



# **Family Homeless Prevention and Assistance Program Guide**

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## Chapter 1 – Introduction and Commitment to Equity

The Family Homeless Prevention and Assistance Program (FHPAP) was established in 1993 by the Minnesota Legislature to assist families with children, single adults and youth who are homeless or at imminent risk of homelessness. Minnesota Housing is the agency administrator of FHPAP funds, and funding is contingent upon approval by the Minnesota Legislature. Funds are awarded through a competitive Request for Proposals (RFP) process and are available statewide.

Minnesota Housing created this guide, which outlines FHPAP requirements and steps on how to implement FHPAP funded projects. Minnesota Housing program staff are available to provide information needed to operate the program. For questions and/or to offer feedback, contact us at [mhfa.grants@state.mn.us](mailto:mhfa.grants@state.mn.us).

### Commitment to Equity

One of Minnesota Housing's values is to be inclusive, equitable and just in its actions, as stated on its [website](#). This not only includes supporting a new state [Plan to Prevent and End Homelessness](#) that focuses on racial, housing and health justice, but it also extends to Minnesota Housing's funding commitments, including FHPAP.

To further address the racial disparities that exist among Minnesotans experiencing homelessness, Minnesota Housing prioritizes working with grant administrators who will be successful at improving housing stability for communities disproportionately impacted by homelessness, including those who can provide culturally specific services.

Minnesota Housing staff addresses equity when awarding funds and strives to maintain transparent and clear communication. Contact Minnesota Housing at the email listed above with suggestions, comments, program related questions, and any preferences regarding communication.

## Chapter 2 – Purpose

### 2.01 Preventing and Ending Homelessness

Effectively ending homelessness means preventing homelessness whenever possible, and if homelessness does occur, that it is rare, brief, and nonrecurring (one-time). The outcomes of FHPAP, which align with the State Plan to Prevent and End Homelessness, are to:

- Reduce the number of people who become homeless for the first time (*Prevent*)
- Reduce the number of people who experience homelessness (*Rare*)
- Reduce the length of time people experience homelessness (*Brief*)
- Reduce the number of people who return to homelessness (*One-time*)
- Increase equitable outcomes for households who are disparately impacted by homelessness (*Equity*)

FHPAP resources are intended to complement the existing network of services in the community's [Continuum of Care \(CoC\) region](#) or within Tribal Nations and provides funding for four activities designed to address or prevent homelessness. The four activities are: 1) Coordinated Entry; 2) Street Outreach; 3) Prevention; and 4) Rapid Rehousing. Refer to Chapter 4 for a more detailed description of these activities.

Funds can only be used for eligible activities which are defined in Chapter 6.01 and include direct financial assistance or services. Eligible households are at or below 200% of federal poverty guidelines and who are experiencing homelessness or are at imminent risk of homelessness. Funds may also be used for eligible administrative expenses, not to exceed 10% of the total grant amount. Refer to Chapter 4 which outlines the allowable eligible activities.

### 2.02 Statute

[Minnesota Statutes](#) Section 462A.204 provides legislative requirements as they pertain to selection criteria, project design, authorized uses of grant funds, and the requirements for an advisory committee. Subdivision 8 of the statute also outlines requirements for school stability projects, which are relevant to the [Homework Starts with Home \(HSWH\) program](#). The HSWH program serves families with children eligible for a pre-Kindergarten through grade 12 academic program and youth (with or without children of their own) who are eligible for an academic program through grade 12 and who are without their parent or guardian. All grantees should be familiar with the statute that authorizes FHPAP.

For more information on HSWH refer to Chapter 7, School Stability.

## Chapter 3 – Eligibility Criteria

### 3.01 Eligible Grantees

Eligible grantees are as follows:

- Tribal Nations
- Twin Cities metropolitan counties, which include Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties
- Non-metropolitan areas, which include a county, a group of contiguous counties jointly acting together, or a community-based nonprofit organization with a sponsoring resolution from each of the county boards located within the operating jurisdiction

The state of Minnesota and the federal government recognize the existence of the following Tribal Nations: Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, Leech Lake Band of Ojibwe, Lower Sioux Indian Community, Mille Lacs Band of Ojibwe, Prairie Island Indian Community, Red Lake Nation, Shakopee Mdewakanton Sioux Community, Upper Sioux Community, and the White Earth Nation. Collaborative applications, including those from CoC regions or Tribal Nations, are encouraged.

### 3.02 Eligible Households

Eligible households of FHPAP assistance must meet the following criteria:

- Eligible household income must be at or below 200 % of federal poverty guidelines
- Eligible households must be Minnesota residents, or a household otherwise approved in writing by Minnesota Housing, approval of which is at Minnesota Housing’s sole discretion
- Eligible households must be homeless or at imminent risk of homelessness and in need of services and/or financial assistance due to a housing crisis

Grantees may add additional criteria in some circumstances, such as:

- 1) Grantees may choose to further restrict household income below 200% of federal poverty guidelines in order to target households with the greatest need
- 2) Grantees may choose to further target their Rapid Rehousing resources toward households prioritized by their CoC, such as chronically homeless or literally homeless
- 3) Grantees or subgrantees that specialize in serving a specific population, such as youth or families, may target those households; however, grantees are obligated to describe in their application how they intend to serve all populations (families, youth, singles). This can be accomplished by describing complementary funding sources or programs that are being used to meet the needs of some of these populations.
- 4) A grantee or subgrantee may dually assess a household for FHPAP eligibility at the same time as assessing the household for Emergency Assistance/Emergency General Assistance



(EA/EGA) if the assessment process does not provide an additional burden to the household. For example, if a household is applying for assistance on a common application, such as FHPAP, EA, EGA, etc., and the county and/or grantee makes the determination regarding the funding source to be used, the process for the particular funding source should not be an additional burden on the household to complete.

Outside of the four exceptions noted above, grantees and subgrantees should not add additional eligibility criteria without the prior written approval of Minnesota Housing, as additional criteria could act as a barrier to households who are trying to access FHPAP.

