

**CITY OF TUCSON – ESG-CV HOMELESSNESS PREVENTION  
EXHIBIT B – SCOPE OF WORK**

**APPLICANT RESPONSIBILITIES**

The project shall provide eligible homelessness prevention activities including rental assistance, housing stabilization and relocation financial assistance, housing stabilization and relocation services, essential services, and waiver-eligible services as defined in the Request for Proposals.

- Project must ensure all households meet eligibility requirements including income and homeless/at-risk of homelessness definition requirements prior to enrollment.
- Project shall retain and make available for City inspection eligibility paperwork, case plan and case management documentation, required inspections, tenant income certifications, tenant rental contribution schedules, and all other associated project records for a period of not less than five years following the performance period end date.
- Project must obtain an environmental review from the City of Tucson Housing and Community Development Department prior to the project start date.
- Homelessness prevention services must be provided in a rapid response model with project enrollment contact initiated within two business days of referral.
- Services must be low-barrier and may not require sobriety or participation in program activities other than monthly case management.
- Project must ensure safe care for animals and storage of personal belongings during period of temporary motel/hotel stay, if applicable. Households may not be prohibited from entry due to the presence of a traditional companion animal.
- Project must adhere to HUD and TPCH program requirements regarding Coordinated Entry participation, including a prohibition on serving households not referred through the Coordinated Entry System.
- Project must enter program participant information into the TPCH Homeless Management Information System and other databases specified by the City of Tucson within two days of enrollment/exit.
- Project must participate in regular coordination meetings with the City of Tucson and/or community-based teams regarding the implementation and utilization of the project.
- Project must complete reporting as required by the City of Tucson for project monitoring and HUD reports.
- Project must follow policies to be established by the City of Tucson as they relate to termination of assistance; due process; participant selection and prioritization, eligibility; maximum amounts and/or periods of assistance; eligible costs; prevention of duplication of benefits and use of waivers and/or alternative requirements, and other topics required by HUD or desired by the City of Tucson.
- Project must provide and obtain City approval of the program policies including admissions and termination of assistance policies, participant rules and agreements, and other policies that govern the implementation of the project. The City of Tucson retains the right to reject policies proposed by the project and to require the project to amend policies to meet City of Tucson expectations.
- Project must ensure that all project staff complete Fair Housing, Domestic Violence, and McKinney-Vento Homeless Education Benefits training within the first 30 days of the performance period and within 30 days of hire, thereafter, throughout the performance period. The Domestic Violence 101 for Housing and Homeless Services Providers, Fair Housing, and McKinney-Vento Homeless Education (School Access and Stability Under the McKinney-Vento Act) modules provided at no charge in the TPCH Online Training

Center satisfy this requirement. Project may alternatively provide evidence of completion of similar training through outside sources in which project staff participated not more than 180 days prior to the performance period start date. All staff shall complete refresher training on these topics not less than annually.

- Project must designate an individual staff member to serve as a resource broker and liaison between participating households with school-aged children or unaccompanied youth and McKinney-Vento Homeless Student liaisons to ensure that children and youth receive educational benefits and supports to which they are entitled.
- Project must ensure that individuals completing Housing Quality Standards (HQS) inspections, in lieu of housing habitability standards, have completed formal training in HQS inspection administration which may be evidenced by a certification of completion of the TPCH HQS Training Series for Non-Certified Inspectors or proof the staff member(s) completing HQS inspections hold current HQS inspector certification.
- If the project intends to complete Housing Habitability inspections rather than HQS inspections, the organization must include in its project description the specific training requirements and activities in which all habitability inspectors participate to ensure appropriate understanding and completion of habitability inspections.
- Project must maintain satisfactory policies and procedures and recordkeeping standards associated with the use of any waivers or alternative requirements.
- Project must establish the project as an independent account within the organization's chart of accounts and accounting system and ensure that account ledgers including all project expenses, and no expenses outside of the project, can be invoiced using system-driven financial statements.
- Project must meet City of Tucson insurance requirements as stated in the general conditions of the subaward agreement.
- Project must have capacity to deliver project services at 100% capacity on or before October 1, 2022 and achieve full project enrollment on or before January 1, 2023.
- Project must ensure all services are conducted in accordance with City of Tucson subaward general conditions, the ESG Interim Rule and relevant ESG-CV Notices issued by HUD, and the Tucson Pima Collaboration to End Homelessness Written Standards, HMIS Policies and Procedures, and Coordinated Entry Policies and Procedures.
- Organization administering the project must become a member of the Tucson Pima Collaboration to End Homelessness if not already and be represented at all TPCH General Council meetings during the performance period.
- Offer must ensure that households would not receive a duplication of benefits by participating in the project. Participants may not be currently enrolled in HUD-subsidized housing at the time of entry to the project or during the period the household receives assistance through the project.
- Project must agree to participate in subaward monitoring by the City of Tucson, its designees, and the U.S. Department of Housing and Urban Development.

