participant household’s income must be certified (in accordance with the Section 8 Methodology per 24 CFR 5.609 and 24 CFR 5.611(a)) as having an annual income at or below 30% of the area median income (AMI) as published annually by HUD. This income certification must be conducted no more than 120 days prior to the end of the first year of assistance to determine eligibility for a second year of assistance. Under no circumstances shall the rental assistance for a household extend beyond 24 months.

Recipients may not establish a minimum income requirement for the Program, and must accept households with little or no income.

7.5 Recertification
Recipients must document recertification of Program participant eligibility at least once annually if the assisted household is going to receive more than 12 months of rental assistance. The recertification must establish that:

- The Program participant’s annual income does not exceed 30% of the AMI as published by HUD, using the Section 8 methodology of calculating and verifying income.
- The Program participant does not have sufficient resources or support networks immediately available to maintain safe and affordable housing or to prevent the individual or household from requiring emergency housing.
- The Program participant household has at least one member with a serious and persistent mental illness and/or a chronic chemical addiction.

If households are determined ineligible at recertification, they may continue to receive rental assistance for one month, and may continue to receive case management for an additional three months following the date of determination of ineligibility to support the household’s transition to long-term stability.

7.6 Participant Rent Contribution
Recipients must evaluate a Program participant’s income at initial enrollment, at recertification, and anytime there is an increase or decrease in household income. The participant’s rent contribution must be at least 30% of the household’s monthly adjusted income (adjustment factors include the number of people in the family, the age of family members, medical expenses, and child-care expenses). Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Income should be recalculated whenever there is a change in the household’s status (family size, employment, etc.) that would lead to an increase or decrease in income.

While Program participants must pay a portion of their income as rent, the nature of this Program
allows for flexibility in calculating the amount the participant will pay. It may be unrealistic for a household to make the necessary increases in income before assistance ends for the household to pay their full monthly rent with only 30% of their income. Therefore, recipients may require the participant to pay an amount above 30% of their income, so long as that amount:

- Is based on a percentage of the household’s income, not a specific dollar amount.
- Is reasonable for the household to pay and still meet basic needs.
- Is conducive to the recovery and long-term stability of the household.
- Takes into consideration any utilities, medical costs, education costs, childcare costs, or other reasonable reoccurring fees that the household pays.

Participant rent contribution may change as income changes, or over time as the participant moves through the Program. Changes in rent contributions should be reasonable and take into account all of the factors listed above. Additionally, if a participant’s income decreases, the participant’s rent contribution should decrease to reflect this change in status, as long as the decrease does not go below 30% of the participant’s monthly income. The method used to calculate the participant rent may vary by household. IHCDA requires the recipient to document the determined structure for each household and document when the standard is deviated from. In addition, if certain exceptions to the determined structure are made for one household, the same exceptions must be considered for all households in similar circumstances.

Rental subsidy examples
IHCDA encourages recipients to work with individual households to identify the financial resources needed to assist in returning to housing as quickly as possible. Recipients should be transparent and realistic when working with households to identify what financial assistance is available. Examples of subsidy models include gradually decreasing the amount of subsidy the household receives over the course of rental assistance or requiring the household to pay an increasing percentage of income the longer they receive the subsidy. It is recommended that recipients establish an initial period of assistance and revisit the potential for extension based on household needs as the subsidy limit is reached.

**Subsidy Model Examples:** Below are common models used to establish subsidy guidelines. Recipients can adjust model amounts or percentages based on the individual needs of households.

**Decreased subsidy approach:** This model is focused on decreasing the amount of subsidy the recipient provides. The recipient establishes a percentage of rent that will be subsidized for the household for a determined period of time. The recipient communicates with the household how the subsidy provided will decrease over time to support the household in preparing to take over the full rent amount when the subsidy ends.

**Example:** Recipient pays 50% of the rent for months 1-3. The ongoing subsidy need is reviewed at the end of month two and determined that the household is not yet ready to take on the full amount of rent. The recipient agrees to subsidize months 4-6 by paying 35% of the rent. In month five the Recipient revisits the need for ongoing assistance and it is determined that the household can take over the full rent amount after month 7. The recipient agrees to pay 20% of the rent in month 7. The household pays 100% of their rent in month 8.
**Increased tenant income approach:** This model focuses on increasing the percentage of income the household contributes to their rent over the period of time assistance is provided. The recipient will work with the household to determine what percentage of their income will be dedicated to the total rent amount once the subsidy ends and gradually increases the percentage of income the household pays toward their monthly rent with the goal of preparing the household to take over the full rent amount at the end of the subsidy period.

