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**CITY OF EL PASO**

**Community & Human  
Development**

# **Policies + Procedures**

**For U.S. Department of Housing and Urban  
Development & Texas Department of Housing and  
Community Affairs Grants**

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## Executive Summary

These Policies and Procedures establish the framework for the administration, oversight, and implementation of federal and state funding administered by the City of El Paso Department of Community and Human Development (DCHD). These funds support community development, housing, homelessness response, public services, and other eligible activities intended to benefit low- and moderate-income residents and vulnerable populations within the City of El Paso.

DCHD administers federal entitlement funding received from the U.S. Department of Housing and Urban Development (HUD), including the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and HOME Investment Partnerships Program (HOME). The City also administers state funding through the Texas Department of Housing and Community Affairs (TDHCA), including the Homeless Housing and Services Program (HHSP).

As required by HUD, the City maintains a Citizen Participation Plan (CPP) that establishes how residents, stakeholders, and community organizations participate in the planning and evaluation of federally funded programs through public hearings, public comment periods, and community engagement activities.

Through the CPP process, DCHD conducts Community Needs Assessments (CNA) to identify community priorities and guide development of the Consolidated Plan, the City's five-year strategic planning document for HUD entitlement programs, and the application for TDHCA.

The Consolidated Plan is the City's five-year HUD strategic plan establishing housing and community development priorities and funding strategies. To support the priorities identified in the Consolidated Plan, DCHD may issue Notices of Funding Availability (NOFA), Letters of Interest (LOI), Requests for Applications, or other competitive funding opportunities aligned with identified community priorities, federal objectives, and funding availability. Applications are reviewed for eligibility, compliance, financial capacity, and alignment with applicable regulations and Consolidated Plan priorities.

Funding recommendations are then incorporated into the draft Annual Action Plan (AAP), which identifies the projects, programs, and activities proposed for funding during each program year to help implement the goals and priorities established within the Consolidated Plan. The Consolidated Plan and Annual Action Plan are both subject to public comment, public hearings, City Council approval, and final HUD review and approval. The Annual Action Plan does not become final until approved by HUD.

Following HUD approval, DCHD is responsible for program administration, contract management, compliance monitoring, technical assistance, reimbursement review, performance oversight, required federal and state reporting, and City Council recommendations. At the conclusion of each program year, DCHD prepares the Consolidated Annual Performance and Evaluation Report (CAPER), which evaluates

program performance and is made available for public comment prior to submission to HUD.

These Policies and Procedures are intended to promote transparency, consistency, accountability, regulatory compliance, and responsible stewardship of public funds while supporting the evolving needs of the El Paso community.

Applicable forms, notices, and related documents may be made available on the DCHD webpage under Forms and Notices.

## **Alignment with City Strategic Goals**

Programs, services, and activities funded through CDBG, ESG, HOPWA, HOME, and HHSP are intended to support the City of El Paso's broader strategic goals and priorities as adopted by City Council and updated periodically. Federally and state funded activities administered by DCHD are expected to support initiatives that strengthen the community, improve quality of life, promote housing and community stability, support vulnerable populations, encourage public engagement, and advance responsible stewardship of public resources.

Funding priorities established through the Community Needs Assessment, Consolidated Plan, Annual Action Plan, and competitive process are intended to align, when applicable, with the City's adopted strategic direction and community priorities in effect during the applicable program year.

## **Alignment with HUD Objectives and Federal Requirements**

Programs and activities funded through CDBG, ESG, HOPWA, and HOME must comply with applicable HUD requirements, including eligible activity requirements, HUD National Objectives, fair housing and nondiscrimination requirements, environmental review requirements, procurement and financial management standards, conflict of interest requirements, recordkeeping requirements, and federal reporting and monitoring requirements in accordance with applicable federal regulations, including 24 CFR Parts 91, 92, 570, 574, 576, 578, and 2 CFR Part 200.

Funded agencies, subrecipients, and contractors are responsible for complying with all applicable federal requirements and the terms and conditions of executed funding agreements.

**\*Definitions of key terms and acronyms referenced throughout this document are included in the Glossary section at the end of this manual.**

## **Strategic Program Overview**

The City's housing and community development efforts are guided by a strategic approach that prioritizes the effective use of federal and state resources to address local housing needs, improve community facilities, and expand access to essential services for low- and moderate-income individuals and households. Through programs such as HOME, CDBG, ESG, HOPWA, and HHSP, the City supports a comprehensive continuum of housing assistance, homelessness prevention, supportive services, and community development initiatives.

Eligible activities across all DCHD administered programs, including HOME, CDBG, ESG, HOPWA, and HHSP, are limited to those identified in the applicable fiscal year Notice of Funding Availability (NOFA) and/or other formal funding solicitations issued by the Department. Subject to the availability of funds, DCHD may issue NOFAs, LOI, Requests for Applications (RFAs), or other competitive funding opportunities to support a range of eligible activities.

Each NOFA or funding solicitation establishes the applicable federal, state, and local regulatory requirements, programmatic guidelines, underwriting standards, and compliance obligations, while also identifying anticipated funding priorities and tentative allocation thresholds. In the event that a high volume of competitive and eligible applications is received, the Director may, at their discretion, recommend adjustments to the available funding allocation to better meet program demand and strategic priorities. Final project selection and award of funds are subject to approval by City Council.

Program-specific requirements are identified in the applicable funding source section below, as well as the respective federal or state regulations governing each program.

## **HOME Investment Partnerships Program (HOME) & Community Development Block Grant Revolving Loan Funds (CDBG-RLF)**

The HOME Program provides formula grants to states and local governments to fund affordable housing activities, including acquiring, constructing, and/or rehabilitating affordable housing for rent or homeownership. HOME funds are typically dispersed in the form of grants, amortized loans, and deferred forgivable loans.

CDBG-RLF Funds are a combination of proceeds from principal and interest generated from prior years' first-time home buyers, single family renovation, and multi-family affordable rental development borrowers. These funds cannot be used for new construction of affordable housing under HUD regulations but may be used to support housing rehabilitation programs or development of multi-family affordable rental units.

The CNA and City of El Paso Housing Policies guide HOME and CDBG-RLF investment in affordable housing production, rehabilitation, and homebuyer assistance.

### **Funding Allocation**

The funding allocation for each of the housing programs described above will be determined based on community need and the ability for programs to feasibly serve El Pasoans given HUD requirements and housing market conditions. Actual allocations are to be established through approval of the upcoming year's Annual Action Plan which is approved by City Council.

### **Development of Affordable Housing**

When sufficient fund balances are available, DCHD may issue Notices of Funding Availability (NOFA), Letters of Interest (LOI), Requests for Applications, or other competitive funding opportunities for new construction or rehabilitation of affordable rental units. The NOFA defines all regulatory, programmatic, and compliance requirements, while establishing a tentative funding threshold. If DCHD receives a high volume of competitive proposals, the Director retains the discretion to increase the available funding allocation. Final project selections and award of funds are approved by City Council.

### **Single-Family Owner-Occupied Renovation Program**

The purpose of the Single-Family Owner-Occupied Renovation Program is to assist low to moderate income homeowners (households at 80% or less of area median income as determined by HUD) to increase safety, sanitation and functionality of their homes.

While it is DCHD's commitment to enhancing housing opportunities, the program is closed. The program policies adopted in FY26 remain in full effect until they are formally superseded.

# Community Development Block Grant (CDBG)

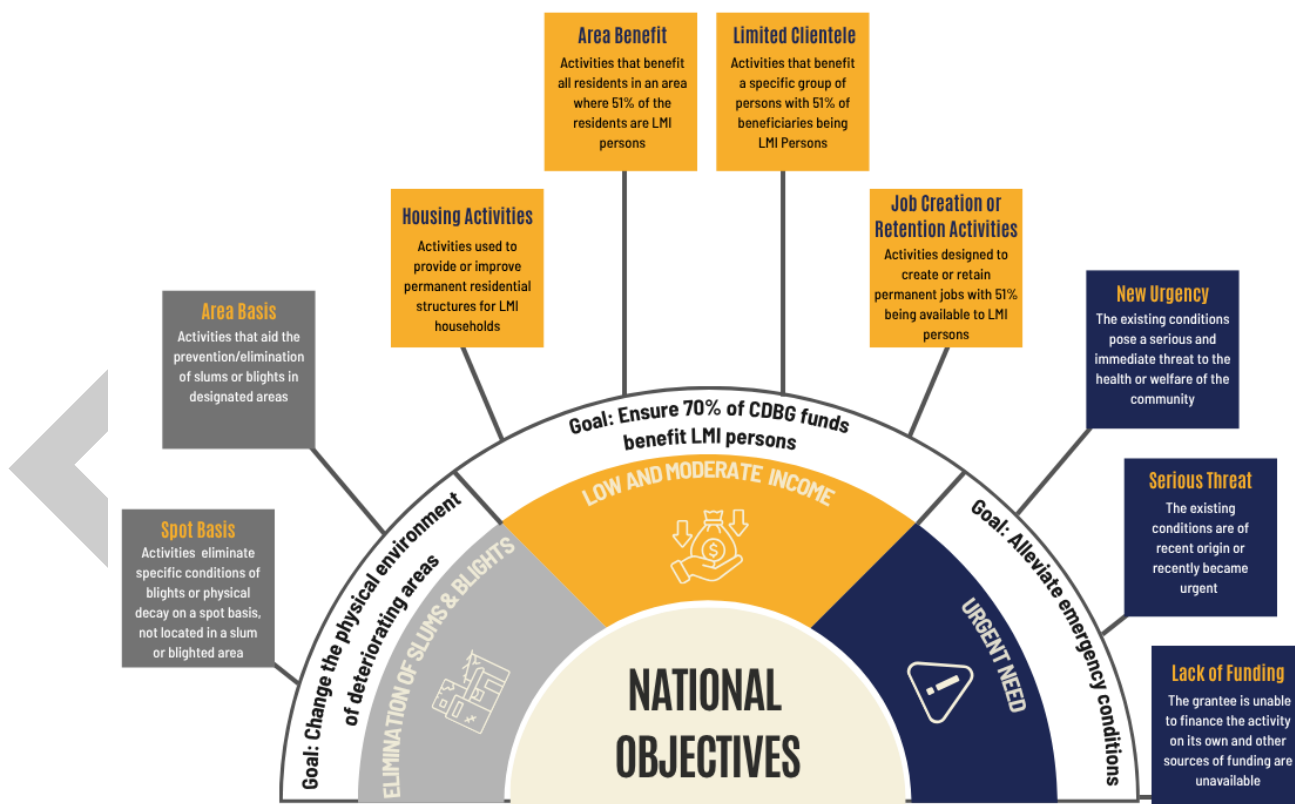
The primary objective of the CDBG Program is the development of viable urban communities, including decent housing, suitable living environments, and the expansion of economic opportunities, principally for persons of low and moderate income. The following sections explain the services, programs, and projects that are funded through CDBG.

## HUD National Objectives

The authorizing statute of the CDBG program requires that every funded activity, except for program administration and planning activities, meet one of three national objectives. The three national objectives are:

- ❖ Benefit to low- and moderate-income (LMI) persons;
- ❖ Aid in the prevention or elimination of slums or blight; and
- ❖ Meet a need having a particular urgency (referred to as an urgent need).

To comply with CDBG requirements, all activities must meet a national objective. The following exhibit depicts the different categories associated with each of the national objectives.



## Low and Moderate Income (LMI) National Objective

The LMI national objective is often referred to as the “primary” national objective because the statute requires that recipients expend 70 percent of their CDBG funds to benefit LMI persons. Below are the four categories that can be used to meet the LMI national objective:

- ❖ **Low Moderate Area Benefit (LMA)** - The area benefit category is the most commonly used national objective for activities that benefit a residential neighborhood. An area benefit activity benefits all residents in a particular area where at least 51 percent of the residents are LMI persons.
- ❖ **Low Moderate Income Limited Clientele (LMC)** - The Limited Clientele category applies to activities that benefit a specific group of persons rather than all residents of a geographic area. Under this category, at least fifty one percent (51%) of beneficiaries must be low and moderate income persons, unless the activity serves a HUD presumed benefit group or is restricted exclusively to low- and moderate-income persons. To qualify under this category, the activity must meet one of the following conditions:
  - Benefit a clientele presumed by HUD to principally consist of low and moderate income persons, including abused children, battered spouses, elderly persons, adults meeting HUD’s definition of severely disabled, persons experiencing homelessness, illiterate adults, persons living with HIV/AIDS, and migrant farm workers; or
  - Require and maintain income documentation demonstrating that at least fifty one percent (51%) of beneficiaries are low and moderate income persons; or
  - Have income eligibility requirements limiting participation exclusively to low and moderate income persons; or
  - In limited circumstances, provide a service of such nature and location that DCHD can reasonably conclude the activity primarily serves low and moderate income persons. Such determinations must be adequately justified and documented in the project file in accordance with HUD guidance, and DCHD approval.
- ❖ **Low Moderate Housing Activities (LMH)** - The housing category of LMI benefit national objective qualifies activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households.
- ❖ **Low Moderate Job Creation or Retention Activities (LMJ)** - The job creation and retention LMI benefit national objective addresses activities designed to create or retain permanent jobs, at least 51 percent of which (computed on a full-time equivalent basis) will be made available to or held by LMI persons.