## ELIGIBLE ACTIVITIES

ESG-CV eligible activities under the Homelessness Prevention component include:

- Eligibility Screening and Enrollment: All referred households must be screened for project eligibility prior to enrollment. Ineligible households shall be returned to the HMIS Lead as ineligible and referred to mainstream resources. Eligible households shall be enrolled in the project in the HMIS within two days of entry. Enrollment shall include documentation of participant eligibility, HMIS project entry, Coordinated Entry referral record, and housing stabilization plan.
- Rental Assistance: On-going rental assistance may be provided up to a maximum of six months (including any stays in temporary hotel/motel lodgings) and up to six additional months of rental arrears paid at the time of entry. The amount of monthly rental assistance paid may not exceed Fair Market Rent, or the rent reasonableness determination for the unit if the FMR waiver is used by the organization, less the portion of rent paid by the participant determined in accordance with tenant contribution standards outlined in the TPCW Written Standards.
- Financial Assistance: Project may provide financial assistance including rental application fees, security deposits, last month's rent, utility payments, moving costs, and in the event of emergency transfer needs as a result of domestic violence, lease break fees, subject to limitations described under the Eligible Costs heading below.
- Housing Search and Placement: Project must provide intensive housing search and placement assistance to help participants identify and secure leases in community-based housing. At a minimum, project must assist relocating participants to develop a reasonable rental budget, research and tour available units, submit leasing applications, and negotiate with landlords. Additionally, the project must complete housing habitability standards or Housing Quality Standards inspections, rent reasonableness verification, and lead-based paint hazard inspection for all units before providing rental assistance for the unit.
- Housing Stability Case Management: Project must provide housing stability case management services to assist households in maintaining permanent housing stability beyond project participation. Participating households must participate in housing stability case management sessions at least monthly. At a minimum, housing stability case management must include needs assessment, service planning, case coordination, and referral services to promote rapid housing stabilization.
- Additional Housing Relocation and Stabilization Services: Project may additionally provide credit repair, legal services, and tenant-landlord mediation services to the extent necessary to assist the household to regain housing stability subject to the limitations described under the Eligible Costs heading below.
- Essential Services: Project may additionally provide essential services including child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation assistance, and services for special populations subject to the limitations described under the Eligible Costs heading below.
- Additional Waiver Eligible Services: Project may additionally provide landlord incentives, vaccine incentives, temporary hotel/motel stay not to exceed the lesser of 60 days or the period of time remaining for which housing stability case management can be provided prior to the household entering permanent housing, participant cell phone and internet costs, personal protective equipment, and renter's insurance subject to the limitations described under the Eligible Costs heading below and upon approval of proposed policies and procedures for the administration and recordkeeping related to the use of the applicable waiver or alternative requirement by the City of Tucson.

## ELIGIBLE COSTS

- **Rental Assistance:** Rent assistance may include short-term and medium-term rental assistance up to a maximum of six months of rental assistance. Rental assistance may include any necessary combination of the following and is not subject to a dollar maximum per household:
  - **Rental Arrears:** Paid as a one-time payment for up to six months of rent in arrears, including any late fees on those arrears. Rental arrears payments do not count toward the six month cap on rental assistance payments described above.
  - **Rental Payment:** Short-term or medium-term rental assistance paid up to 100% of the household rental requirement subject to the limitations and participant contributions requirements defined in the [Tucson Pima Collaboration to End Homelessness Written Standards](#).

The prohibition on program participants receiving more than 24 months of ESG rental assistance assistance within any three-year period is waived for the purposes of ESG-CV homelessness prevention project administration.

Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Act (URA) during the period of time covered by the URA payments.