### **3.03 Commitment to Equity**

An underlying strategy in Minnesota’s Plan to Prevent and End Homelessness is to address racial disparities that exist within Minnesota’s homeless population. In partnership with culturally specific communities, including Tribal Nations, Minnesota Housing will prioritize funding for efforts most successful at improving housing stability for communities disproportionately impacted by homelessness.

Applicants are strongly encouraged to plan efforts to serve those populations most disparately impacted and to help ensure services are culturally specific to better reflect the needs of those being served.

## Chapter 4 – Eligible Activities

Applicants can apply for funding for up to four activities: Coordinated Entry, Street Outreach, Prevention, and Rapid Rehousing. The tables below include a description of each category as well as types of services and assistance that can be provided.

### 4.01 Coordinated Entry

Coordinated Entry is a centralized process to coordinate household intake assessment and provision of referrals and is an eligible category to carry out necessary FHPAP homeless assessments. A centralized or coordinated assessment system covers the geographic area such as a CoC region or a Tribe/group of Tribes, and, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

Activity	Coordinated Entry	
Description of Model	Provide assessments and information to connect FHPAP-eligible households to applicable resources.	
Household Eligibility	People who are experiencing homelessness or at imminent risk of homelessness.	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> <li>• Homeless Assessment</li> <li>• Diversion</li> <li>• Referrals</li> </ul>	<ul style="list-style-type: none"> <li>• Basic needs</li> <li>• One-time financial assistance to resolve the crisis (such as diversion assistance)</li> <li>• Transportation assistance such as gas cards or bus tokens*</li> </ul>

\*Must result in a household achieving permanent housing. For example, a gas card is needed to secure permanent housing by driving to live with family.

### 4.02 Street Outreach

Street outreach is an activity that is **intended to provide emergency services and engagement** intended to link households who are homeless or at imminent risk of homelessness with available shelter, housing, and/or critical health and supportive services. Street outreach and engagement activities actively reach out to those experiencing or who are at risk of homelessness and include households that would not otherwise be connected to the homeless response system.

Examples of FHPAP street outreach may include responding to requests from police or other referral sources to connect with a household living outside or in their car, visiting known

locations where homeless people may live, such as vacant structures or encampments, or connecting with households at youth drop-in sites, free meal sites, food shelves, etc.

Activity	Street Outreach	
Description of Model	Emergency services and engagement intended to link households who are homeless or at imminent risk of homelessness with available shelter, housing, and/or supportive services.	
Household Eligibility	People experiencing homelessness and are not connected to the homeless response system. This can include doubled up households.	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> <li>• Safety provisions</li> <li>• Assessment and referrals to other programs and services</li> <li>• On-site medical screening and assessment</li> <li>• Population specific information/services, such as:                             <ul style="list-style-type: none"> <li>○ Vets: MACV (Minnesota Assistance Council for Veterans)</li> <li>○ Domestic Violence/Sexual Violence/Trafficking</li> <li>○ Youth</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Basic needs (food, clothing, blankets)</li> <li>• Transportation assistance such as a gas card or bus tokens*</li> </ul>

\* For example, bus tokens are needed to go to shelter or for transportation to move in with family.

### 4.03 Prevention

Prevention is intended to **reduce the number of people who become homeless** and includes a set of strategies to assist people in maintaining permanent housing or divert them from entering the homeless system. Service strategies are focused on addressing the immediate housing crisis and can be integrated with other mainstream resources to address more long-term needs. FHPAP is designed to prevent homelessness by assisting people at imminent risk of homelessness (or doubled up), and assistance is targeted toward those who will most likely experience homelessness within 30 days if they do not receive assistance. Permanent housing includes a number of living situations such as home ownership, household renting with their own lease, renting in a roommate situation, living in a host home or other permanent tenure. Grantees should choose activities that target FHPAP resources to best meet community needs and assist those households most likely to experience homelessness if assistance were not provided.

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Activity	Prevention (this can include doubled up households)	
Description of Model	Temporary financial assistance and/or supportive services to assist people in maintaining existing permanent housing, relocation to more appropriate permanent housing, and/or diverting them from entering the homeless system. Households must meet FHPAP eligibility criteria.	
Household Eligibility	Households based on the Minnesota Homelessness Prevention Assessment (M-PAT) score, or other assessment tool approved in writing by Minnesota Housing program staff. The score of the M-PAT or other assessment tool should anticipate those households who will most likely experience homelessness within 30 days if they do not receive assistance.	
Program Strategies	Service Set	Assistance Set
	<ul style="list-style-type: none"> <li>• M-PAT or other assessment tool approved by Minnesota Housing program staff</li> <li>• Referral to resources, including but not limited to, cash and non-cash benefits, legal aid, childcare, mental health/chemical health, employment, and financial assistance</li> <li>• Budgeting assistance</li> <li>• Tenant-landlord mediation</li> </ul>	<ul style="list-style-type: none"> <li>• Rental assistance</li> <li>• Mortgage assistance</li> <li>• Utility assistance (including past due)</li> <li>• Transportation assistance, such as a gas card, bus tokens or vehicle repairs*</li> <li>• Rental application fees</li> <li>• Vital documents such as a social security card or ID*</li> <li>• Furniture/household supplies</li> </ul>

\*Must result in a household achieving permanent housing. For example, bus tokens are needed to view a potential housing opportunity to rehouse without a day of homelessness, or an ID is needed to apply for housing or employment.

Grantees and subgrantees are required to assess households at risk of homelessness using the M-PAT or another assessment tool approved by Minnesota Housing. Households that are homeless or doubled up and are also not eligible to be assessed or prioritized for homeless assistance through coordinated entry must be assessed utilizing the M-PAT or another assessment, as approved in writing by Minnesota Housing program staff.

The M-PAT is designed to assist FHPAP program staff with two functions: 1) verify eligibility for homelessness prevention assistance, and 2) identify the most vulnerable households most likely to experience homelessness if they do not receive assistance. In assisting with these two activities (verifying eligibility and targeting the most vulnerable households), the tool will support Minnesota’s goal of reducing the number of people who become homeless. Note that this tool is designed to be administered by staff and should not be completed by the household. This tool is translated in Hmong, Somali and Spanish and can be found on Minnesota Housing’s [FHPAP webpage](#).