DCHD utilizes HUD’s Income Limits that are provided on an annual basis to determine if a person or household is of low to moderate income. Current income limits are available directly through HUD’s website and must be applied in accordance with the applicable

program requirements. Current HUD Income Limits may be accessed at: [HUD Income Limits Documentation System](#).

## **Elimination of Slums or Blight National Objective**

The focus of activities under the elimination of Slums and Blight national objective is a change in the physical environment of a deteriorating area. This contrasts with the LMI benefit national objective, where the goal is to ensure that funded activities benefit LMI persons. Three categories are used to qualify activities under this national objective:

- ❖ **Slum Blight Area Basis (SBA)** - This category covers activities that aid in the prevention or elimination of slums or blight in a designated area. To qualify under this category, the area in which the activity occurs must be designated as slum or blighted. Documentation must be maintained by the grantee on the boundaries of the area and the conditions that qualified the area at the time of its designation. The designation of an area as slum or blighted must be re-determined every 10 years for continued qualifications.
- ❖ **Slum Blight Spot Basis (SBS)** - These activities eliminate specific conditions of blight or physical decay on a spot basis and are not located in a slum or blighted area. Activities under this category are limited to acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities. Furthermore, rehabilitation is limited to the extent necessary to eliminate a specific condition detrimental to public health and safety.

## **Urgent Need National Objective**

Use of the Urgent Need national objective category is rare. It is designed only for activities that alleviate emergency conditions. Urgent Need qualified activities must meet the following criteria: the existing conditions must pose a serious and immediate threat to the health or welfare of the community; the existing conditions are of recent origin or recently became urgent (generally, within the past 18 months); the grantee is unable to finance the activity on its own; and other sources of funding are not available.

Refer to HUD's 24 CFR Part 570.208 for further information on the criteria for national objectives.

## **Public Services**

The Public Services category of CDBG is intended to maximize outcomes in our community based on the identified needs of vulnerable populations. Public Service programs aim to respond to emerging community needs and/or expand services for an existing need as well as attempt to align and enhance other CDBG and locally funded activities. Periodically, DCHD will conduct a Community Needs Assessment (CNA), which will determine priority needs and gaps to which Public Service funds will be available for applicants. A comprehensive CNA will be conducted every three years, and a small-scale assessment will be conducted on an annual basis. Should a crisis arise, the DCHD Director may

determine that a comprehensive CNA be conducted. The CNA will be published annually on the DCHD website.

DCHD solicits funding proposals from eligible public agencies and nonprofit organizations for the use of CDBG funds for Public Service activities. For-profit entities are not eligible under this category. Federal regulations stipulate that a maximum of 15% of the annual CDBG funding may be allocated to Public Services.

### **CDBG Public Services - Innovative Program Incubator**

The Innovative Program Incubator category is designed to give funding opportunities for innovative, promising programs. The purpose of this category is to create new initiatives and program structures that can prove to be best practices throughout the public service community. Programs applying for incubator funding will be required to provide projected performance outcomes inclusive of key performance indicators. Metrics should be illustrative of community impact indicated by improvement from baseline conditions. Alignment with priorities identified through the Community Needs Assessment, as well as alignment with the City of El Paso Consolidated Plan, and City Strategic Plan is required.

The Innovative Program Incubator is funded as a \$100,000 program set aside for a single program. However, the Department may determine, at its discretion, whether to establish or fund the Innovative Program Incubator category during a given funding cycle based on community needs, funding availability, program priorities, or the quality and responsiveness of applications received. However, DCHD may redistribute partial or whole funding of this set-aside to one or more CDBG Public Services categories if the Department does not receive an application for an incubator program that is responsive to the objective of the set-aside. Incubator grant projects do not have to fall within the designated Service Categories, but they must meet DCHD Public Services guidelines. While both new and existing agencies can apply, the program itself must be new and must not have received funding in any previous CDBG funding cycle.

### **CDBG Project Eligibility & Performance Types of Eligible Service Programs**

Projects must provide direct services to clients who qualify under HUD income guidelines and who reside within the limits of the City of El Paso. Funded agencies will be required to verify each client's residence and eligibility. HUD has determined that the following populations meet income guidelines and are presumed eligible, therefore no additional income verification is needed:

- ❖ Elderly persons (aged 62 and older)
- ❖ Severely disabled adults
- ❖ Homeless persons
- ❖ Abused children, battered spouses
- ❖ Persons living with AIDS
- ❖ Migrant farm workers
- ❖ Illiterate adults

## Other Project Compliance & Implementation Eligibility Requirements

- ❖ **Agency Strategic Planning** - Applicant agencies must submit along with their application, the agency's most recently approved mid to long-term strategic plan and/or sustainability plan as well as their current annual plan.
- ❖ **Budget Revisions** - Budget revisions may be requested among existing budget line items. All budget revisions occurring within the contract period may not exceed 20% of the total award without the approval of the DCHD Director or their designee. Only budget modifications/revisions that result in a significant change of scope, performance measures, or outcomes require a contract amendment.
- ❖ **Emergency Shelter Funding** - Agencies may apply specifically for "Emergency Shelter" component funding from both the Emergency Solutions Grant and the Community Development Block Grant. Funding may be awarded from multiple entitlement grants, such as CDBG or ESG, but they are not exclusive.
- ❖ **Financial Capacity** - CDBG funds are distributed on a reimbursement basis. All agencies receiving funds must demonstrate the financial capacity to fully operate the proposed project for a period of at least three months prior to reimbursement. Applicants will be required to provide verification of three months of capital for the sustainability of their public service program.
- ❖ **Funding Request** - The Minimum funding request by applicant for any project must be \$100,000.
- ❖ **El Paso Helps** – CDBG services must align with and compliment El Paso Helps, the City-led initiative to coordinate street outreach and other services for vulnerable populations. This includes collaboration with the El Paso Helps partners during the collaborative meetings.
- ❖ **Income Verification** - Subrecipient must verify, through use of a DCHD-issued or approved Income Eligibility Form, the client income to confirm CDBG eligibility for clients receiving services.
- ❖ **Multiple sites** - The Applicant must complete an Activity/Partner Supplement if their program provides services in more than one location. The Activity/Partner Supplement must be completed for each site. A budget must be produced for each site if any non-shared resources are being requested, and the budgets for the combined sites or activities must align with the budget for the overall project. If the applicant's program consists wholly of shared resources, then only one budget for the overall project must be completed. An example of a non-shared resource is supplies that will be used at each separate site; an example of a shared resource is an instructor who travels to different sites to offer classes.
- ❖ **Partnerships** - Applicants must state in their application if they plan to partner with another agency. The identification of the partnership and plan of action for the partnership must be outlined in the CDBG application when it is submitted to DCHD.
  - If any portion of the project will be carried out by a partner, contractor, consultant, or other third party, the Activity/Partner Supplement of the

application must be completed, reflecting the role of the partner. This supplement will be provided as a module within the application.

- ❖ **Program Scope + Eligibility** - Applicants may submit more than one proposal that offers different services within a single service category or in more than one service category. However, the proposal cannot provide the same services as another proposal or provide services to clients during the same period that they are being served by another City-funded project. Each proposed project must be clearly defined and easily differentiated from the others. Proposals cannot be dependent or subsidiary to another proposal.
- ❖ **Staff Hours** - The City will only reimburse applicants for staff hours that are spent on direct services funded by CDBG to eligible clients.
- ❖ **Subsidiary Projects** - Projects that are dependent or subsidiary to one another should be submitted as a single project.

### **Performance Goals**

Applicants must have the capability to track their project outcome(s), performance measures and units of service over time and report on results if the project/activity is eventually funded. Funded projects will have a contractual obligation to meet projected outcomes, and performance measures. Failure to meet these obligations may result in a temporary or permanent hold on reimbursement and affect their performance evaluation done through the use of an Agency Credit Score, described later on these Policies and Procedures. Further technical assistance on this subject will be provided to funded agencies upon request.

## **Public Facilities**

Public facilities improvements are generally interpreted to include all facilities and improvements that are publicly owned or that are owned by a non-profit and open to the general public. CDBG Public Facilities funding must be used to service or benefit LMI persons, including those populations who are generally presumed to be LMI.

DCHD solicits funding proposals from interested City departments, non-municipal government entities, and non-profit agencies for the use of CDBG funds for public facilities improvements within the city limits of El Paso. The minimum funding amount for a Public Facilities project is \$1,000,000, though lower-budget projects may be made eligible at the discretion of the Director of DCHD to maximize community impact and ensure timely expenditure of HUD funds.

### **3-Year Community Vulnerability Capital Improvement Plan**

Periodically, DCHD will conduct a CNA that includes priority needs and gaps to which Public Facilities funds will be available for applicants. Recommendations for Public Facilities projects represent a 3-year allocation plan, including the projects to be wholly or partially funded under the first year's HUD allocation, as well as the projected funding for projects in the second and third years of the Public Facilities funding cycle. This 3-year funding cycle allows for multi-year, phased funding for design and construction activities of approved projects that significantly aid in the City's ability to meet HUD's timely expenditure requirements.

The 3-year allocation plan is contingent upon City Council approval and HUD's approval of the Annual Action Plan. Funding recommendations extending into the second and third years are also contingent upon the City's receipt of those respective annual allocations and no commitment for future years can be guaranteed.

### **Public Facilities Project Eligibility**

Projects must qualify under a HUD National Objective and be within the limits of the City of El Paso. Funded agencies will be required to verify and maintain eligibility documentation.

[For a complete list of eligible Public Facilities projects, refer to 24 CFR 570.201\(c\).](#) [For a complete list of ineligible CDBG activities, refer to 24 CFR 570.207.](#)

The following sections explain the requirements that are unique to the applicant groups. Each applicant must adhere to these requirements, as well as all applicable local, state, and federal regulations, including all general project eligibility and compliance standards.

#### ❖ **City of El Paso Owned Projects**

- **Availability of Operating Funds for New Construction or Expansion Projects** - City Departments must provide a signed commitment from designated City officials, at minimum the Department Director, guaranteeing operational and maintenance (O&M) funding for at least 5 years after a new or expanded facility is completed.
- **Project Scope of Work + Cost Estimates** - City Departments are required to submit with their application a cost estimate that has been reviewed and/or prepared by the Capital Improvement Department (CID). The City Department must ensure that the cost estimate correctly reflects the project's scope of work, as DCHD will not recommend additional funds for unforeseen site conditions that reasonably could have been identified.
- **Required Cash Match** – City Departments are required to provide at the start of the project a minimum of 10% of the total project cost from a non-CDBG funding source, unless a written waiver from the DCHD Director has been secured.

#### ❖ **Non-Municipal Governmental Entities & Non-Profit Organizations**

- **Budget + Task Schedule** - Non-Municipal Governmental Entities & Non-Profit Organizations are required to submit a budget that defines the budget line items associated with the soft and hard costs of the project, and a schedule of tasks involved in carrying out the project.
- **Collateral** - Non-Municipal Governmental Entities & Non-Profit Organizations must be able to secure the CDBG funding by providing project collateral in the form of a Letter of Credit, Promissory Note and Deed of Trust, or an Escrow Account. Collateral must be at minimum equal to the amount of CDBG funding awarded and secured at minimum for the duration of construction.
- **Leased Property** - Non-Municipal Governmental Entities & Non-Profit Organizations Projects that include leased property will be considered on a case-to-case basis. For consideration, the applicant must provide the following documents: 1) the terms of the lease agreement inclusive of the property being leased for at minimum 5-years after project completion, and 2) approved documentation certifying that the lessor has acknowledged and approves of the CDBG-funded facilities improvements.
- **Owned Property** - Non-Municipal Governmental Entities & Non-Profit Organizations Projects that include owned property must provide the Deed of Trust.
- **Project Scope of Work + Cost Estimates** - Non-Municipal Governmental Entities & Non-Profit Organizations projects involving rehabilitation or new

construction are required to be estimated and designed by an architect or engineer licensed in the State of Texas.

- **Property Appraisal** - Non-Municipal Governmental Entities & Non-Profit Organizations must submit a current appraisal value of property in the form of a Market Analysis, Certified Audit Report or a Report from the El Paso Central Appraisal District (EPCAD).
- **Required Cash Match** - Non-Municipal Governmental Entities & Non-Profit Organizations are required to provide at the start of the project a minimum of 10% of the total project cost from a non-CDBG funding source.

## **Public Facilities Compliance & Implementation Eligibility Requirements**

The City of El Paso provides gap financing for Public Facilities projects. Applicants must explore all possible outside funding sources such as other federal, state, local funding or a combination of these and other resources prior to applying to the City of El Paso for gap financing. Based on the application and funds leveraged, the City of El Paso maintains the discretion to approve, modify, or reject the financing terms proposed by the applicant.