- **Housing Relocation and Stabilization - Financial Assistance:** Short-term financial assistance may be provided during the period of program participation to pay housing owners, utility companies, and other third parties for the following costs:
  - **Rental Application Fees:** ESG-CV funds may pay for the rental housing application fee that is charged by the owner to all applicants.
  - **Security Deposits:** ESG-CV funds may pay for a security deposit that is equal to more than 1.5 times the monthly rent. Although ESG regulations permit two months' rent as a maximum security deposit, Arizona Revised Statutes cap allowable security deposits at 1.5 times the monthly rent.
  - **Last Month's Rent:** If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG-CV funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent. The prohibition on program participants receiving more than 24 months of ESG rental assistance within any three-year period is waived for the purposes of ESG-CV project administration.
  - **Utility Deposits:** ESG-CV funds may pay for a standard utility deposit required by the utility company for all customers. Utility deposit assistance is limited to gas, electric, water, and sewage.
  - **Utility Payments:** ESG-CV funds may pay for up to six months of utility payments per program participant, per service, including up to six additional months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in the participant's or household member's name with a utility company or proof of responsibility to make

utility payments. Eligible utility services are gas, electric, water, and sewage. The prohibition on program participants receiving more than 24 months of ESG utility assistance within any three-year period is waived for the purposes of ESG-CV project administration.

- **Moving Costs**: ESG-CV funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to three months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
- **Lease Break for Emergency Transfer**: If a program participant receiving short-term or medium-term rental assistance meets the conditions for an emergency transfer under [24 CFR 5.2005](#) and the [Tucson Pima Collaboration to End Homelessness Written Standards](#), ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer.
- **Housing Relocation and Stabilization – Services**: Subject to the general restrictions under [24 CFR 576.103](#) and [HUD CPD Notice #CPD-22-06](#), ESG funds may be used to pay the cost of following services:
  - **Housing Search and Placement**: Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, including the following:
    - Assessment of housing barriers, needs, and preferences,
    - Development of an action plan for locating housing,
    - Housing search,
    - Outreach to and negotiation with property owners
    - Assistance with submitting rental applications and understanding leases,
    - Assessment of housing for compliance with ESG-CV requirements for habitability, lead-based paint, and rent reasonableness
    - Assistance with obtaining utilities and making moving arrangements, and
    - Tenant counseling.
  - **Housing Stability Case Management**: ESG-CV funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 60 days during the period the program participant is seeking permanent housing. Component services and activities consist of:
    - Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#), to evaluate individuals and families applying for or receiving homelessness prevention assistance;
    - Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention assistance;
    - Housing counseling services as defined in [24 CFR 5.100](#). Housing counseling services must be carried out in accordance with [24 CFR 5.111](#). When recipients or subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in [24 CFR 5.100](#), and therefore are not required to be carried out in accordance with the certification requirements of [24 CFR 5.111](#);
    - Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

- Monitoring and evaluating program participant progress;
  - Providing information and referrals to other providers;
  - Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
  - Conducting re-evaluations required under [24 CFR 576.401\(b\)](#).
- **Mediation:** ESG-CV funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
  - **Legal Services:** ESG-CV funds may pay for legal services as set forth in [24 CFR 576.102\(a\)\(1\)\(vi\)](#), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
  - **Credit Repair:** ESG-CV funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
  - **Waiver Eligible - Essential Services:** ESG-CV funds may be used to pay for Essential Services not generally allowable under the Homelessness Prevention component of the ESG Program. Organizations are required to adopt this waiver to ensure that household needs can be met during project participation; however, applicant is not required to provide all essential services. At a minimum, applicants must provide transportation assistance when needed to assist participating households to achieve housing stability. Eligible costs include the following to the extent that they are necessary to achieve household stability:
    - **Child Care:** Costs of child care for program participants including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
    - **Education Services:** When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
    - **Employment Assistance and Job Training:** The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking

skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

- Outpatient Health Services: Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. ESG-CV funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.
- Legal Services: Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. ESG-CV funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants. Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services. Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.
- Life Skills Training: The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
- Mental Health Services: Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG-CV funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- Substance Abuse Treatment Services: Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. ESG-CV funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable

or inaccessible within the community. Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

- **Transportation:** Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:
  - The cost of a program participant's travel on public transportation;
  - If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
  - The cost of leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
  - The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
  
- **Services for Special Populations:** ESG-CV funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are described as eligible above. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.
  
- **Waiver Eligible – Landlord Incentives:** Applicants which elect to make use of the waiver/alternative requirement permitting the payment of landlord incentives may pay one-time landlord incentives not to exceed the amount of three times the monthly rent for the applicable unit. The landlord incentive may include any combination of the following up to a maximum of three times the monthly rent:
  - One time signing bonus not to exceed two times the monthly rent;
  - Cost to repair damages incurred by program participant not covered by security deposit or incurred while program participant is staying in the unit; and
  - Costs of extra cleaning or maintenance of a program participant's unit or appliances.
  