Households assessed will score in one of four categories:

- Light touch
- One-time direct financial assistance
- Short-term service and direct financial assistance (up to six months)
- Medium term service and direct financial assistance (seven to 24 months)

#### **4.04 Rapid Rehousing**

Rapid Rehousing’s fundamental goal is to **reduce the amount of time people spend homeless** and is designed for households to quickly exit homelessness and return to permanent housing. Permanent housing includes a number of living situations such as home ownership, household renting with their own lease, renting in a roommate situation, living in a host home or other permanent tenure. Rapid rehousing assistance is typically tailored to the unique needs of the household.

In general, Rapid Rehousing can provide short- to medium-term (up to 24 months) of rental assistance and services and should be offered without preconditions (such as employment, income, absence of a criminal record or poor credit, sobriety, etc.). FHPAP Rapid Rehousing is more aligned with serving households short-term (one to six months of assistance); however, it is possible assistance can be provided for a longer period (up to 24 months) if assessment or program staff determines the household needs continued assistance. An example may be if grantees choose to utilize Rapid Rehousing as a bridge program for persons who score for more intensive activities or services but for whom those more intensive programs are not available at the time of referral. It is also possible that a community does not have other Rapid Rehousing programs, which makes FHPAP attractive for both short- and medium-terms.

While Rapid Rehousing can be highly successful for many households, it is not designed to address all household needs or necessarily end their situation of poverty, especially households who need supportive housing or longer-term case management. Households, however, should not be denied Rapid Rehousing assistance strictly based upon their current household income.

The three components of Rapid Rehousing include:

- Case management and services
  - Provide appropriate and time-limited services and supports, including services such as assessing barriers to housing stability, housing search assistance, advocacy on behalf of the household, making referrals and connections to community resources, follow-up with households and monitoring housing stability (refer to Chapter 6: Eligible Expenses and Supportive Services Activities, Section 6.02: Supportive Services Activities: Case Management).
- Housing navigation assistance

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- Provide housing search assistance, engage and recruit landlords, landlord-tenant mediation, assist household with completing applications, etc. (refer to Chapter 6 Eligible Expenses and Supportive Services Activities, Section 602: Supportive Service Activities: Housing Navigation)
- Rent payment and move-in assistance
  - Provide financial assistance such as rent, security deposit or application fees to move into permanent housing as rapidly as possible (refer to Chapter 6: Eligible Expenses and Supportive Services Activities Section 6.01: Eligible Expenses: Direct Financial Assistance).

Activity	Rapid Rehousing	
Description of Model	Services and/or financial assistance to help quickly rehouse households experiencing homelessness; households must meet FHPAP eligibility criteria	
Household Eligibility	<ul style="list-style-type: none"> <li>● Currently experiencing homelessness</li> <li>● Households at or below 200% of federal poverty guidelines</li> <li>● Minnesota resident or otherwise approved by Minnesota Housing</li> <li>● No other means to resolve crisis, likely to remain homeless unless assistance is provided</li> </ul>	
Program Strategies (minimum expected)	Service Set	Assistance Set
	<ul style="list-style-type: none"> <li>● Housing navigation assistance                             <ul style="list-style-type: none"> <li>○ Landlord engagement and recruitment</li> </ul> </li> <li>● Assisting households with housing search</li> <li>● Case management including:                             <ul style="list-style-type: none"> <li>○ Financial management</li> <li>○ Life skills</li> <li>○ Employment training and support or connections to such services</li> <li>○ Mental Health/Chemical Dependency services and referral</li> <li>○ Connections to mainstream resources</li> <li>○ Tenant education</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Rental Assistance (including)                             <ul style="list-style-type: none"> <li>○ Monthly rent</li> <li>○ First/last month’s rent</li> </ul> </li> <li>● Deposit (up to three times the amount of monthly rent)</li> <li>● Housing application fees</li> <li>● Utility assistance, including past due</li> <li>● Transportation assistance such as a gas card, bus tokens, vehicle repair*</li> <li>● Eviction filing fees*</li> <li>● Vital documents such as a social security card or ID*</li> <li>● Furniture/household supplies</li> </ul>
	Service Set	Assistance Set

<p>Program Strategies (additional)</p>	<ul style="list-style-type: none"> <li>• Landlord mediation, education, and engagement</li> <li>• Family reunification</li> <li>• Legal assistance</li> <li>• Established services/partnerships for immigrant populations</li> </ul>	<p>Financial assistance may include:</p> <ul style="list-style-type: none"> <li>• Landlord risk mitigation funds or fees that provide landlords with a time limited financial reimbursement for unpaid rent or damages beyond the rental deposit, with a cap on the amount of reimbursement available. (Landlord risk mitigation funds committed on behalf of a household cannot be carried over into the next biennium, i.e., if funds not accessed by the landlord within the grant term must be returned or reallocated.) Consult with Minnesota Housing for more information.</li> </ul>
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\*Must result in a household achieving permanent housing. For example, eviction filing fees are paid, which guarantee the household will maintain their current housing, car assistance repair to assist a household to travel to work so they are able to pay their rent, or bus tokens to view a potential housing opportunity

Some grantees offering Prevention and/or short-term Rapid Rehousing assistance (one to six months of financial assistance) may choose to require a tenant portion of rent based upon their income. Grantees are encouraged to consult with their CoC, the Minnesota Tribal Collaborative, or other Tribal Nations to make determinations about whether to implement required tenant rent portions based upon household income.

## Chapter 5 – Ineligible Activities and Expenses

Activities that are not eligible under this grant include:

- To acquire, rehabilitate, or construct emergency shelters, transitional or permanent housing
- Payment for more than 24 months of rental assistance or supportive services
- Payment for operating costs of emergency shelter, including hotel/motel expenses; note that payment for staff working at an emergency shelter who provide housing search assistance or housing navigation services is allowable
- Payment for operating [permanent supportive housing](#) and supportive services expenses related to that housing



## Chapter 6 – Eligible Expenses and Supportive Services Activities

There are three eligible FHPAP expense categories: Supportive Services, Direct Financial Assistance, and Administration

### 6.01 Eligible Expenses

#### Supportive Services

Supportive services include staffing and related expenses, as outlined below, for providing case management, housing navigation, HMIS support, and management staff.