CDBG funds are distributed on a reimbursement basis. All agencies receiving funds must demonstrate the financial capacity to fully operate the proposed project for a period of at least three months prior to reimbursement. Applicants will be required to provide verification of three months of capital for the sustainability of their public service program.

Applicants receiving funding are expected to operate and maintain funded facilities for their approved and intended use and ensure they remain open and accessible to the general public throughout the required compliance period, including the Reversionary Period.

Projects must continue to meet the applicable national objective requirements under 24 CFR 570.208, and applicants must maintain documentation demonstrating beneficiary eligibility and services provided under the program.

Applicants are responsible for maintaining complete, accurate, organized, digitized, and accessible program and client records in accordance with applicable federal recordkeeping requirements, including 24 CFR 570.506.

All funded activities must comply with applicable federal, state, and local laws, regulations, ordinances, codes, and program requirements, including nondiscrimination, accessibility, civil rights, labor standards, procurement, and environmental requirements.

## **Public Facilities Performance Goals**

Subrecipients must have the capability to track their project outcome(s) over time and report on results. Subrecipients will have a contractual obligation to meet projected outcomes. Failure to meet performance outcomes, including but not limited to number of

clients served, may result in a hold on reimbursement and/or may negatively impact the applicant and affect their Agency Credit Score and future application submission.

## **Volunteer Housing Rehabilitation**

DCHD has allocated approximately \$200,000 in set-aside funding to support a Volunteer Housing Rehabilitation program.

Volunteer Housing Rehabilitation funds may be used to provide basic repairs and accessibility improvements for homes owned by low-income elderly and/or disabled residents throughout the City of El Paso. Eligible costs may include staff time for direct services and licensed labor such as electricians, plumbers, or other skilled trades. No costs may be charged to participating homeowners. This program is intended for minor to moderate repairs and is not designed for major rehabilitation projects.

### **Volunteer Housing Rehabilitation Eligibility**

Projects must provide direct services to clients who qualify under HUD income guidelines and who reside within the limits of the City of El Paso. Funded agencies will be required to verify each client's residence and eligibility. HUD has determined that the following populations meet income guidelines and are presumed eligible, therefore no additional income verification is needed:

- ❖ Elderly persons (aged 62 and older)
- ❖ Severely disabled adults
- ❖ Homeless persons
- ❖ Abused children, battered spouses
- ❖ Persons living with AIDS
- ❖ Migrant farm workers
- ❖ Illiterate adults

For a complete list of eligible activities, refer to 24 CFR 570.201 - 5070.206. For ineligible activities, refer to 24 CFR 570.207.

### **Volunteer Housing Rehabilitation Compliance & Implementation Eligibility Requirements**

- **Financial Capacity** - CDBG funds are distributed on a reimbursement basis. All agencies receiving funds must demonstrate the financial capacity to fully operate the proposed project for a period of at least three months prior to reimbursement. Applicants will be required to provide verification of three months of capital for the sustainability of their public service program.

- **Maximum Value of Rehabilitation** - The total value of improvements at one location (i.e., home) cannot exceed \$4,999.
- **Mobile Home Improvements** - Funding cannot be used to improve mobile homes, regardless if the value of the home or property is more than the maximum value of the rehabilitation.

## **Volunteer Housing Rehabilitation Performance Goals**

Subrecipients must have the capability to track their project outcome(s) over time and report on results. Subrecipients will have a contractual obligation to meet projected outcomes. Failure to meet performance outcomes, including but not limited to number of clients served, may result in a hold on reimbursement and/or may negatively impact the applicant and affect their Agency Credit Score and future application submission.

## **Housing Opportunities for Persons with Aids (HOPWA)**

The Department of Community & Human Development receives funding for the Housing Opportunities for Persons with Aids (HOPWA) program, which provides HOPWA eligible activities such as housing assistance and supportive services for low-income individuals living with +HIV/AIDS and their families in accordance with CFR Part 574. While housing assistance is limited to residents within the City of El Paso, case management and supportive services can be provided countywide, ensuring broader access to critical resources for individuals in need. HOPWA funds may be used to assist in all forms of housing designed to prevent homelessness, including emergency housing, shared housing arrangements, apartments, single room occupancy (SRO) dwellings, and community residences. All HOPWA subsidized housing must be located within El Paso County.

### **HOPWA eligible activities include\*:**

- ❖ Housing Information Services
- ❖ Supportive Services
- ❖ Permanent Housing Placement (PHP)
- ❖ Tenant-Based Rental Assistance (TBRA)
  - Long-Term Program Delivery
- ❖ Short-Term Rent, Mortgage, Utilities (STRMU)
  - Short-Term Program Delivery
- ❖ Administration
- ❖ Resource Identification

## Supportive Services

Supportive Services refers to time spent by staff to improve a client's access to care/services related to all eligible supportive services expenses listed below.

### Eligible Supportive Services Expenses

- ❖ Health/mental health\*
- ❖ Assessment
- ❖ Day care
- ❖ Personal assistance
- ❖ Nutritional services
- ❖ Intensive care when required
- ❖ Assistance in accessing local, state, and federal government benefits and services
- ❖ Transportation
- ❖ Education
- ❖ Life skills management
- ❖ Staff time, fringe, benefits associated with administering Supportive Services

\*Health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals;

## Permanent Housing Placement (PHP)

Permanent Housing Placement (PHP) helps eligible individuals and families find safe and affordable housing, with the goal of establishing permanent residency. PHP can help those who faced an eviction or especially benefit relocating clients in emergency situations (i.e. natural disasters) or in need of protections provided by the Violence Against Women Act (VAWA).

### Eligible PHP Expenses

- ❖ Application fees
- ❖ Administrative fees in lieu or in addition to a security deposit
- ❖ Credit check expenses
- ❖ First/last month's rent
- ❖ Housing referrals
- ❖ Mediation services related to neighbor/landlord issues (at the time of placing client in unit only)
- ❖ One-time utility connection fees
- ❖ Payment for representative payee services
- ❖ Rental insurance (First month or initial term)
- ❖ Tenant counseling
- ❖ Rent/utility arrears when a barrier to establishing new permanent housing

- ❖ Security deposits less than 2 months' rent and not exceed any state/local cap on assistance
- ❖ Staff, fringe, benefits associated with PHP
- ❖ Utility deposit and one-time utility hookup fees

### **Ineligible PHP Expenses**

- ❖ First and/or last month's rent when a person already has a rental subsidy
- ❖ Housing supplies and goods
- ❖ Moving services and packing materials
- ❖ Regular recurring costs (i.e. ongoing rent, utilities, insurance, etc.)
- ❖ Repairs to the unit associated with the move in
- ❖ Security deposits greater than 2 months' rent
- ❖ Smoke alarms
- ❖ Staff time, fringe, and benefits NOT associated with PHP work
- ❖ Storage fees
- ❖ Standard household furnishings
- ❖ Renter's insurance after first month or initial term payment

### **Tenant-Based Rental Assistance (TBRA)**

Project- or tenant-based rental assistance includes assistance for shared housing arrangements. The purpose of TBRA is a rental subsidy used to help participants obtain permanent housing. TBRA is subject to Fair Market Rent (FMR) and Rent Reasonableness Requirements, as determined by HUD.

A HOPWA eligible person may be eligible for TBRA if the following criteria is met:

- ❖ Eligible person does not own a home

Eligible person must not currently receive or expect to receive a rental subsidy from other federal, state, or local sources

### **Ineligible TBRA Expenses**

- ❖ Late fees caused by late payment to the Landlord by the Project Sponsor
- ❖ Rent for a unit owned by a client's relative
- ❖ Security deposits
- ❖ Expenses due to repairs or damage
- ❖ Mortgage expenses

### **Long-Term Program Delivery**

Long-Term Program Delivery includes staff time, fringe and benefits costs directly related to administering Long-Term Rental Assistance.

**Some eligible Long-Term Program Delivery expenses include, but are not limited to:**

- ❖ Staff time spent verifying rent reasonableness

- ❖ Mileage to perform housing inspections

**Some ineligible Long-Term Program Delivery expenses include, but are not limited to:**

- ❖ Rental assistance
- ❖ Utilities assistance
- ❖ Other forms of direct client assistance

## **Short-Term Rent, Mortgage & Utilities (STRMU)**

Short-Term Rent, Mortgage, and Utility (STRMU) payments prevent the homelessness of the tenant or mortgagor of a dwelling, for no more than 21 days in a 52-week period. The period of assistance begins on the day that the first payment is made. STRMU are not subject to Fair Market Rent (FMR) and Rent Reasonableness Requirements.

A HOPWA eligible person may be eligible for STRMU if the following criteria is met:

- ❖ Eligible person has a lease or mortgage on file
- ❖ Eligible person/household demonstrates a need for STRMU assistance in at least one the following ways:
  - Other resources will not help address housing costs
  - Household is at risk of homelessness if assistance is not administered
  - STRMU assistance will alleviate any payment delinquency to avoid eviction and result (at least) in temporary stability for that household
  - Household's ongoing needs assessed in connection with the development of an individual housing and services plan for the household

### **Eligible STRMU Expenses**

- ❖ Short-term rent
- ❖ Mortgage
- ❖ Utilities

### **Ineligible STRMU Expenses**

- ❖ Realtor fees
- ❖ Moving assistance
- ❖ Security deposit & first month's rent
- ❖ Late fees caused by late payment to the Landlord by the Project Sponsor
- ❖ Auto-repair expenses
- ❖ Unit repair or damage expenses
- ❖ Expenses associated with internet, cable, or phone services
- ❖ Assistance that occurs over a period of more than 21 weeks in any 52-week period
- ❖ Household supplies & furnishings
- ❖ Personal needs

## Short-Term Program Delivery

Short-Term Program Delivery includes staff time, fringe, and benefits directly related to administering STRMU. **Some ineligible Short-Term Program Delivery expenses include, but are not limited to:**

- ❖ Rental assistance
- ❖ Mortgage assistance
- ❖ Utilities assistance
- ❖ Other forms of direct client assistance

## Administration

Administration expenses are limited to a 7% cap per Project Sponsor grant allocation.

### Eligible Administration Expenses

- ❖ Office supplies and postage
- ❖ Rent and utilities of office space
- ❖ Costs associated with attending HOPWA-related trainings approved by HUD
- ❖ Staff time spent creating and submitting reports, compiling claims, etc.

### Ineligible Administration Expenses

- ❖ Employee bonuses
- ❖ Costs directly associated with other eligible HOPWA activities

## Resource Identification

Resource identification refers to system-level activity that allows Project Sponsors to build and improve their community response to expand access to housing and HIV treatment.

### Eligible Resource Identification Expenses

- ❖ Identifying and tracking housing resources for current/future clients
- ❖ Strengthening relationships with local landlords, PHAs, and other local and state affordable housing partnerships
- ❖ Attending housing-related meetings such as Regional Planning Council meetings on your agency's behalf
- ❖ Coordinating housing case management efforts across HOPWA networks
- ❖ Collecting and analyzing local HIV housing data
- ❖ HIV housing needs assessments done by third party consultant or contractor

## Housing Information Services

Housing Information Services refer to staff time determining the best type(s) of HOPWA assistance to administer to each client.

### Eligible Housing Information Services Expenses

- ❖ Counseling
- ❖ Informational materials that educate clients on housing resources (i.e. fair housing guidance)
- ❖ Referral services to assist an eligible person locate, acquire, finance, and maintain housing

### Ineligible Housing Information Services Expenses

- ❖ Holistic case management services

## Program Participant Eligibility

A HOPWA eligible person is defined as a person with acquired immunodeficiency syndrome or a related disease who is low-income and the family of such a person.

- ❖ The term acquired immunodeficiency syndrome and related diseases means the disease of acquired immunodeficiency syndrome and any conditions arising from the etiologic agent for acquired immunodeficiency syndrome.
- ❖ A low-income individual is a person with household income that is at 80% of the Area Median Income Guidelines (AMI) or less, as defined by HUD. HUD income guidelines are issued annually.

As such, client files should consist of:

- ❖ Documentation indicating that the assisted person is HIV positive or has a diagnosis of AIDS, as determined by a health professional competent to make such a determination ((i.e. doctor, nurse practitioner, physician's assistant, OR a testing site representative who is authorized to cite the client's HIV/AIDS status and provide appropriate test result documents).
  - Sufficient determinations include documentation resulting from appropriate HIV tests administered by a physician's office, HIV counseling center or community health center.
- ❖ Documentation confirming that the assisted person and his/her family meet income guidelines.

## HIPAA Compliance

Agencies administering HOPWA funds must comply with the Health Insurance Portability and Accountability Act (HIPAA) to protect the confidentiality and privacy of individuals living with HIV/AIDS. Since HOPWA services are directly tied to a person's HIV status,

agencies must handle all client information with strict confidentiality to prevent unauthorized disclosure and protect clients from stigma and discrimination.

### **Non-Match Funding Stream**

HOPWA funds cannot be used to match other federal grants or loans.