- **Waiver Eligible – Vaccine Incentives:** Applicants which elect to make use of the waiver/alternative requirement permitting the payment of COVID-19 vaccine incentives may use ESG-CV funds to provide one-time \$50 cash or gift card incentives to program participants experiencing Category 2, 3, or 4 of the HUD Homeless definition at entry. This waiver does not include persons eligible for ESG-CV Homelessness Prevention under the At Risk of Homelessness definition. ESG-CV funded incentives are only eligible to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community. Vaccine incentives may not be paid for doses previously administered and may only be paid when the City of Tucson ESG-CV Vaccine Incentive packet is completed and provided to the City of Tucson with the reimbursement request. Reimbursement requests not accompanied by complete and qualifying ESG-CV Vaccine Incentive packets will not be reimbursed.
  
- **Waiver Eligible – Temporary Hotel/Motel Stay:** Applicants which elect to make use of the waiver/alternative requirement permitting the payment of temporary hotel stays for enrolled participants when housing loss occurs during program participation may use ESG-CV funds to pay the cost of temporary lodging in a hotel or motel provided that such such lodging is accompanied by housing stabilization and relocation case management and does not exceed the 60-day period during which case



management assistance can be provided during housing search. Eligible costs include nightly hotel/motel room rental, cleaning of hotel/motel rooms used by participants, and repairs for damage caused by program participants above normal wear and tear.

- **Waiver Eligible – Participant Cell Phone and Internet Costs:** Applicants which elect to make use of the waiver/alternative requirement permitting the payment of participant and cell phone costs may use ESG-CV funds to provide temporary cell phones for individuals and families receiving homelessness prevention assistance, subject to the following requirements:
  - All equipment be owned by the subrecipient, and the wireless plan must be the subrecipient's. Phone and phone service may be loaned to participant and wireless cost paid as need to enable program participant to take part in activities necessary to obtain/maintain housing (e.g., job interviews; receive health and mental health services; continue education)
  - Cell phone and internet may only be provided while the participant continues to need it to participate in activities necessary to obtain and maintain housing that remain virtual even after social distancing measures relaxed (e.g. continued virtual employment and education)
  - Cell phones and other associated equipment must be returned to the subrecipient when no longer necessary for those purposes or at project exit, whichever is earlier.
- **Waiver Eligible – Personal Protective Equipment:** Applicants which elect to make use of the waiver/alternative requirement permitting the purchase of Personal Protective Equipment may use ESG-CV funds to purchase personal protective equipment such as masks, disposable gloves, and hand sanitizer for program participants receiving homelessness prevention assistance provided that no there are no alternative readily available no-cost sources of PPE available through the Pima County Health Department or other resources. PPE shall be classified as a subcategory of Essential Services costs.
- **Waiver Eligible – Renter's Insurance:** Applicants which elect to make use of the waiver/alternative requirement permitting the payment of renter's insurance may use ESG-CV funds to pay for renter's insurance for homelessness prevention program participants provided that payment is necessary to obtain/maintain housing (e.g. it is required by the landlord of all tenants in the property) and payment is made directly to insurance company on behalf of the program participant.
- **Administrative Costs:** The City of Tucson will not fund direct administrative costs through this solicitation.
- **Indirect Costs:** Indirect costs shall be reimbursed in accordance with the requirements of 2 CFR 200. Organizations with an approved federally negotiated indirect cost rate agreement shall provide a copy of the organization's current indirect cost rate agreement and shall be reimbursed for indirect costs according to the project expense and direct cost base defined in that agreement. Organizations which do not have a current approved federally negotiated indirect cost rate agreement may elect to claim the de minimis rate which allows 10% indirect cost recovery on all eligible direct project costs included in the modified total direct cost base defined in [2 CFR 200.68](#). Organizations may elect to decline indirect cost recovery or claim a lower rate than authorized by the de minimis or negotiated indirect cost rate agreement. Such elections shall be made using Exhibit E – Indirect Cost Recovery Affidavit which is attached this solicitation and incorporated herein.
- **Ineligible Costs:** All costs not specifically defined as eligible or associated with eligible activities described above are ineligible.

## **ANTICIPATED OUTCOMES**

Projects funded under this solicitation are expected to achieve the following performance measures. Projects will be monitored by the City of Tucson and funding may be reduced or eliminated in the event of on-going underperformance.

- 90% or more of households served will have known exit destinations reported in the HMIS
- 80% or more of households served will exit to permanent housing destinations as reported in the HMIS
- 90% or higher HMIS Data Quality