Eligible supportive services expenses include:

- Salary, wages, and fringe benefits of staff working directly with households; this includes management staff who spend part of their time working directly with households (the full-time equivalent [FTE] should be proportional). Time spent conducting supervision may be included but must not exceed the proportion funded by FHPAP.
- Mileage
- Supplies, copies, postage directly related to the program
- Training
- Office space/utilities. If these expenses are billed to FHPAP, they must be pro-rated and cannot exceed the staffing FTE. An exception to this requirement is if staff are employed at an agency part-time and 100% of their time is dedicated to FHPAP (they do not work in another program). In such circumstances, FHPAP may be used to pay for the full cost as long as it is identified in the approved budget.
- Phone, computer, internet. If these expenses are billed to FHPAP, they must be prorated and cannot exceed the staffing FTE. An exception to this requirement is if staff are employed at an agency part-time and 100% of their time is dedicated to FHPAP (they do not work in another program). In such circumstances, FHPAP may be used to pay for the full cost as long as it is identified in the approved budget.
- HMIS license
- Other staffing expenses directly related to the program, which must be approved in writing by Minnesota Housing
- Supportive services costs cannot exceed 50% of the total budget unless this was requested in the application, approved by Minnesota Housing and is reflected in the budget exhibit of the Grant Contract Agreement. This is the only timeframe in which requests to exceed the 50% cap will be considered (refer to Chapter 10: Preparing the Application, Section 10.01: Planning).

#### Direct Financial Assistance

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Direct financial assistance is funding used to stabilize a household and prevent a homeless episode, or to rehouse a household into permanent, stable housing. Direct financial assistance includes:

- Rent payment assistance, including the following:
  - Unpaid rent owed to a previous landlord is eligible if payment will result in housing attainment. Grantees and subgrantees must receive a written guarantee from the landlord that will accept the household prior to submission of payment to the previous landlord.
  - Households receiving ongoing rental assistance, such as Project-based Section 8, may receive rent payment assistance; however, only the household rent portion is eligible. If the household need is due to a decrease in income and they did not contact the landlord/property manager to have their rent portion adjusted, program staff should assist them in doing so.
- Late fees are eligible if the tenant and landlord agreed upon this in writing; however, it is important to note that late fees cannot exceed the amount outlined in Minnesota Statutes Section [504B.177](#)
- Mortgage payment assistance, including eligible late fees, which are generally 4 – 5 % and vary by lender. The authorized percentage is provided on the homeowner’s Note
- Rental deposit assistance including up to three times the amount of monthly household rent portion, if doing so will result in a household with rental barriers obtaining housing
- Rental application fees
- Utility bill payment assistance, including deposits for utilities such as gas and electric, and prepayments for propane and wood
- Transportation expense assistance, e.g., bus tokens, gas card, cash assistance for car repairs, that result in a household achieving permanent housing
- Vital documents such as payment for an identification to obtain employment or a social security card to apply for housing
- Moving assistance (costs for household to move to new unit without a day of homelessness or to move a household experiencing homelessness into a new unit)
- Furniture/household supplies (costs for households moving into a new unit who do not have furniture or household supplies)

Direct financial assistance costs are an eligible expense only if the assistance is needed due to a housing crisis and correlates with a housing stability outcome. This should be well documented in the household file.

### **Administration**

Grantees must ensure that no more than 10% of the FHPAP grant is used for administrative expenses. Eligible administrative expenses include:

- Salaries/wages/fringe benefits of staff responsible for program oversight (HMIS data staff can be included in either administration or supportive services, depending upon who is responsible for data entry)
- Travel
- Supplies, copies, postage
- Training
- Phone, computer, internet
- Office space/utilities
- Household stipends, including transportation assistance for persons with lived experience who are involved in planning, design and evaluation of FHPAP activities
  - Information technology support
  - Human Resources
  - Audit, insurance, accounting
  - Cost to use digital or electronic signatures

Agencies that utilize cost allocation plans for administrative expenses will be required to provide a description in the work plan that is submitted as part of due diligence.

## **6.02 Supportive Services Activities**

### **Case Management**

Case management must include, for each household, the following activities:

- **Assessment:** Work collaboratively with the household to identify strengths, resources, barriers and needs in the context of their local environment
- **Plan Development:** Develop an individualized service plan, with specific outcomes, based on the assessment
- **Connection:** Obtain for the household the necessary services, treatment and supports
- **Coordination:** Bring together all of the service providers in order to integrate services and ensure consistency of service plans
- **Monitor:** Evaluate with the household their progress and needs, and adjust the plan as needed
- **Personal advocacy:** Intercede on behalf of the household to help ensure access to timely and appropriate services

The activities listed above are the activities that, taken together, make up case management. These case management activities will vary in a number of ways. The following variables are related to how case management is provided, as opposed to what case management actually is:

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- Intensity (frequency of contact; household-staff ratios)
  - The intensity and frequency of case management may vary depending upon the type of service households are receiving, i.e., one-time, short- or medium-term assistance. Households often receive more frequent and intensive services when they first enter FHPAP, and this may decrease as the household makes progress toward housing stability. The minimum expectation of household contact is once per month.
- Duration (from brief to time-limited to open-ended)
- Focus (from narrow to targeted to comprehensive)
- Availability of staff (from scheduled office hours to 24-hour availability)
- Location of services
- Staffing patterns (from individual caseloads to interdisciplinary teams with shared caseloads, depending on the need of the household)

In addition to the above components of case management, there are other activities often offered that enhance the core case management activities. These six activities can be divided into two broad categories, household specific activities and system activities.

### Household Specific Activities:

- Outreach and engagement: To attempt to connect with households not currently accessing services
- Direct service: To provide services directly to the household (budget counseling, housing search assistance (housing navigation); refer below for further information on housing navigation.
- Crisis intervention: To assist households in crisis in order to stabilize, through direct interventions, and to mobilize needed support and services
- Follow-up: To maintain contact with the household prior to exiting them from services in order to track stability and provide additional services, if needed
- Final contact: Within 15 – 60 days after a household exits from services, attempt to contact the household to verify housing stability and provide additional services, if needed. Attempted contact can occur via text, phone, email, etc.