## **Emergency Solutions Grant (ESG)**

Emergency Solutions Grant (ESG) funds street outreach, emergency shelter, homelessness prevention and rapid re-housing and Homeless Management Information System (HMIS) and administration. The purpose of the ESG program is to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. The ESG program is governed by federal laws and regulations including the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act (42 U.S.C. §11302 et. seq.) as amended; the HUD regulations codified in 24 Code of Federal Regulations (CFR) Part 576; 24 CFR Part 58, for environmental requirements; 2 CFR Part 200 for Uniform Administrative Requirements; 24 CFR §135.38 for Section 3 requirements; and 24 CFR Part 5, Subpart A for fair housing (collectively, the Federal Rules and Regulations).

### **Funding Allocation**

The City understands the importance of an effective crisis response system that makes homelessness rare, brief, and non-recurring. Given the current need to relieve pressure on El Paso’s emergency shelters, support for homelessness prevention and rapid rehousing activities is a priority.

HUD limits the amount of ESG funding for Emergency Shelter and Street Outreach to 60% of the total allocation. Therefore, the final funding distribution between components will be determined based on data-informed community needs at the time of application review. The following allocations are preliminary projections and may be adjusted based on CFR regulations, funding requests, and demonstrated community needs:

Allocation	Eligible Activities
25%	Street Outreach
15%	Emergency Shelter
20%	Homelessness Prevention
26%	Rapid Re-Housing
7% (Set Aside)	Homeless Management Information System (HMIS)
7%	City of El Paso - Administration

These projected distributions are subject to change based on community needs and applications received to ensure that ESG funds are allocated effectively and in compliance with HUD regulations.

## **Street Outreach Component**

Eligible street outreach costs include: costs of providing essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility, as further identified in 24 CFR 576.101. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraphs (1)(i) of the "homeless" definition under 24 CFR 576.2.

## **Emergency Shelter Component**

Eligible emergency shelter costs include costs of operating emergency shelters, providing essential services to homeless families and individuals. Providing case management; cost of assessing arranging, coordinating and monitoring individualized services.

Component services and activities consist of: The use of coordinated entry system, conducting initial evaluations, verifying eligibility, counseling, developing securing and coordinating services and obtaining federal, state and local benefits monitoring and evaluating participant progress, providing information and referrals to other providers, providing ongoing risk assessment for victims of domestic violence, developing an individualized housing service plan, including planning a path to permanent housing stability, as identified in 24 CFR 576.102

## **Homelessness Prevention Component**

### **Eligible rental assistance includes:**

- ❖ Short-term rental assistance (up to 3 months)
- ❖ Medium-term rental assistance (more than 3 months and up to 12 months)
- ❖ One-time payment for up to 6 months of rent in arrears, to include late fees.

Eligible costs include rental application fees, security deposits, last month's rent, utility deposits, utility payments (with a limit of 6 months in utility payment arrears), and moving costs (including storage costs up to 3 months). Applicants must re-evaluate the program participant's eligibility, type and amounts of assistance, and program participants needs no less than every three (3) months.

## **Housing Relocation and Stabilization Services**

### **Eligible services include:**

- ❖ Housing search and placement;

- ❖ Housing stability case management mediation;
- ❖ Legal services; and
- ❖ Credit Repair

**Eligible case management services include:**

- ❖ Coordinated entry assessments
- ❖ Initial evaluation, counseling
- ❖ Coordinating services
- ❖ Monitoring program participant progress
- ❖ Referrals to other providers
- ❖ Developing an individualized housing plan planning a path to permanent housing stability
- ❖ Conducting re-evaluations required under 24 CFR 576.401(b)

**Rapid Re-Housing Component**

**Eligible rental assistance includes:**

- ❖ Short-term rental assistance (up to 3 months)
- ❖ Medium-term rental assistance (more than 3 months and up to 12 months)
- ❖ One-time payment for up to 6 months of rent in arrears, to include late fees

Eligible costs include rental application fees, security deposits, last month's rent, utility deposits, utility payments (with a limit of 6 months in utility payment arrears), moving costs (including storage costs up to 3 months). The 12 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. The rent amount must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between the tenant and landlord.

Eligibility and income shall be reviewed every six months. Participants in rapid rehousing are required to meet with case managers monthly.

**Housing Relocation and Stabilization Services**

- ❖ Eligible services include:
- ❖ Housing search and placement;
- ❖ Housing stability case management mediation;
- ❖ Legal services;
- ❖ Credit repair

Eligible services under case management include centralized coordinated assessments, initial evaluation, counseling, and coordinating services (for a complete list of eligible case management activities please reference 24 CFR 576.105(b)(2)).

## HMIS

Funding for ESG-funded agencies to cover software licensing fees and other fees incurred by the agency for utilization of HMIS data systems. Applicants for ESG are required to participate and enter their data in the El Paso Homeless Management Information System (HMIS). Refer to the local requirements section of this document for detailed HMIS participation requirements.

### Eligible Activities:

- ❖ Purchasing or leasing computer hardware
- ❖ Purchasing software or software licenses
- ❖ Purchasing or leasing equipment
- ❖ Obtaining technical support
- ❖ Leasing office space
- ❖ Paying charges for utilities (electricity, water, etc.) to operate or contribute to HMIS
- ❖ Paying salaries for operating HMIS
- ❖ Paying costs of staff travel to HUD-sponsored/HUD-approved training on HMIS and other McKinney-Vento Homeless Assistance Act programs
- ❖ Paying staff travel costs to conduct intake
- ❖ Paying participation fees charged by the HMIS Lead

## Other Project Compliance & Implementation Eligibility Requirements

Applicants must match their total ESG award with at least 100% in cash and/or in-kind contributions from non-CDBG sources used for ESG-eligible expenditures, as outlined in 24 CFR 576.201 and 2 CFR 200.306.

If awarded funding, agencies must provide a signed document on official letterhead confirming the amount, source, and date of availability of matching funds before their agreement with the City is executed. Matching contributions should be reported and documented on a monthly basis to ensure compliance and prevent delays in spending.

Agencies should not fall behind on their match contributions, as this slows down the spend rate and may impact future funding eligibility. Maintaining a consistent and timely match helps ensure efficient program operation and compliance with HUD regulations.

### Below are additional requisites that apply to the 100% match requirement:

- ❖ Matching funds must be used on an eligible ESG activity for allowable costs.
- ❖ Not more than 50% of agency match may be derived from donations. Clothes and toy donations cannot be used as match.

Matching funds are provided based on the total grant award and do not have to be provided on a component-by-component basis. For example, if an agency is awarded \$10,000 for HMIS, they do not need to find \$10,000 in data collection funds from another source as match. Rather, the \$10,000 match could be used on another ESG component towards

allowable costs. Matching funds must not, and will not, be used to match any other Federal program's funds nor any other federal, state and/or local grant.

Agency must keep records of the source and use of contributions made to satisfy the match requirement. Refer to HUD's 24 CFR Part 576.201 for further information on ESG's matching requirement.

- ❖ **El Paso Helps** - ESG-funded street outreach services must align with and compliment El Paso Helps, the City-led initiative to coordinate street outreach and other services for vulnerable populations. This includes collaboration with the El Paso Helps partners during the collaborative meetings.
- ❖ **Written Standards** - Applicants must certify they have written standards that comply with the requirements of 24 CFR §576.400 to include order of priority. Additionally, a copy of the written standards of the program will be required within 30 days of submission of application.
- ❖ **Budget Revisions** - Budget revisions may be requested among existing budget line items within an ESG component. All budget revisions occurring within the contract period may not exceed 20% of the total award without the approval of the DCHD Director or their designee. A moving of funds between different ESG components requires will **not** be authorized.
- ❖ **Eligibility Guidelines** - Applicant must provide direct services to at-risk or homeless individuals and families. Applicant is required to verify each client's eligibility status.
- ❖ **Program Income** - Applicants are required to report program income and expended match funds monthly.
- ❖ **Rental Assistance** - Applicants who apply to provide Rental Assistance will be required to conduct inspections of housing units for compliance with Housing Standards (24 CFR Part 576.403(c), Lead-Based Paint requirement Standards (24 CFR Part 35, 576.403(a), Fair Market Rent and Rent Reasonableness Standards (24 CFR Part 576.106(d).
- ❖ **Staff hours** - The City will only reimburse applicants for staff hours that are spent on direct services funded by ESG to eligible clients.

## Homeless Housing and Services Program (HHSP)

In accordance with Tex. Government Code §2306.2585, the Texas Department of Housing & Community Affairs (TDHCA) provides HHSP funding to municipalities with populations of 285,500 or greater to develop programs aimed at preventing and eliminating homelessness. The City of El Paso is projected to receive HHSP funds under both General Set-Aside and Youth Set-Aside. Within each, there are five different possible components: Homelessness Assistance (HA), Homelessness Prevention (HP), Essential Services (ES), Operation Costs (OC), and Case Management (CM). The rules, restrictions, and eligibility requirements for HHSP funds can be found within the Texas Administrative Code (TAC). Components available for funding and subject to the Notice of Funding Availability (NOFA).

## General Set-Aside

Eligible applicants include agencies currently administering homelessness prevention, homelessness assistance, and/or essential services programs that incorporate case management as part of their services. The local objectives for HHSP General funding are to:

- ❖ Prevent at-risk families and individuals from becoming homeless.
- ❖ Rapidly re-house individuals and families who are experiencing homelessness.
- ❖ Provide case management to ensure successful outcomes.

## Youth Set-Aside

Eligible applicants must be agencies currently administering youth homelessness programs focused on transitional housing for unaccompanied homeless youth and homeless young adults (ages 18-24). These agencies must provide homelessness assistance, essential services, and/or case management as part of their transitional housing programs. Transitional living activities for youth-headed households are designed to provide short-term housing in conjunction with appropriate supportive services designed to foster self-sufficiency.

The local objectives for HHSP Youth Set-Aside funding are to:

- ❖ Provide case management to eligible youth (ages 18 to 24) in transitional housing.
- ❖ Provide transitional housing for eligible youth (ages 18 to 24), including those who have aged out of foster care.
- ❖ Provide essential services to eligible youth (ages 18 to 24) in transitional housing.
- ❖ Provide homeless assistance to eligible youth (ages 18 to 24) in transitional housing.

These objectives align with the City's strategy to reduce homelessness with targeted support for both at-risk populations and homeless youth by promoting housing stability and long-term success.

## Homelessness Assistance (HA)

As per the TAC Rule §7.27, Homelessness Assistance costs are those associated with housing relocation, stabilization, and assistance costs.

Eligible costs include, but are not limited to:

- ❖ Staff time entering information into HMIS or HMIS-comparable database related to homelessness assistance
- ❖ Hotel or motel costs
- ❖ Transitional housing
- ❖ Rental & utility
- ❖ Rental arrears
- ❖ Utility reconnection fees
- ❖ Reasonable & customary security and utility deposits

- ❖ Moving costs

## **Homelessness Prevention (HP)**

As per the TAC Rule §7.27, Homelessness Prevention costs are those associated with housing relocation, stabilization, and assistance costs.

Eligible costs include, but are not limited to:

- ❖ Staff time entering information into HMIS or HMIS-comparable database related to homelessness prevention
- ❖ Hotel or motel costs
- ❖ Transitional housing
- ❖ Rental & utility
- ❖ Rental arrears
- ❖ Utility reconnection fees
- ❖ Reasonable & customary security and utility deposits
- ❖ Moving costs

## **Essential Services (ES)**

As per the TAC Rule §7.27, Essential Services costs are those associated with finding and maintaining stable housing.

Eligible costs include, but are not limited to:

- ❖ Out-patient medical services
- ❖ Child care
- ❖ Education services
- ❖ Legal services
- ❖ Mental health services
- ❖ Local transportation assistance
- ❖ Drug and alcohol rehabilitation
- ❖ Job training

## **Operation Costs (OC)**

As per the TAC Rule §7.27, Operation Costs are those associated with operating an emergency shelter or Transitional Living Activities, serving individuals experiencing or at-risk of homelessness.

Eligible costs include, but are not limited to:

- ❖ Rent
- ❖ Utilities
- ❖ Supplies and equipment purchases
- ❖ Food pantry supplies

## Case Management (CM)

As per the TAC Rule §7.27, Case Management costs are those associated with staff salaries related to assessing, arranging, coordinating and monitoring the delivery of services related to finding or maintaining housing.