**Example:** Prior to moving in, it is determined that the rent of the selected unit is the equivalent of 65% of the household’s adjusted monthly income. The household contributes 50% of their adjusted income to their rent in months 1-3 and the recipient subsidizes the remaining portion of the rent. Ongoing subsidy need is reviewed at the end of month two and determined that the household is not yet ready to take on the full amount of rent. The recipient agrees to subsidize months 4-6 and the household contribution is increased to 55% of their adjusted income. In month five the recipient revisits the need for ongoing assistance and it is determined that the household can take over the full rent amount after month 7. The household contributes 60% of their monthly income to rent in month 7. The household pays 100% of their rent which is the equivalent to 65% of their monthly income in month 8.

**Budget-based approach:** This approach involves creating a budget with the household before their unit is selected/rented to establish what their rent contribution will be. Recipients will work with households to identify their current household budget and select an amount of rent they household will contribute.

**Setting Limits/Thresholds for Assistance:** Recipients are required to set a threshold for assistance, for example, if a household’s rent is less than an equivalent of 50% of its income it is recommended that ongoing monthly assistance is not provided but that move in-assistance is provided to support the household in obtaining permanent housing.

Assistance thresholds should be documented in the recipient’s program manual and communicated to potential and enrolled households seeking assistance.

The tenant’s portion of the rent is paid directly to the landlord and is subject to the same timeliness requirements as the overall rent. In other words, failure to pay the tenant portion of the rent for an assisted unit can be a reason for eviction.

**7.7 Terminating Assistance**

If a Program participant violates Program rules, the recipient may terminate the assistance. The recipient must have a formal process for terminating assistance and that process must be conveyed to the participant prior to terminating assistance. This process must consist of:

- Written notice to the Program participant clearly explaining the reason for termination.
- A review of the decision, in which the Program participant has at least 10 days to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.

Termination does not bar a participant from receiving assistance at a later date from any recipient of this Program, including the recipient who terminated assistance.
The recipient must carefully consider the reason for termination and all extenuating circumstances so that termination only occurs in the most severe cases.

7.8 Timely Expenditure of Funds

Recipients of Program funds are expected to expend funds in a timely manner. Target benchmarks for expenditures will be defined within the Award Agreement.

Any recipient that fails to expend Program funds in a timely manner may have those funds deobligated by IHCDA. IHCDA reserves the right to reallocate unused funds from one recipient to another recipient. Reallocations will be awarded to organizations that have demonstrated timely and effective utilization of funds and that can demonstrate a need for additional funds to serve more households as evidenced by a list of eligible participants.
Appendix

A.1 Required Forms and Documentation

**Applicant Eligibility Checklist:**
- Application for Housing First Assistance
- Third party documentation of serious mental illness and/or chronic chemical addiction (no particular format required)
- Verification of Housing Crisis Status (IHCDA form)
- Signed receipt of termination/grievance/appeal procedures

**Pre-Leasing Checklist:**
- Income & Asset documentation
- Zero Income Certification (if applicable)
- Tenant Income Calculation Form/Documentation of method of rent contribution
- RAP between recipient and tenant with appropriate Unit Size
- Request For Unit Approval (IHCDA form)
- Review lease (before tenant signs lease)
- Perform Rent Reasonableness check using GoSection8.com
- Completed HQS inspection form (HUD 52580)

**Leasing Checklist:**
- Signed tenant lease
- Signed RAP between recipient and landlord
- W-9 or 1099 from landlord
- Security Deposit assistance (if recipient is paying, ensure it does not exceed 2 months’ rent)

A.2 FAQs

1. Is mileage related to supportive services eligible?
   Yes, mileage related to supportive services can be claimed under supportive services—housing stability case management.

2. Under the admin costs, are indirect allocations eligible for reimbursement; rent for office space, electricity, insurance, phone lines, etc.?
   Yes, indirect allocations are acceptable so long as the Program Manager at IHCDA has a copy of your agency’s cost allocation plan and has approved it.

3. Is renting a trailer eligible?
   a. Yes, so long as the structure is built on a permanent chassis, is designed as a principal place of residence, and passes HQS inspection. Follow the Section 8 rules on manufactured homes which states an additional inspection requirement stated here: “Manufactured Home Tie-Down: A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind.
damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.”

4. Are there any limitations around using the Housing First Funds for individuals who are HUD recipients?

In general, no duplicative assistance may be provided. For example, if the household is already receiving rental assistance under the Section 8 Housing Choice Voucher Program, the household may not also receive rental assistance under the Housing First program. On the flip side, if someone were assisted by ESG (HUD assistance for homeless persons) for transitioning out of a shelter and received security deposit assistance from ESG, they could receive rental assistance (and other assistance) from Housing First except for security deposit assistance. Please reach out to the Program Manager at IHCDA for guidance on specific situations.