### System Activities:

- System advocacy: To intervene with organizations in larger systems in order to promote more effective, equitable and accountable services to a client group (to be distinguished from personal advocacy above)
- Resource development: To attempt to create additional services or resources to address the needs of households

**Housing Navigation**

Housing navigation services, whether through a case manager or another position dedicated to housing navigation, are eligible FHPAP expenses.

The purpose of a housing navigator is to minimize the number of days homeless by assisting the household in obtaining housing as quickly as possible. While services may be short- to medium-term, they are generally intensive in nature and usually involve multiple and frequent contact with the household, which can include in person, virtual, texts, email and/or phone. It also includes staff actively assisting the household in its housing search. Staff should seek input from the household regarding the level of housing search assistance they need and consider other factors, including household barriers such as mental health, rental history, including unlawful detainers, unpaid rent or damages, credit history, criminal background, lack of transportation, etc. In addition, low vacancy rates or increased landlord resistance to lease to households with barriers may require additional staff assistance to engage with housing search and potential landlords.

Housing navigation activities include:

- Recruiting landlords, including outreach to an organization’s network of existing landlords
- Utilizing search engines to locate housing opportunities
- Attaining ongoing communication with landlords to engage, maintain a positive relationship with, and mitigate any issues that may arise during tenancy
- Keeping an active list of subsidized housing, including project-based waiting list openings
- Assisting households in completing housing applications
- Assisting households in obtaining application fees
- Transporting households to housing appointments
- Assisting households in communicating to a potential landlord any housing barriers
- Providing tenant education on landlord and tenant rights and responsibilities
- Expediting the move-in timeline when feasible, between the date of acceptance and lease signing

For more information on housing navigation activities, refer to the United States Department of Housing and Urban Development (HUD) [Housing Search Assistance Toolkit](#).

## Chapter 7 – School Stability

[Minnesota Statutes Section 462A.204, subdivision 8](#), authorizes the use of FHPAP grant funds for a school stability project to secure stable housing for families with school-aged children (pre-kindergarten through grade 12) who have moved frequently, and also for unaccompanied youth. Minnesota Housing, in partnership with the Minnesota Department of Education, have utilized subdivision 8 to establish the Homework Starts with Home school stability project. For more information, refer to the [Homework Starts with Home webpage](#).

In addition, the [McKinney-Vento Homeless Education Assistance Improvements Act of 2001](#) ensures families have the opportunity to maintain education stability for their student, which is key to their educational trajectory and success. One of the priorities of the act is the provision of transportation services to allow students experiencing homelessness to remain in their school of origin, which is defined as the school that the student attended when they first experienced homelessness.

Because school stability is important for all homeless families with children, as well as unaccompanied youth, grantees and subgrantees should assess whether children of homeless households are receiving transportation to their school or origin, and if not, assist in connecting households with their school district homeless liaison.

Refer to the [Minnesota Department of Education](#) website for more information on McKinney-Vento, including a list and contact information for the state’s district homeless liaison staff.

## Chapter 8 – Budget Modifications

### Budget Modifications that Do Not Require Pre-approval

Grantees are not required to seek Minnesota Housing approval for the following budget modifications but are required to inform Minnesota Housing staff in writing of these budget modifications within two working days of advisory committee approval, or other approval as outlined in the advisory committee bylaws:

- Moving funds from Administration to Direct Financial Assistance or Supportive Services, provided Supportive Services do not exceed 50% of the total budget unless it is allowed in the Grant Contract Agreement (refer to Chapter 10: Preparing the Application, Section 10.01: Planning)
- Moving funds from Supportive Services to Direct Financial Assistance within the same activity, i.e., Coordinated Entry, Street Outreach, Prevention, and Rapid Rehousing, provided there will not be a reduction in projected households to be served and there is no impact to the program design outlined in the application
- Moving funds from a grantee's budget to a subgrantee's, or moving funds from one subgrantee's budget to another subgrantee's budget, provided that the funds are within the same budget category, for example Rapid Rehousing, and that moving funds will not result in a reduction in projected households to be served and there is no impact to the program design outlined in the application

All other budget modifications require approval from Minnesota Housing. When requesting a budget modification, grantees must submit the following information in writing to Minnesota Housing staff:

- The reason for the request;
- The amount of funds proposed to be shifted;
- The expense categories that funds will be moved to and from
- The subgrantees impacted; and,
- If there will be a change in the total projected households served or an impact to the program design outlined in the application

Budget modification request approvals are at the sole discretion of Minnesota Housing.

## Chapter 9 – Advisory Committee

### 9.01 Statute Requirement

As outlined in [Minnesota Statutes Section 462A.204, subdivision 6](#):

Each grantee shall establish an advisory committee consisting of a homeless advocate, a homeless person or formerly homeless person, a member of the state interagency council on homelessness, local representatives, if any, of public and private providers of emergency shelter, transitional housing, and permanent affordable housing, and other members of the public not representatives of those specifically described in this sentence.

### 9.02 Membership

Grantees must, at a minimum, include the following members:

- A person with lived experience, i.e., homeless or formerly homeless individual
- A homeless advocate
- A representative from the local Tribal Nation, if applicable
- A member of the Minnesota Interagency Council on Homelessness
- Local representatives, if any, of public and private providers of emergency shelters, transitional housing and permanent affordable housing
- Housing Trust Fund administrator

It is also recommended that advisory committee membership include:

- Local law enforcement
- Landlords
- School liaison staff
- Legal aid
- County/Tribal staff
- Employment organizations
- Coordinated entry staff

### 9.03 Roles and Responsibilities

Grantees may structure their advisory committee in a way that best meets their needs. What follows are common structures for advisory committees:

- Two or more grantees may join to establish a single advisory committee
- The advisory committee may be the CoC or a subgroup of the CoC membership



- The advisory committee may have several housing response committees that are workgroups that represent different geographies within the grantee’s service area

Grantees are expected to consult with their advisory committee on a regular basis regarding the design, implementation and ongoing evaluation and redesign of the project. Advisory committee responsibilities include:

- Designing or refocusing the grantee’s emergency response system
- Developing project outcome requirements
- Assessing the short- and long-term effectiveness of the project in addressing the needs of families, singles and youth who are homeless or at imminent risk of homelessness
- Monitoring of grantees and subgrantees, at a minimum, annually. Monitoring must include review of client records documenting eligibility and service provision. It should also include review of financial files for eligible expenses, invoicing and supporting documentation. Results should be shared with the grantee’s advisory committee (refer to Chapter 11: Grantee Requirements, Section 11.06: Monitoring and Evaluation)
- Identifying and developing innovative solutions to the barriers households experiencing homelessness or imminent risk of homelessness face and to provide services to address these barriers
- Helping ensure providers are offering culturally responsive services to those populations disproportionately impacted by homelessness
- Monitoring expenditures and helping ensure alignment with the approved budget
- Managing the rate of expenditures to last the duration of the biennium

Advisory committee meetings must be held, at a minimum, quarterly, although more frequent meetings are recommended. Meetings should occur at a time and location that allows for the greatest access by members and can include in person virtual or hybrid meetings to meet the community need.

#### **9.04 Bylaws**

Advisory committees must develop written bylaws that may include, but are not limited to:

- Meeting frequency and scope
- Membership composition, including both representatives from entities which receive FHPAP funding as well as other community partners
- New member recruitment and orientation
- Election of officers, length of terms, and job descriptions
- Voting process and quorum requirement
- Conflict of Interest

- Bylaws must include a conflict-of-interest statement or policy. Members must disclose their status and abstain from voting on any actions that present a conflict of interest. For example, subgrantees should abstain from voting on how much funding will be awarded to each subgrantee

### **9.05 Commitment to Equity**

Advisory committees should be committed to addressing inequities as they pertain to those populations disproportionately impacted by homelessness, and to targeting their homeless response system to address those inequities. Factors to consider:

- Identify and recruit potential subgrantees based in part on their ability to provide culturally specific services and whose staffing represents the population served; grantees may choose to provide technical assistance to assist an organization in planning for the development of a program under FHPAP in advance of their applying to be a subgrantee
- Providing technical assistance to new subgrantees in areas such as data collection and reporting, case file documentation, financial reporting, etc.
- Ensuring advisory committee members and subgrantees participate in equity training
- Ensuring advisory committee members are representative of populations served
- Engaging and partnering with Tribal Nations if they are located in an advisory committee's region
- Ensuring all people, regardless of their spoken or written language, literacy or disability status, may learn about, apply for and if applicable, receive FHPAP assistance
- If populations do not access services in a traditional manner, such as shelters or coordinated entry access points, providing alternative avenues to outreach and identifying those that need homeless or prevention assistance
- Persons with lived experience are engaged in an advisory committee's planning, implementation and evaluation and are provided stipends for their participation; note that stipends are an eligible FHPAP expense

Grantees and subgrantees are encouraged to be creative around other methods to engage with persons with lived experience throughout the duration of the grant term. For example, forming a work group or advisory subcommittee driven and led by persons with lived experience, conducting surveys that reach a broad population, establishing focus groups, etc.

## Chapter 10 – Preparing the Application

Minnesota Housing typically issues a Request for Proposals (RFP) in the early spring for the next grant cycle, which is every two years. Prior to the issuance of the RFP, FHPAP staff are available for consultation about how to design and structure the grant proposal. When the RFP is released, FHPAP staff are unable to provide consultation, except for technical issues related to the RFP, until the RFP period has closed. Potential applicants are encouraged to contact FHPAP staff prior to the RFP release date for technical assistance.

Minnesota Housing is interested in how the applicant fully engages its advisory committee and the community in its planning process. The application requests that applicants describe their program design and how it meets the needs of the community, including those disparately impacted by homelessness, whether it is aligned with CoC/Tribal priorities, and how FHPAP complements other funding resources in a particular region.

### 10.01 Planning

Minnesota Housing expects applicants to have developed a fair and transparent process for soliciting providers to meet the needs identified in their community. Applicants are expected to conduct the following activities:

- Conduct a needs assessment of homelessness and those at risk of homelessness in the applicant’s community, including the use of multiple data sources, analysis of trends, and comparison of homeless numbers and population types, past to present, including those populations disparately impacted by homelessness
  - It is recommended that the needs assessment be concluded a minimum of 120 days prior to the issuance of the Minnesota Housing FHPAP RFP to help ensure adequate time for data analysis and planning
- Engage Tribal governments (if in the service area) in discussions, planning and project design
- Engage other service and housing providers, agencies, local governments, and schools
- Engage people with lived experience in the planning, implementation, and evaluation of the program, such as conducting focus groups or administering surveys
- Plan for alignment with the CoC or Tribes, including coordinated entry and performance measures
- Develop strategies that meet the needs identified in the community needs assessment
- Identify additional funding resources that can be used to meet the local need, including philanthropic, other state funding, and federal resources
- Issue a local Request for Information (RFI) or RFP to regional providers of homeless and prevention services to solicit proposals

- Actively engage with a broad range of potential applicants, including those that target and whose staff represent culturally specific populations and those disproportionately represented in the homeless population. Engage potential applicants using multiple venues such as email, websites, social media, newspapers, mailings, radio, local cable programs, etc.
- Develop and implement a transparent process and criteria for selecting service providers (both grantees and subgrantees) best suited to implement strategies identified in the planning process
- If the project does not serve all three populations (families, singles and youth) the applicant must demonstrate that other funding resources are available to meet the needs of the population not served by FHPAP.
- Applicants are encouraged to continually monitor community need by analyzing local data sources such as the Coordinated Entry Priority List, HMIS, including the homeless dashboard, and other data. Point-in-Time Count (PIT), etc. and help ensure funds are being targeted to those households most likely to become homeless or to remain homeless without assistance.
- Applicants must not have more than 50% of their total FHPAP budget dedicated to supportive services; however, if the grantee can provide rationale, they can request to exceed the 50% cap in their competitive application. Justification to do so must be clearly described in the application and budget narrative. This is the only timeframe in which requests to exceed the 50% cap will be considered. An example where an applicant may request to exceed the cap includes increasing supportive services and decreasing direct financial assistance, such as rental assistance, if that assistance type is available through another funding source.
  - If requesting to exceed the supportive services cap, applicants should consult with and receive approval from their grantee’s advisory committee prior to submission of the application. Minnesota Housing will inform applicants selected for funding whether this request is approved or denied at the time of award.