Eligible activities related to staff salaries include, but are not limited to:

- ❖ Household eligibility determination
- ❖ Counseling
- ❖ Coordinating services & obtaining mainstream benefits for program participants
- ❖ Monitoring program participant progress
- ❖ Providing safety planning for persons under VAWA
- ❖ Developing a housing and service plan
- ❖ Entry into HMIS or an HMIS-comparable database

## Program Participant Eligibility & Program Participant Files

As per the TAC Rule §7.28, the following requirements pertain to program participant eligibility and recordkeeping:

- ❖ A Program Participant must satisfy the eligibility requirements by meeting the appropriate definition of Homeless or At-risk of Homelessness in this Chapter, relating to Homelessness Programs, including but not limited to applicable income requirements.
- ❖ A Program Participant who is Homeless qualifies for emergency shelter, Transitional Living Activities, case management, essential services, and homeless assistance.
- ❖ A Program Participant who is At-risk of Homelessness qualifies for case management, essential services, and homeless prevention.
- ❖ The Subrecipient shall establish income limits that do not exceed the moderate income level pursuant to Tex. Gov't Code §2306.152 in its written policies and procedures, and may adopt the income limit calculation method and procedures in HUD Handbook 4350 to satisfy this requirement.
- ❖ Recertification. Recertification is required for Program Participants receiving homelessness prevention and homelessness assistance within 12 months of the assistance start date. Subrecipient's written policies may require more frequent recertification. At a minimum, recertification includes that Program Participants receiving homelessness prevention or homelessness assistance:
  - meet the income eligibility requirements as established by the Subrecipient, if such limits are implemented in the Subrecipient's policies and procedures and required to be reviewed at Recertification; and
  - lack sufficient resources and support networks necessary to retain housing without assistance.
- ❖ Break in service. The Subrecipient must document eligibility before providing services after a break in service. A break in service occurs when a previously

assisted household has exited the program and is no longer receiving services through Homeless Programs. Upon reentry into HHSP, the Household is required to complete a new intake application and provide updated source documentation, if applicable. The Subrecipient would not need to document further eligibility for HHSP if the Program Participant is currently receiving assistance through ESG.

- ❖ Program participant files. Subrecipient or their Subgrantees shall maintain Program Participant files, for non-emergency activities providing direct subsidy to or on behalf of a Program Participant that contain the following:
  - an Intake Application, including the signature or legally identifying mark of all adult Household members certifying the validity of information provided, an area to identify the staff person completing the intake application, and the language as required by Tex. Gov't Code §434.212;
  - certification from the Applicant that they meet the definition of Homeless or At-risk of Homelessness. The certification must include the Program Participant's signature or legally identifying mark;
  - documentation of income eligibility, if applicable, which may include a DIS if documentation is unobtainable;
  - documentation of annual recertification, as applicable, including income eligibility determination and verification that the Program Participant lacks sufficient resources and supports networks necessary to retain housing without assistance;
  - documentation of determination of ineligibility for assistance when assistance is denied. Documentation must include the reason for the determination of ineligibility;
  - copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by Program Participants;
  - documentation of the monthly allowance for utilities used to determine compliance with the rent restriction;
  - documentation that the Dwelling Unit for Program Participants receiving rental assistance complies with the Housing Standards in this Chapter, relating to Homelessness Programs; and
  - documentation of U.S. Citizen, U.S. National, or Qualified Alien status for each household member receiving direct assistance, including:
    - verification of eligible immigration or citizenship status consistent with §1.410 of this title;
    - any determinations of ineligibility or mixed Household status; and
    - records of proration calculations applied under subsection (h)(2) of this section, if applicable.
- ❖ Implementation of HHSP activities involving direct assistance to Program Participants is subject to §1.410 of this title, relating to Determination of Alien Status for Program Beneficiaries.

- Each Household member receiving direct assistance under Homeless Prevention or Homeless Assistance must be verified for eligibility in accordance with §1.410 of this title (relating to Determination of Alien Status for Program Beneficiaries) prior to receiving assistance.
- Direct assistance may be prorated utilizing a fraction based on Household eligibility, calculated by multiplying the full benefit amount by a fraction in which the numerator is the number of eligible Household members, and the denominator is the total number of Household members.
- Activities that do not provide direct housing or financial assistance, such as Emergency Shelter, case management, and Street Outreach, and in-kind disaster relief are not subject to paragraphs (1) and (2) of this subsection.
- Populations that are documented by the Administrator as covered by the Violence Against Women Act (VAWA) or the Family Violence Prevention and Services Act (FVPSA) are excepted from having verification under this rule performed, unless required to do so under federal guidance.
- Administrators must include in their operational processes a means by which a household may appeal a determination of their eligibility under this subsection.

- ❖ **Budget Revisions** - Budget revisions can be requested to transfer funds between existing budget line items, but not between components.
- ❖ **Eligibility & Rental Assistance Guidelines** - Applicant must provide direct services to homeless individuals and families or individuals and families at-risk of homelessness. Applicant is required to verify each client's eligibility status. Applicants who apply to provide Rental Assistance will be required to conduct inspections of housing units for compliance with Housing Standards, Lead-Based Paint requirement Standards, Fair Market Rent and Rent Reasonableness Standards.
- ❖ **HMIS Participation** - Applicants for HHSP are required to participate and enter their data in the El Paso Homeless Management Information System (HMIS), if applicable. Refer to the local requirements section of this document for detailed HMIS participation requirements.
- ❖ **El Paso Helps** – HHSP services must align with and compliment El Paso Helps, the City-led initiative to coordinate street outreach and other services for vulnerable populations. This includes collaboration with the El Paso Helps partners during the collaborative meetings.

# Program Implementation Eligibility Requirements

## Federal, State, & Local Requirements

### Local Authority to Establish Additional Requirements

DCHD has the authority to establish local funding guidelines in addition to federal and state requirements. These local requirements, including Policies and Procedures, are developed by DCHD staff and approved by City Council to ensure that funding allocations align with community needs, promote financial responsibility, and enhance the effectiveness of funded programs.

Organizations and clients who apply for funding must meet all applicable federal, state, and local eligibility requirements. Federal requirements are determined by HUD, state requirements are established by TDHCA, while local guidelines, including Policies and Procedures, are developed by DCHD staff and approved by City Council.

### Agency Credit Score Requirement

Applicants consent to an evaluation of past grant performance conducted by DCHD through the Department's Agency Credit Score review process. The evaluation may include review of:

- ❖ Financial and administrative capacity
- ❖ Compliance with prior funding agreements and program requirements
- ❖ Timeliness and accuracy of reporting and reimbursement submissions
- ❖ Monitoring findings, corrective actions, and contract performance history
- ❖ Overall program performance and effectiveness

The Agency Credit Score may be considered in funding recommendations, risk assessment, monitoring determinations, contract decisions, contract renewal, and overall funding eligibility. This process supports responsible financial stewardship and compliance with applicable federal, state, and local requirements.

### Acceptance of Grant Conditions & Terms

Applicants must submit an Acceptance of Grant Conditions and Terms form, signed by an authorized representative of the applicant, with their application.

### Administrative Capacity

Applicants must demonstrate administrative and financial capacity to fully operate the project during the application process. A certified audit covering a period that ends after January 31 of the previous application year must be submitted when applying for the current year. This requirement may be waived for organizations or entities that expend less

than \$1,000,000 in federal funds for the audited year, however, they must submit alternative financial documentation demonstrating fiscal responsibility and financial capacity. Acceptable documentation may include:

- ❖ An independent external audit
- ❖ The most recently filed IRS Form 990 with supporting financial statements
- ❖ Year-end balance sheet and profit and loss statements
- ❖ Other financial documentation requested by DCHD

Awarded funds are distributed on a reimbursement basis. All agencies, except City Departments receiving funds, must demonstrate the financial capacity to cover project-related costs, including design, construction, and/or operations, for at least three months prior to reimbursement.

### **CDBG Public Services, HOPWA, ESG, and HHSP Minimum Requirements**

The minimum funding amount for a Services project is \$100,000, though lower-budget projects may be made eligible at the discretion of the Director of DCHD to maximize community impact and ensure timely expenditure of HUD funds.

### **CDBG Public Facilities Minimum Requirements**

The minimum funding amount for a Public Facilities project is \$1,000,000, though lower-budget projects may be made eligible at the discretion of the Director of DCHD to maximize community impact and ensure timely expenditure of HUD funds.

### **CDBG Volunteer Housing Rehabilitation Minimum Requirements**

The minimum funding amount for a Volunteer Housing Rehabilitation project is \$200,000, though lower-budget projects may be made eligible at the discretion of the Director of DCHD to maximize community impact and ensure timely expenditure of HUD funds.

### **Certificate of Account Status**

Applicants must provide a current Certificate of Account Status from the Texas Comptroller of Public Accounts confirming the organization is authorized to conduct business in the State of Texas and is in good standing for state tax purposes. This must be current at the time of submission of the LOI/application, and through the duration of the agreement.

This document is separate from formation documents filed with the Texas Secretary of State, such as a Certificate of Formation or Certificate of Filing.

## **Completeness Check**

Applications and supporting documentation must be submitted by the respective deadline to be considered for funding. All required supporting documents must be included for an application to be considered complete.

## **Compliance with Existing Contracts**

Applicants currently receiving federal funds administered by the DCHD and applying for additional funds must:

- ❖ Be in full compliance with their current contract terms.
- ❖ Have no outstanding audit or monitoring findings as determined by the City or HUD.
  - Should outstanding audit or monitoring findings not be resolved by the new contract service period, DCHD reserves the right to withdraw the tentative award.
- ❖ Maintain good standing throughout the entire program year.

## **Contract Amendments**

- ❖ Amendments will not be allowed within 45 days of the contract's expiration date unless an exception is granted by the DCHD Director.
- ❖ Requests for contract amendments must be submitted in writing on agency letterhead, signed by an authorized signatory, and include a detailed explanation of the circumstances requiring the amendment.
- ❖ Amendments are only considered for circumstances beyond the subrecipient's control, such as natural disasters, government orders, civil unrest, or other extraordinary events. General economic conditions or unanticipated difficulties do not qualify.

## **Contract Execution Readiness**

Subrecipients must submit all required documentation for contract execution before the start of the program year (typically September 1) or as determined by the DCHD. Failure to meet this requirement:

- ❖ Will not justify an extension of the contract term.
- ❖ May result in the cancellation, reallocation, or delay of funding.
- ❖ Will impact Agency Credit Score.
- ❖ Will impact future award eligibility.

DCHD reserves the right to adjust, defer, defund, or reallocate funding based on project readiness and program needs. Subrecipients must be prepared to execute their contracts as soon as DCHD is ready to proceed with funding to avoid delays.

Required documentation may include, but is not limited to:

- ❖ Applicable insurance policies
- ❖ A finalized budget and scope of work
- ❖ Mode of securing the funding – if applicable
- ❖ Lien documentation – if applicable
- ❖ Timely submission of signatures and other required documentation
- ❖ Letter of Intent specifying terms of the agreement - if applicable

This policy ensures flexibility for DCHD while reinforcing the need for agencies and developers to be ready to execute when funding becomes available.

## **Ordinance 9779 – Non-Discrimination Against Persons with Disabilities**

All facilities receiving funding from the City must comply with Ordinance 9779, ensuring accessibility for individuals with disabilities. Facilities must be accessible for both employment and service purposes or have an approved transition plan before funding approval.

Applicants must submit the following:

- ❖ **Letter of Assurance** - A written commitment confirming that programs, services, and facilities comply with accessibility and nondiscrimination requirements. Not a certification, signing indicates a promise to comply and take corrective action when needed.
- ❖ **ADA Self-Evaluation** - An internal review of policies, practices, programs, and facilities to ensure accessibility and nondiscrimination. Must document evaluation of policies and modifications to correct noncompliance, and corrective actions.

For projects with multiple service locations, a Letter of Assurance and ADA Self-Evaluation must be provided for each site.

## **Relocation Assistance**

In accordance with the City's Anti-Displacement Strategy, projects should avoid displacing low- and moderate-income tenants. If displacement is unavoidable, affected tenants must receive financial and advisory benefits as detailed in the Anti-Displacement Strategy.

Applicants should consult with DCHD staff if displacement or relocation will occur to ensure compliance and to allocate appropriate funds.

## **Suspension of Eligibility to Apply**

An entity whose contract with the City for HUD funding is terminated for cause will be ineligible to apply for HUD funding through the City of El Paso for 24 months from the termination date.

## **Site Suitability**

Applicants must ensure that their project location is appropriately zoned for the proposed activities at the time of application or LOI submission, and throughout the service period.

A Zoning Verification Letter from the City of El Paso's Planning and Inspections Department is required at the time of application.

The letter must be issued within five years of the program year start date and be accompanied by a signed cover letter certifying no substantial changes have occurred.

If zoning compliance is in progress, applicants may submit a written workout plan. However, compliance must be achieved before the City Council public hearing introducing the Draft Annual Action Plan.

For projects with multiple service locations:

- ❖ A single letter covering all locations or individual letters for each site will be accepted.
- ❖ Projects that relocate must obtain a new zoning compliance letter.
- ❖ Projects in public schools or City Parks Department facilities are exempt from this requirement.

Failure to meet this requirement will trigger the submission of a remediation plan detailing strategies to return the program to compliance. Continued non-compliance may result in additional monitoring, reimbursement review, funding reductions, or contract termination.

Subrecipients failing to fully expend awarded funds before the contract expiration date may negatively impact the agency's Agency Credit score and future funding eligibility with DCHD.

### **Insurance Coverage**

Subrecipients of City of El Paso HUD and TDHCA funding must maintain the following insurance coverage throughout the contracted period of performance:

- ❖ Workers' Compensation Insurance with a minimum coverage of \$1,000,000
- ❖ General Liability Insurance, including a Certificate of Liability Insurance listing the City of El Paso as an additional insured
- ❖ Automobile Insurance, if employees drive for work-related purpose

### **Performance Outcomes**

The DCHD has implemented a performance measurement system aligned with HUD's Outcome Performance Measurement System to assess the success of awarded projects and report accomplishments at the national level. Additionally, TDHCA grants may also require similar outcome reporting to evaluate project effectiveness and ensure compliance with state funding requirements.