## **10.02 Projecting Households Served**

When projecting the number and types of households (i.e., single adult, adult family, youth family, and unaccompanied youth) that will be served, applicants should:

- Factor in the number of households that will be carried over from the previous biennium, which should be included in the projection
- Utilize current program data, current trends, needs assessment feedback, etc. to determine the average length of time as well as the average amount of direct financial assistance households will need to resolve the crisis
- Consider the FTE equivalent of staff working directly with households, their average caseload, and the average length of time households will be in the program

### **10.03 Preliminary Practice Models**

Several state agencies and the [Heading Home Minnesota Funders Collaborative](#) (Funders Collaborative) identified key elements of a preliminary practice model ,for programs serving homeless or at risk of homeless households. Grantees are encouraged to identify which elements of the preliminary practice model are currently being practiced, in the process of being implemented, or not yet implemented. In addition, a preliminary practice model should identify at least one element for which there will be a plan for full implementation. Information sessions for several of the elements below can be found on the Homework Starts with Home [webpage](#).

#### **Equity Focus**

Because homelessness impacts specific groups at disproportionate rates (e.g., American Indians, African Americans, LGBTQI youth), effective responses must be attuned to the populations at greatest risk for homelessness. While these populations vary across communities, identifying specific strategies to help ensure that interventions for homeless individuals and families are representative of the populations being served and are culturally appropriate and responsive to the specific needs of those populations is critical. For example, applicants may explicitly monitor the impact of interventions for populations disproportionately impacted by homelessness and define essential roles for stakeholders representing those populations in the design and implementation of programs.

#### **Nothing About Us Without Us**

Individuals and families experiencing housing crises or homelessness have lived experience of how and where support systems are most effective and where they fail. Helping ensure that this expertise informs and guides community responses to homelessness can increase the likelihood of deploying resources more effectively, create shared ownership of solutions, and leverage the resilience of people who have experienced homelessness. For this to occur, individuals and families with lived experience of homelessness must have meaningful ways to participate in shaping and implementing a community’s response to homelessness. For example, applicants may create paid leadership and advisory positions for people with lived experience to help shape, implement and monitor programs serving families and individuals experiencing homelessness.

#### **Early Identification and Trauma-informed Responses**

Given the critical developmental needs of young people and the devastating impacts of homelessness and housing instability, the earliest identification of housing instability coupled with an affirmative response to those housing challenges can mitigate trauma that could otherwise occur. Often, implementing an effective response will require partnerships among entities that allow data sharing and deploy crisis-oriented resources to respond quickly to the specific circumstances of each individual or family. Given the traumatic nature of homelessness itself and the trauma that often precedes homelessness; these responses themselves must be trauma-informed and help support individuals and families in their recovery from trauma. For example, applicants may propose to conduct training for staff and community partners about

the relationship between homelessness and trauma and adopt programs to enhance their use of trauma-informed approaches.

### **Two-generational Approaches**

Two-generational (“2-Gen”) or whole-family approaches recognize that impacting outcomes for young people require supporting their parents, and vice versa. While many specific programs or funding streams focus on children or adults, 2-Gen approaches encourage looking at families holistically, focusing on outcomes that impact whole families, and whenever possible, combining programs and resources so that effective whole-family solutions are possible. 2-Gen approaches may include a mindset (e.g., considering parents and their children, not just one or the other), specific strategies (e.g., programs designed to support parents and children together), or systems-level organization (e.g., organizing services so that parents and children receive support simultaneously). For example, applicants may establish whole-family assessments of needs and strengths as part of routine intake processes for local social service and economic assistance programs, with connections made simultaneously for parents and their children to appropriate programs for which they are eligible.

### **Progressive Engagement**

A Progressive Engagement approach provides a structured way for services to be tailored dynamically to the specific and changing needs of individuals or families experiencing homelessness so that people receive the support that they need. At a systems level, this approach also ensures that resources are available to help support the greatest number of people possible. A Progressive Engagement approach involves assessing initial needs and providing modest support responsive to those needs. If that is sufficient to help the family stabilize, those supports can be continued or weaned as ongoing needs dictate. If initial supports are not sufficient, a Progressive Engagement approach identifies paths for increasing or diversifying the supports available. This process continues iteratively as long as needed until the family achieves stability. For example, applicants can structure most initial interventions as short-term responses and establish clear protocols for how services can be escalated, maintained, or discontinued as family needs dictate, including referral processes and data sharing agreements among service providers, as needed.

### **Housing First Orientation**

Access to permanent housing is the fundamental solution to homelessness. A Housing First approach honors this fact by reducing barriers to accessing housing so that housing itself can serve as a platform for addressing any other challenges that someone experiencing homelessness may face. This approach is contrasted with a “housing readiness” approach that defines preconditions (e.g., sobriety, income, compliance with services) prior to receiving support to access permanent housing. For example, applicants can regularly review and wherever possible revise eligibility requirements for housing and homelessness programs that may preclude people experiencing homelessness from gaining access to housing resources or supports.

**Leveraging Mainstream Resources**

Resources specifically intended to serve people experiencing homelessness provide important tools in effective community responses to homelessness, but they are small compared to mainstream programs serving low-income or vulnerable populations. Mainstream programs may include health programs, housing voucher or public housing programs, economic assistance, employment and training programs, or other social services designed to help people obtain stability or improve well-being. While these programs are typically not focused specifically on people experiencing homelessness, their impact for people experiencing homelessness can be significant, particularly if they implement strategies to make these programs accessible and responsive to people experiencing homelessness. Given the way that funding streams, outcomes, and lines of accountability are structured, linking mainstream programs to responses to homelessness often does not occur “naturally,” but instead requires deliberate action. For example, applicants can organize their responses to homelessness jointly with intake processes for mainstream economic assistance, public housing, or other resources, so that each family can be connected with whatever resource(s) is/are most responsive to the family’s needs.