Applicants are required to:

- ❖ Define measurable outcomes that demonstrate the impact and benefits of their projects.
- ❖ Submit a statement explaining the expected outcomes of their projects in their application.

- ❖ Describe the project’s impact on individuals, families, organizations, and communities, whether through construction, program participation, or service delivery.

Outcomes should reflect the direct benefits resulting from the project and contribute to HUD’s, TDHCA’s, and DCHD’s broader performance reporting requirements.

## **Timeliness Requirements**

Subrecipients of CDBG Public Services, ESG, HOPWA, HHSP, and other federal or state funding programs are expected to maintain spending levels reasonably consistent with the agreement timeline. During the first three months of the service period, subrecipients should maintain a spend-to-time ratio no lower than negative 10%. After the initial three-month period, spending should generally align with the percentage of time elapsed within the agreement period.

## **Federal & State Requirements**

### **Americans with Disabilities Act (ADA) and Historic Preservation**

Applicants must comply with all applicable federal, state, and local requirements related to the Americans with Disabilities Act (ADA), accessibility standards, historic preservation, and all applicable City codes and ordinances.

### **Authority to Apply**

Applicants must certify that they have the legal authority to submit the application and enter into a funding agreement, if awarded. Applicants must provide supporting documentation demonstrating such authority, including applicable Board approval, resolution, minute action, or other official authorization identifying the authorized representative.

### **Authorized Signatory**

Applicants must submit approved documentation (e.g., Board minute action or letter) certifying the individual authorized to sign contracts on behalf of the organization.

### **Conflict of Interest**

Conflict of Interest regulations are governed by local policies, specific grant requirements, and federal regulations (2 CFR 200.112). Applicants must disclose potential conflicts in writing, detailing the nature of the conflict and requesting a resolution.

If a conflict of interest is discovered after funding has been awarded or during the contract period:

- ❖ The subrecipient must promptly notify DCHD in writing, outlining the details of the conflict.
- ❖ DCHD will evaluate the conflict to determine if it affects the integrity of the funded program.
- ❖ Depending on the severity, DCHD may:

- Require recusal of the individual from decision-making related to the grant.
- Implement additional oversight or restrictions to mitigate risk.
- Seek legal or HUD guidance if necessary.
- ❖ If the conflict compromises program integrity, DCHD may take corrective measures, including modifying, suspending, or terminating funding.
- ❖ In some instances, exceptions may be granted if the conflict is deemed manageable and does not violate governing laws or regulations.

Ensuring transparency and timely action helps protect funding integrity and compliance with HUD, TDHCA, and local regulations.

## **Environmental Review**

All projects and activities funded in whole or in part with HUD funding are subject to applicable environmental review requirements under 24 CFR Part 58 and other related federal authorities. Environmental review requirements are intended to ensure that federally funded activities consider potential impacts to the human environment, public health and safety, historic resources, floodplains, wetlands, noise exposure, hazardous materials, and other environmental factors prior to the commitment of funds or commencement of physical activities.

The City of El Paso, acting as the Responsible Entity and jurisdiction responsible for carrying out the environmental review process under 24 CFR Part 58, is responsible for completing the environmental review process for applicable HUD-funded activities. As part of this process, DCHD will determine the appropriate level of environmental review required based on the scope, location, and nature of the proposed activity. Depending on the activity, projects may be classified as Exempt, Categorically Excluded Subject to (or not subject to) §58.5, Environmental Assessment (EA), or Environmental Impact Statement (EIS).

**Applicants, subrecipients, developers, contractors, and project partners must not undertake or authorize any choice-limiting actions prior to the completion of the environmental review process and formal authorization from DCHD to proceed.**

Choice-limiting actions are activities that could restrict the consideration of reasonable alternatives or otherwise predetermine the outcome of the environmental review process. Prohibited activities prior to environmental clearance may include, but are not limited to:

Executing binding construction contracts

- ❖ Beginning rehabilitation, demolition, site work, or construction activities
- ❖ Acquiring property without appropriate environmental review clearance and required protections
- ❖ Committing or expending HUD funds on non-exempt activities
- ❖ Requesting reimbursement or drawdown of HUD funds from the City of El Paso prior to completion of the required environmental review and authorization to proceed
- ❖ Entering into agreements or taking actions that legally commit the project prior to environmental clearance

- ❖ Undertaking physical activities that may have an adverse environmental impact or limit environmental review alternatives

Environmental clearance must be completed before the commitment of HUD funds and prior to the commencement of any non-exempt choice-limiting activity. Costs incurred prior to environmental clearance may be deemed ineligible and may not be reimbursed with HUD funds.

Certain administrative, planning, or predevelopment activities may be allowable prior to environmental clearance if they do not constitute a choice-limiting action under HUD regulations. However, applicants must coordinate with DCHD prior to undertaking any activity associated with a proposed HUD-funded project to ensure compliance with environmental review requirements.

Applicants may be required to submit environmental documentation requested by DCHD to facilitate the environmental review process. Such documentation may include, but is not limited to:

- ❖ Site maps, legal descriptions, photographs, and project narratives
- ❖ Environmental questionnaires or checklists
- ❖ Information related to previous site uses or known environmental concerns
- ❖ Historic preservation documentation
- ❖ Floodplain, wetland, or flood insurance information
- ❖ Phase I Environmental Site Assessments, surveys, studies, or reports, if applicable

Environmental review timelines vary depending on the type, scope, and location of the project. Applicants should account for environmental review requirements when planning project schedules, procurement activities, construction timelines, and funding commitments.

Completion of the environmental review process does not eliminate the requirement to comply with all other applicable federal, state, and local environmental laws, regulations, permits, and approvals. Failure to comply with environmental review requirements may result in project delays, suspension of activities, cancellation of funding, repayment of funds, or other corrective actions required by HUD or the City of El Paso.

### **Employer Identification Number (EIN)**

Applicants must provide a Federal Tax ID Number (EIN) required for tax reporting, hiring employees, opening a bank account, and applying for business licenses and permits.

### **Fair Housing Act Compliance**

Applicants must comply with:

- ❖ The Fair Housing Act
- ❖ Executive Order 11063 (Equal Opportunity in Housing)
- ❖ The Civil Rights Act of 1964
- ❖ The Age Discrimination Act of 1975
- ❖ Section 504 of the Rehabilitation Act of 1973

- ❖ Americans with Disabilities Act (ADA) Title II

## **Faith-Based Organizations**

Faith-based organizations applying for funding must comply with HUD's Final Rule (effective October 30, 2003, as amended).

## **Households and Persons Served**

Applicants must provide the number of households and persons served under each awarded program or project.

For programs serving homeless individuals, applicants must also collect race, ethnicity, and age data to facilitate analysis of disparities and promote equitable service delivery.

## **Lobbying Restrictions**

Under Section 1352, Title 31, U.S. Code, federal funds may not be used to influence:

- ❖ Any federal agency employee or officer
- ❖ A member of Congress or their staff
- ❖ Any federal contract, grant, loan, or cooperative agreement
- ❖ If non-federal funds are used for lobbying, applicants must complete and submit Standard Form (Disclosure Form to Report Lobbying).

## **Homeless Management Information System (HMIS) Participation**

Applicants whose programs serve the homeless population through ESG or HHSP must fully participate in the Homeless Management Information System (HMIS) for the full term of their agreement and required by CFR and §10 TAC 7.6.

The City will verify compliance in consultation with the HMIS Lead Entity. Data on all individuals served must be entered into the appropriate HMIS or an HMIS-comparable database for domestic violence and legal service providers.

## **Indirect Costs Allowance**

Under 2 CFR § 200.56, Indirect (Facilities & Administrative) Costs are defined as costs that are incurred for a common or joint purpose and cannot be readily assigned to a specific project, activity, or cost objective without considerable effort.

These costs typically include:

- ❖ General administration (e.g., accounting, legal, human resources)
- ❖ Office space rent and utilities
- ❖ IT support and maintenance
- ❖ Depreciation of buildings and equipment
- ❖ Other overhead expenses not directly tied to a single program or project

Applicants may include Indirect Costs in program budgets using one of the following methods:

## **De Minimis Rate**

- ❖ If awarded funding, agencies may apply 15% of total expenses per monthly reimbursement request.
- ❖ Agencies using this method must submit a signed memo from their authorized signatory confirming their intent to apply the 15% De Minimis Rate for the grant year.

## **Indirect Cost Allocation Plan**

- ❖ Agencies must submit a current Indirect Cost Agreement from their cognizant federal agency.
- ❖ The agreement must specify the applicable indirect cost rate for reimbursement.

## **Indirect Costs and Modified Total Direct Cost (MTDC)**

The requirements of 2 CFR Part 200, as amended, apply to federally funded programs administered by DCHD.

Per 2 CFR § 200.68, Modified Total Direct Cost (MTDC) includes direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and the first \$25,000 of each subaward. Certain costs are excluded from the MTDC base, including client assistance costs and other excluded categories identified under federal regulations.

Client assistance costs, including rental assistance, utility payments, direct financial assistance, and security deposits, must not be included in the MTDC base when calculating indirect costs.

Per 2 CFR § 200.414, indirect costs are costs incurred for common or joint purposes that cannot be readily identified with a single program or activity. Indirect costs may only be applied to eligible MTDC expenses and must not be charged to excluded client assistance costs, regardless of whether the organization has a federally approved Negotiated Indirect Cost Rate Agreement (NICRA).

Subrecipients are responsible for ensuring indirect cost calculations comply with all applicable federal requirements and cost principles.

## **Indirect Cost Limitations**

Certain costs are excluded from the Modified Total Direct Cost (MTDC) base under 2 CFR Part 200 and may not be used when calculating indirect costs. Excluded costs include client assistance expenses such as rental assistance, utility payments, direct financial assistance, and security deposits.

Indirect costs may only be applied to eligible MTDC expenses, even when an agency has a federally approved indirect cost rate agreement or elects to use the De Minimis Rate.

Applicants and subrecipients are responsible for ensuring indirect costs are calculated in accordance with applicable federal cost principles and regulations.

## **Jurisdiction Requirements**

Programs, clients, and/or improvements funded by CDBG, HOME, ESG, or HHSP, must be within the city limits City of El Paso. HOPWA-funded subsidized housing must be within City of El Paso city limits, while case management can include County of El Paso Residents.

## **Procurement Guidelines**

Applicants must follow all applicable local, state and federal procurement requirements when purchasing services, supplies, materials, or equipment with DCHD-awarded funding. Applicable federal regulations are contained in 2 CFR Part §200.320 Procurement Methods, Chapter 252 of the Texas Administrative Code, and City of El Paso local requirements. In addition, applicants are expected to maintain internal Procurement Policies and Procedures that are followed within their organization.

## **Public Services**

To provide or apply for a Public Service Program, the applicant must be a public agency or nonprofit organization.

## **Housing Activities**

Programs that assist individuals and households, including:

- ❖ Homeowner rehabilitation
- ❖ Rental housing assistance
- ❖ Lead-based paint hazard reduction

## **Race and Ethnicity Data Collection Requirement for CDBG**

Programs funded with Community Development Block Grant (CDBG) funds may be required to collect and maintain race and ethnicity demographic information for beneficiaries served, in accordance with HUD reporting requirements and federal nondiscrimination regulations.

Subrecipients must collect, maintain, and report beneficiary demographic data, including race and ethnicity information, for applicable CDBG-funded activities and service categories as required by DCHD and HUD. Documentation must be maintained in the program file and made available for monitoring, reporting, or audit purposes upon request.

## **Verification of Non-Profit Status**

Non-profit agencies must submit documentation verifying active non-profit status at the inception of the NOFA process, including:

- ❖ The IRS determination letter confirming 501(c)(3) tax-exempt status.
- ❖ A completed and signed Assurance of Applicant Eligibility for Non-Profit Organizations, if required by DCHD.

## Unique Entity ID & System of Award Management (SAM) Verification

Applicants must provide their Unique Entity ID and SAM.gov record status to confirm eligibility and debarment status before funding consideration, and throughout the service period DCHD will recertify compliance before executing any contract. Agency may not be federally suspended, excluded, or debarred.

## Application Cycle

The Department of Community and Human Development (DCHD) serves as the grantee and administrator for funding received from the U.S. Department of Housing and Urban Development (HUD), the Texas Department of Housing and Community Affairs (TDHCA), and other applicable funding sources.

Organizations seeking funding through DCHD programs must also meet all applicable federal, state, and local eligibility requirements. Applicants should also demonstrate how the proposed program or project aligns with identified community needs and applicable funding priorities.

Information related to the City's Consolidated Needs Assessment (CNA), Consolidated Plan (ConPlan), and Annual Action Plan is available for public review at:

<https://www.elpasotexas.gov/community-and-human-development/nofa-forms-and-notice/>

The City's Strategic Plan can be accessed at:

<https://www.elpasotexas.gov/government/strategic-planning>

These documents collectively outline the City's housing and community development priorities, funding strategies, and annual implementation activities.

## DCHD Funding Administration

DCHD is responsible for administering subrecipient funds and for ensuring compliance with applicable federal, state and local requirements, as well as the policies and procedures outlined in this document.

Funding recommendations and allocations are based on available funding, community needs, program performance, and applicable regulations. Funding amounts are projections and may be adjusted by DCHD as necessary to comply with funding requirements or program priorities.

The DCHD Director may approve administrative exceptions to these policies and procedures when permitted under applicable regulations.

## Multi-Year Funding Cycles

### Three Year Cycle

Beginning in FY 2027, Public Services and Public Facilities projects will operate on a three-year funding cycle to support long-term planning, program stability, and effective use of funds.

For Public Services programs, continuation of funding beyond the initial year is contingent upon:

- ❖ Availability of funding from the awarding agency
- ❖ Satisfactory program performance
- ❖ Timely expenditure of funds
- ❖ Compliance with applicable requirements

Programs that do not meet performance or spending expectations may be reduced, discontinued, or determined ineligible for renewal funding. Additional program-specific requirements, deadlines, application instructions, and scoring criteria will be published in the applicable Notice of Funding Availability (NOFA) for each funding opportunity. Applicants should carefully review the NOFA that applies to their proposed program or project.

## Tentative Application Timeline

DCHD publishes a Tentative Application Timeline annually for each funding cycle. The timeline identifies anticipated application and funding-related activities that occur throughout the planning and funding process. Applicants should refer to the applicable NOFA and DCHD communications for specific dates and updates. Dates are subject to change.

Phase	Description
<p style="text-align: center;"><b>Community Needs Assessment/Planning</b></p>	<p>DCHD reviews community needs and funding priorities for the upcoming program year (done as needed).</p>
<p style="text-align: center;"><b>NOFA Release</b></p>	<p>DCHD releases the applicable NOFA and application instructions.</p>
<p style="text-align: center;"><b>Pre-Application Workshop/Training/Technical Assistance</b></p>	<p>DCHD may offer optional information workshops, office hours, or technical assistance opportunities for prospective applicants.</p>

<b>Letter of Intent (LOI) Submission Period</b>	Applicants submit a Letter of Intent (LOI) for DCHD to review basic eligibility of potential applicant.
<b>LOI Eligibility Review</b>	DCHD reviews LOIs to determine whether proposed activities may proceed to the full application phase.
<b>Eligibility Notification</b>	Applicants are notified whether they are eligible to submit a full application.
<b>Application Mandatory Training</b>	Applicants must attend the mandatory application training to be eligible to apply for funding. Failure to attend will result in the application not being accepted for review.
<b>Full Application Submission</b>	Eligible applicants submit the full application and required attachments.
<b>Application Review and Scoring</b>	Technical Advisory Review Panel (TARP) review applications submitted.
<b>Preliminary Score Notification</b>	Applicants are notified of preliminary scores (application score + agency credit score) and next steps, if applicable.
<b>Oral Presentations, if applicable</b>	Selected applicants may present their proposal and answer questions from reviewer(s). The oral presentation must be directly based on the original application submission. No additional information may be presented.
<b>Final Funding Recommendation</b>	DCHD develops funding recommendations based on scores, community needs, funding availability, and regulatory requirements.
<b>City Council Approval</b>	Final funding recommendations are presented to City Council for approval.
<b>Contracting</b>	Approved applicants complete contract requirements prior to the start of funding.

## Technical Advisory Review Panel (TARP)

Applications will be evaluated by a Technical Advisory Review Panel (TARP) consisting of DCHD staff, City staff, and/or subject matter experts. The panel is to ensure a fair, transparent, and consistent evaluation of all applications submitted for funding under the City's Programs. The TARP shall evaluate applications based on published criteria, applicable federal requirements, and the goals and priorities identified in the City's Consolidated Plan.

Panel members are selected based on professional expertise and neutrality for each funding cycle. All reviewers are required to complete conflict of interest disclosures prior to participating in the review process.

## Agency Credit Score

DCHD utilizes an Agency Credit Score to evaluate the past performance of previously funded agencies. The score is intended to measure an agency's overall reliability, compliance, responsiveness, and ability to successfully administer funded programs. Agency Credit Scores are developed following the completion of a program year and are considered as part of future funding evaluations. Scores are available upon request by contacting DCHD. The Agency Credit Score is based on a 500-point scale and the following factors:

- ❖ Timeliness, completeness, and accuracy of programmatic and fiscal reporting, including reimbursement requests
- ❖ Responsiveness to DCHD requests, communications, and monitoring activities
- ❖ Budget management and the ability to operate programs within approved budgets
- ❖ Compliance history, including any monitoring findings or unresolved concerns
- ❖ Program performance, including achievement of proposed outcomes and expenditure rates
- ❖ Contract execution and overall implementation of funded activities

Agency Credit Scores are based on the overall performance of previously funded projects administered under the same organization. In determining whether multiple organizations, entities, or programs will be treated as a single agency for purposes of evaluating performance history and applying an Agency Credit Score, DCHD considers factors including, but not limited to:

- ❖ Unique Entity ID (UEI)
- ❖ Employer Identification Number (EIN)
- ❖ Organizational leadership
- ❖ Shared administrators or decision-makers
- ❖ Corporate or organizational structure

Organizations operating under multiple names, affiliated entities, or substantially similar leadership or management structures may be evaluated as a single agency for purposes of

determining performance history and Agency Credit Score applicability. This process is intended to promote accountability, protect public funds, and support fair and consistent funding decisions.

### **Agency Credit Score and Semi-Automatic Renewal Process**

The Agency Credit Score will be used annually to quantify past performance based on the most recently completed program year. This score serves as a key metric in evaluating an agency's effectiveness and accountability.

The Agency Credit Score will also play a role in determining eligibility for semi-automatic funding renewals each year. However, since the first year in the new cycle will not be fully completed at the time funding decisions must be made for the following year, an alternative approach will be applied to ensure fair and consistent evaluations.

For programs eligible for semi-automatic renewal, the following standards must apply:

- ❖ **Annual-Performance-Requirement** To qualify for continued funding, an agency must have achieved a minimum Credit Score of 350 out of 500 (70%) for the most recently completed program year.
- ❖ **Mid-Year-Performance-Check** - Agencies must meet a 50% threshold for both spending and programmatic goals for all programs currently funded by the six-month mark of the current funding year.

These measures ensure that agencies receiving ongoing support maintain strong performance and demonstrate progress toward their programmatic and financial commitments.

### **Agency Credit Scoring for Overdue or Open Projects**

Agencies with projects that remain open beyond their scheduled or anticipated completion date shall still be subject to evaluation under the Agency Credit Score process. In such cases, performance shall be assessed based on all available programmatic, fiscal, and compliance data associated with the most recently completed program year and/or the most recent substantially completed period of performance. The existence of an open or delayed project shall not exempt an agency from scoring consideration.

DCHD shall assign an Agency Credit Score based on documented performance, including timeliness, expenditure rates, compliance with contractual requirements, responsiveness to Department requests, and achievement of approved program outcomes. Where a project remains open due to delays, extensions, or incomplete closeout, DCHD may consider such factors in the scoring determination, including any history of late closeouts or outstanding compliance issues.

This process is intended to ensure that agencies are evaluated consistently based on performance and accountability, regardless of project closeout status.

## **Key Requirements**

The full application packets, including all required attachments, will be provided to those programs deemed eligible to apply after submission of the LOI. The City of El Paso has a fiscal responsibility to ensure that subrecipients selected for funding abide by all rules and regulations established by the Federal government and that they are complying for the entirety of their funding cycles, as this will have a direct effect on the total Federal funds received by the City.

Unless otherwise stated in the applicable NOFA, the following process generally applies to Public Services, Public Facilities, Volunteer Housing Rehabilitation, ESG, HOPWA, HHSP and other local funding opportunities.

## **Application Review and Funding Process**

### **Step 1: Pre-Application Training Workshop**

Prior to the Letter of Intent (LOI) submission period, DCHD will conduct a Pre-Application Training Workshop for organizations interested in applying for funding.

The purpose of the workshop is to provide prospective applicants with general information regarding available funding opportunities, eligibility requirements, program expectations, application procedures, and applicable federal, state, and local requirements.

The workshop may also provide an opportunity for applicants to:

- ❖ Ask questions regarding funding opportunities and eligibility
- ❖ Receive general technical assistance related to the application process
- ❖ Better understand program requirements and funding priorities
- ❖ Determine whether a proposed program or project is an appropriate fit for the funding opportunity prior to submitting an LOI

Participation in the workshop is encouraged but is not required unless otherwise stated in the applicable NOFA. DCHD may conduct workshops in person, virtually, or through other formats determined appropriate by DCHD.

### **Step 2: Letter of Intent (LOI) Submission and Eligibility Review**

The LOI is required before submission of a full application. The purpose of the LOI is to assist DCHD in determining whether a proposed program or project is eligible under the applicable funding source before the applicant invests time in preparing a full application.

Applicants submit an LOI describing the proposed program or project. DCHD reviews the LOI to determine whether the proposal is eligible to proceed to the full application stage.

LOI review will include consideration of:

- ❖ Eligible applicant type (i.e. nonprofit organization under specific funding sources)
- ❖ Eligible activities or services is meeting a community need identified in the most current Community Need Assessment (CNA)
- ❖ Eligible population to be served
- ❖ Alignment with funding priorities
- ❖ Basic project or program feasibility
- ❖ Compliance with applicable federal, state, and local requirements

Submission of an LOI does not guarantee funding or approval to submit a full application. It only determines whether the proposal may proceed to the next phase of the process.

Once notified whether the project is eligible, applicants may submit a written appeal within three (3) working days of receiving notification. Please reference the appeals section of this document for specific details.

### **Step 3: Full Application Submission**

Eligible applicants submit the full application and all required documentation by the published deadline.

### **Step 4: Application Review and Scoring**

Applications are reviewed for completeness, eligibility, program quality, community impact, budget reasonableness, feasibility, and compliance with applicable requirements.

Each TARP member assigns an individual Application Score to each program application. An overall Application Score is then calculated by averaging the individual scores assigned by all TARP members.

### **Step 5: Preliminary Score Notification**

Both the Agency Credit Score and the Application Score will be utilized to determine a Preliminary Application Score. The Agency Credit Score may result in the deduction of points on the Application Score using the scale below. Applicants

without an applicable Agency Credit Score will be evaluated based solely on the Application Score.

Evaluation Scale	
500: Maximum Total Score	
Credit Score	Score Card Deduction (-) Points
450-500	0
400-449	5
350-399	10
300-349	15
250-299	20
200-249	25
150-199	30
0-149	35
This tool will not be used for new agencies (or certain questions will not be applied) Tool will be used to adjust application score card.	

Applicants are notified of their preliminary scores. For service projects, agencies receiving a preliminary score of 75% or higher advance to the oral presentation phase of the process. All facilities applicants are invited to participate in the oral presentation phase.

### Step 6: Oral Presentations, if applicable

Invited applicants provide an oral presentation and respond to questions from the TARP review panel.

After oral presentations, TARP may revise their scores based on the presentation. If any scores are adjusted, the final applicant score is re-averaged and used as a basis for DCHD’s funding recommendation.

### Step 7: Final Scoring and Funding Recommendations

DCHD staff and leadership review the final application rankings and develop funding recommendations for presentation to City Council. The recommendation incorporates:

- ❖ Score rankings
- ❖ Community needs
- ❖ Regulatory requirements (e.g., ESG funding limitations)

Applicants are notified of the final funding recommendation via email once the review process is complete, and full scoring details are available upon request once all recommendation letters are delivered.

### Step 8: City Council Approval

Funding recommendations for HUD and TDHCA are presented to City Council for approval. Funding is not final until approved by City Council and, when applicable, the federal or state funding agency. Final funding recommendations are approved by HUD and TDHCA.

## **Exit Conference**

Applicants not recommended for funding may request a Technical Assistance Exit Conference with DCHD.

The purpose of the conference is to provide constructive feedback regarding the application and discuss opportunities to strengthen future submissions. Topics may include:

- ❖ Program design
- ❖ Application quality
- ❖ Compliance considerations
- ❖ Funding priorities
- ❖ Capacity-building opportunities

## **Appeal Process**

### **Appeal of Letter of Intent (LOI)**

Applicants may appeal a determination resulting from the review of their Letter of Intent (LOI) by submitting a written appeal to DCHD within three (3) working days of receipt of notification. Appeals submitted after the deadline will not be considered.

The appeal is limited to providing the applicant an opportunity to clearly state the basis for the appeal and demonstrate why the original determination was incorrect, based solely on the information submitted in the original LOI. No new, revised, or supplemental information may be submitted or considered.

All appeals must include:

- ❖ Identification of the specific determination or Reviewer Checklist item being challenged
- ❖ Reference to the applicable section(s) of the original LOI
- ❖ A clear explanation of how the submitted materials met the requirement

No additional documentation nor attachments will be accepted.

DCHD staff will review all timely appeals and issue a written determination within seven (7) working days from the date the written appeal is received by DCHD.

If an appeal is found to be valid, the determination will be corrected as appropriate. If denied, the applicant will receive a written explanation of the decision.

If the applicant disagrees with the appeal determination, the applicant may submit a written request for review to the DCHD Director. No new, revised, clarified, nor supplemental information shall be accepted or considered.

The Director's review shall not constitute a re-evaluation of the project proposal or submission of new information. The review shall be limited to determining whether an error, inconsistency, or deviation from established LOI review criteria or eligibility requirements occurred based solely on the original LOI submission, if applicable. The determination issued by the Director shall be final and not subject to further appeal or administrative review.

### **Appeal of Preliminary Score**

Applicants may appeal their Preliminary Score by submitting a written appeal to DCHD within three (3) working days of receipt of notification. Appeals submitted after the deadline will not be considered.

The appeal shall constitute a formal request for re-review of the application's original submission. The re-review shall be conducted in its entirety for the identified scoring category and shall be based strictly on the contents of the original application as submitted. The review shall not be limited to individual questions, isolated responses, or selectively identified portions of a category. No new, revised, clarified, or supplemental information may be submitted or considered.

No additional documentation nor attachments will be accepted.

Applicants are limited to one (1) appeal of the Preliminary Score. No additional or subsequent appeals, requests for reconsideration, or resubmissions will be accepted or considered after the initial appeal determination has been issued. The appeal determination shall constitute the final administrative action regarding the Preliminary Score. DCHD staff will review all timely appeals and issue a written determination within seven (7) working days from the date the written appeal is received by DCHD.

Following the appeal review of the preliminary scoring, the Department shall update the applicable score in accordance with the appeal determination, replacing the original score as appropriate. The revised score may result in either an increase or a decrease and shall be used for final ranking and funding determinations.

**Appeals shall only be permitted during the Letter of Interest (LOI) review and preliminary scoring stage of the competitive application process.**

**Upon completion of final scoring and funding recommendations, the competitive review process shall be considered administratively closed and final.** This limitation is necessary to ensure a fair and equitable competitive process, avoid delays in funding decisions and program implementation, maintain established application and review timelines, and preserve the integrity, consistency, and finality of funding recommendations and approval decisions.

## City Council

City Council retains the ultimate authority regarding funding for projects and programs covered by this document; however, HUD and TDHCA have final oversight and approval authority to ensure compliance with federal and state regulations. Funding recommendations initiated by DCHD staff are presented in draft form at a public hearing. In addition to this hearing, a 30-day public comment period allows the community to provide feedback, which is documented and considered for incorporation into the final Annual Action Plan submitted to HUD. The adopted Annual Action Plan must then be submitted to HUD 45 days before the start of the upcoming program year for final review and authorization.

For programs administered through TDHCA, DCHD submits a separate application to the funding agency in accordance with the applicable program requirements and deadlines. When awarded by TDHCA, City Council authorization is required for the City to enter into a contract with TDHCA.

## Annual and Monthly Reporting

### **Consolidated Annual Performance Evaluation Report (CAPER) Reporting**

DCHD shall prepare and submit the CAPER in accordance with HUD regulations, IDIS requirements, federal reporting guidance, and the CPP. The CAPER shall evaluate progress made toward the goals, objectives, priorities, and activities identified in the Consolidated Plan and Annual Action Plan during the applicable program year.

The CAPER may include, but is not limited to:

- ❖ Program accomplishments
- ❖ Expenditures and financial status
- ❖ Beneficiary and demographic data
- ❖ Performance outcomes
- ❖ Fair housing activities
- ❖ Homelessness activities
- ❖ Other information required by HUD

City of El Paso staff, subrecipients, and contractors shall cooperate in the collection, review, and submission of information necessary for completion of the CAPER.

DCHD shall prepare a Draft CAPER for public review prior to submission to HUD. A public notice announcing the availability of the Draft CAPER and public comment period shall be published in English and Spanish through methods determined appropriate by DCHD,

which may include the City website, newspaper publication, or other public notification methods consistent with the CPP.

The Draft CAPER shall be made available for public review for a minimum of fifteen (15) calendar days. During this period, members of the public may submit written comments, recommendations, or concerns regarding program performance, accomplishments, expenditures, and activities completed during the program year.

DCHD shall review and maintain all public comments received during the public comment period. Comments received may be incorporated into the final CAPER, when appropriate. A summary of public comments received, including comments not incorporated and the reason, may be maintained as part of the official CAPER record, when required by HUD.

The final CAPER shall be submitted to HUD no later than ninety (90) days following the end of the applicable program year, unless otherwise authorized or extended by HUD. DCHD may also present CAPER findings, accomplishments, and performance outcomes to City Council, advisory bodies, stakeholders, or the public, when applicable.

HUD periodically updates CAPER templates, IDIS reporting structures, and submission requirements. As a result, report formatting and organizational structure may vary between program years due to HUD system or template modifications.

DCHD shall maintain CAPER records and supporting documentation in accordance with applicable federal, state, and local record retention requirements.

## **HHSP Reporting Requirements**

DCHD shall prepare and submit all required HHSP reports in accordance with 10 TAC Chapter 7, TDHCA guidance, contract requirements, and reporting deadlines.

Required HHSP reporting may include Monthly Performance Reports (MPRs), Monthly Expenditure Reports (MERs), reimbursement requests, HMIS reporting, expenditure reporting, performance reporting, and other reports required by TDHCA.

Monthly reports shall be submitted through the Housing Contract System no later than the last day of the month for the preceding reporting period, unless otherwise directed by TDHCA.

DCHD divisions, program staff, fiscal staff, subrecipients, contractors, and partner agencies shall cooperate in the collection, review, reconciliation, and submission of information necessary for completion of HHSP reporting requirements.

TDHCA may periodically revise HHSP reporting templates, reporting systems, submission procedures, performance measures, or administrative requirements. As a result, reporting formats and requirements may vary between program years or contract periods.

Failure to submit required reports or supporting documentation in accordance with TDHCA requirements may result in delayed reimbursements, suspension of payments, corrective action, contract conditions, or other actions permitted by TDHCA.

DCHD shall maintain HHSP reporting records and supporting documentation in accordance with applicable TAC requirements, TDHCA guidance, contract requirements, and record retention requirements.

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# Glossary

**Agency Credit Score** – A score developed by DCHD to evaluate an agency’s past performance, including compliance, responsiveness, expenditure rates, and overall administration of previously funded programs.

**Annual Action Plan (AAP)** – The City’s one year HUD plan identifying projects, activities, and funding priorities for the program year.

**Application Score** – The score assigned to an application based on the evaluation criteria established in the applicable NOFA and review process.

**Area Median Income (AMI)** – The median household income for a geographic area as determined annually by HUD and used to establish income eligibility limits.

**At Risk of Homelessness** – A person or family who is at imminent risk of losing their housing but has not yet become homeless, as defined by applicable program regulations.

**Award Letter** – A written notice issued by DCHD informing an applicant of a funding recommendation or funding decision.

**Beneficiary** – An individual, household, or population that receives a direct benefit from a funded activity or program.

**Capital Improvement** – Physical improvements or construction activities involving public facilities, infrastructure, or buildings.

**Case Management** – A coordinated process used to assess client needs, develop service plans, and connect individuals or families to services and resources.

**Cash Match** – Non-federal funds contributed by an organization to support eligible program costs when required by the applicable funding source.

**Chronically Homeless** – A person with a qualifying disability who has been continuously homeless for at least 12 months or has experienced repeated episodes of homelessness over time, as defined by HUD.

**Community Development Block Grant (CDBG)** – A HUD entitlement grant program that provides funding for community development activities benefiting low and moderate-income persons.

**Community Needs Assessment (CNA)** – A study or planning document used to identify community needs and funding priorities through data analysis, public input, and stakeholder engagement.

**Comparable Database** – A system used by domestic violence service providers in place of HMIS to protect the confidentiality of client information.

**Conflict of Interest** – A situation in which an individual or organization involved in the funding, administration, review, or oversight process may receive a personal or financial benefit from a funding decision or activity.

**Consolidated Annual Performance and Evaluation Report (CAPER)** – The City's annual HUD report summarizing program accomplishments, expenditures, and progress toward Consolidated Plan goals.

**Consolidated Plan (Con Plan)** – The City's five year HUD strategic plan establishing housing and community development priorities and funding strategies.

**Continuum of Care (CoC)** – A regional or local planning body responsible for coordinating housing and services funding for individuals and families experiencing homelessness.

**Contract Term** – The approved period during which funded activities and expenditures may occur.

**Coordinated Entry System (CES)** – A standardized process used by the Continuum of Care to assess, prioritize, and refer individuals and families experiencing homelessness to housing and services.

**Department of Community and Human Development (DCHD)** – The City of El Paso department responsible for administering federal, state, and local community development and housing programs.

**Eligible Activity** – An activity permitted under the applicable funding source and program regulations.

**Emergency Shelter** – A temporary facility that provides housing and supportive services to individuals or families experiencing homelessness.

**Entitlement Grants** – Annual formula-based grants awarded by HUD to eligible local governments to support community development, housing, and public service activities.

**Environmental Review** – A federally required review process to evaluate the environmental impacts of proposed projects before funds may be committed or expended.

**Fair Housing** – The legal right to housing free from discrimination based on protected characteristics under federal, state, or local law.

**Funding Recommendation** – A proposed funding amount or activity recommendation developed through the review process and presented for approval consideration.

**Government Entity** – A public agency, department, political subdivision, or other governmental instrumentality, including school districts and housing authorities.

**Grant Agreement** – A legally binding agreement between DCHD and a funded agency outlining program requirements, funding conditions, and performance expectations.

**Homeless Management Information System (HMIS)** – A secure data system used to collect, manage, and report information on individuals and families receiving homeless assistance services.

**HOME Investment Partnerships Program (HOME)** – A HUD program providing funding for affordable housing activities, including rehabilitation, rental housing, and homeownership assistance.

**HOME-ARP** – HUD funding provided under the American Rescue Plan to address homelessness and housing instability.

**Housing First** – A homeless assistance approach focused on quickly placing individuals and families into permanent housing without unnecessary barriers or preconditions.

**Housing Opportunities for Persons With AIDS (HOPWA)** – A HUD program providing housing assistance and supportive services for persons living with HIV/AIDS and their families.

**Letter of Intent (LOI)** – A preliminary submission used by DCHD to determine whether an applicant meets basic eligibility requirements before being invited to submit a full application.

**Low-to-Moderate Income (LMI)** – Households or persons whose income does not exceed HUD-established income limits for the area.

**Match Requirement** – The amount or percentage of non-federal contributions required by a funding source to support a funded activity or program.

**Memorandum of Understanding (MOU)** – A written agreement outlining the roles and responsibilities between two or more parties working collaboratively on a program or activity.

**Monitoring** – Oversight activities conducted by DCHD to evaluate compliance with program requirements, financial management standards, and performance obligations.

**National Objective** – A federally required CDBG purpose that funded activities must meet, such as benefiting low-to-moderate income persons, preventing slum and blight, or addressing urgent community needs.

**Notice of Funding Availability (NOFA)** – A public notice issued by DCHD announcing the availability of funding, eligible activities, application requirements, and submission deadlines.

**Oral Presentation** – A presentation provided by invited applicants as part of the review process to further explain the proposed program, project, or application and respond to TARP questions.

**Permanent Supportive Housing (PSH)** – Long-term housing combined with supportive services for individuals or families experiencing chronic homelessness or disabilities.

**Preliminary Score** – The initial score assigned to an application during the review process before oral presentations or funding recommendations, if applicable.

**Program Income** – Gross income generated from the use of grant funds, as defined by the applicable funding regulations.

**Public Services** – Activities that provide direct services to individuals or households, such as homelessness services, childcare, food assistance, transportation, or mental health services.

**Rapid Re-Housing (RRH)** – Short-term financial assistance and case management services designed to quickly move individuals and families experiencing homelessness into permanent housing.

**Recipient** – The City of El Paso DCHD, which receives funds directly from HUD or another funding agency through an executed grant agreement.

**Reimbursement Request** – A request submitted by a subrecipient agency for repayment of eligible expenses incurred under an approved grant agreement.

**Scope of Work** – A detailed description of the activities, services, deliverables, and performance expectations under a funded project or program.

**Subrecipient Agency** – An agency that receives funding from the Recipient (DCHD) and provides eligible services, activities, or programs in accordance with the funding agreement.

**Supportive Services** – Services that assist individuals or families in achieving housing stability or improving quality of life, including case management, transportation, employment assistance, or behavioral health services.

**Technical Advisory Review Panel (TARP)** – A panel established by DCHD to review, evaluate, and score funding applications based on the criteria established in the applicable NOFA and review process.

**Texas Department of Housing and Community Affairs (TDHCA)** – The state agency responsible for administering various housing and community development programs in Texas.

**Unique Entity ID (UEI)** – A federally assigned identifier required for entities applying for or receiving federal funding.

**Very Low Income (VLI)** – Households whose income does not exceed 50% of Area Median Income, as defined by HUD.