**Continuous Improvement**

Adapting and implementing effective solutions to homelessness requires ongoing refinement and attention to evolving needs and opportunities. Rather than expecting that a proposed intervention is complete or optimal as it was initially designed, a continuous improvement approach recognizes that ongoing participation from all stakeholders to identify successes, areas for improvement, and unanticipated needs will result in a stronger and more resilient long-term implementation. For example, applicants can describe oversight and governance approaches that encourage routine reflection and engagement of leadership and all stakeholders to help improve the impact of existing services and to do so iteratively and continuously.

## **Chapter 11 – Grantee Requirements**

### **11.01 Subgrantees**

As outlined the Grant Contract Agreement, grantees must enter into formal contracts with subgrantees and impose, at a minimum, the same expectations that Minnesota Housing requires of grantees. Subgrantee agreements must be executed before the subgrantees can begin serving households. In addition, grantees should ensure that communication received from Minnesota Housing is relayed to subgrantees.

### **11.02 Financial**

Once the Grant Contract Agreement is approved and fully executed, except in those instances where Minnesota Housing identifies a risk with the advanced payment model, Minnesota Housing will issue the first quarterly payment to grantees and subsequently will advance payments each quarter thereafter. Quarterly payments are generally issued in advance to ease the financial burden on grantees, thus ensuring funds are available to households for the duration of the quarter. Grantees who are two or more quarters behind in their expenditures will be required to meet with Minnesota Housing staff to develop a plan to address their underspending. Minnesota Housing will not issue further advance payments until the grantee's rate of expenditures are within one quarter or less of the quarterly disbursed amount.

Subgrantees should not receive advanced payment; rather they should be required to submit an invoice with supporting documentation for services and assistance performed prior to receiving reimbursement from grantees.

Grantees are required to demonstrate the funds have been expended on eligible activities and should work with their financial staff to set up a recordkeeping system to track grant funds received and expended.

Grantees should not spend funds on a 'first come, first served' basis, rather they should prioritize households based upon need and budget their direct financial assistance expenditures throughout the quarter.

Grantees are required to monitor their rate of expenditures to last the duration of the grant period. The rate of expenditures will be considered when evaluating overall grantee performance as part of the competitive application process.

### **11.03 Digital/Electronic Signatures**

For any documents that require a signature to complete the application or other supporting documentation, and a wet/handwritten signature cannot easily be obtained in person, grantees may use [DocuSign](#) or [Adobe e-sign](#) to create a digital or electronic signature. Other digital or electronic signature software may be considered but requires written approval from Minnesota Housing before being used.



#### **11.04 Participation in Coordinated Entry**

A coordinated entry system represents the coordination and management of a CoC's/Tribes housing crisis response system. Coordinated entry enables CoC/Tribal providers and homeless assistance staff to make consistent decisions from available information in order to connect people in crisis, efficiently and effectively to interventions that will rapidly end their homelessness. The coordinated entry approach also aligns with state of Minnesota's goals to transform crisis response systems in order to improve outcomes for people experiencing a housing crisis. Grantees must consult with their local [CoC](#) and Tribe and follow the local coordinated entry policies in their service area.

#### **11.05 Household Income**

Grantees and subgrantees must determine income eligibility of households prior to providing assistance. Households must be at or below 200% of the federal poverty guidelines. Income is calculated based upon gross annual income.

##### **Determining Income**

The following income **is included** in income calculation:

- The full amount before payroll deductions of wages and salaries, overtime pay, commissions fees, tips, bonuses, and other compensation for personal services
- The full amount of periodic payments received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts
- Payments in lieu of earnings such as unemployment or disability compensation, worker's compensation and severance pay
- Public assistance payments such as cash assistance or Social Security.
- Periodic and determinable allowances received such as alimony, child support and foster care payments
- Net income from the operation of a business or profession

The following types of income are **not included** in income calculation:

- Earned income of minors (age 17 and under)
- Income of live-in health aids
- Non-cash benefits such as childcare or medical care assistance, and food support
- One-time cash gifts, for example a birthday
- Economic stimulus payments

A household making child support payments cannot have the amount of the payment reduced from their household income calculation, but in shared custody situations, may include the children as part of their household.

### **Verification of Household Income**

There are two methods to obtaining household income: documents provided by the household or third-party verification.

#### **1. Documents Provided by the Household**

When possible, documentation of income should be obtained from the household. This includes:

- If employed, obtain a minimum of two pay stubs. Pay stubs should be the most recent and just prior to the date the household is seeking assistance. If a household has inconsistent income, for example, they work varied hours, obtaining additional pay stubs is recommended.
- If a household reports they recently gained employment but have not yet been paid, this would not be included in their income calculation.
- Documentation of cash assistance received such as Social Security income or public assistance
- Documentation of child support, alimony or foster care payments

#### **2. Third-Party Verification**

Under this form of verification, a third party is contacted to provide information about the household's income. This may be preferable if providing the documentation poses a hardship on the household due to geographic distance, lack of access to technology, or they are unable to provide it in a timely manner.

To obtain third-party verification, the provider must obtain a signed release of information (ROI) from the applicant. Written verification is preferred; however, there may be times where the third party is unwilling to provide this and/or do so in a timely manner. In these instances, verbal verification is acceptable; however, this must be well documented in the household file, such as on intake paperwork or a case note. Information included should be the date the verbal verification was provided, the name of the individual providing the information and the entity they represent, as well as their contact information, along with staff signature (digital or electronic is acceptable) or initials.

If a household is without income, obtaining a signed, self-certification of zero income is encouraged; however, in cases when this is not possible, verbal verification will suffice, although this should be clearly documented in the household file, such as on intake paperwork or a case note.

### **Calculating Income**

When calculating income, keep in mind the following:

- Calculate annual income, rather than monthly, in order to align with the annual Federal Poverty Guidelines table
- Calculate annual income based upon 52 weeks in a year
  - For example, if a household is paid bi-weekly, their average bi-weekly pay should be multiplied by 26 weeks to obtain the annual income.
- Income calculation is determined using gross annual income, i.e., total pay before taxes and other deductions.

Below are examples on calculating income:

Income Calculation Examples	Income Calculation Steps
<p><b>Example #1:</b></p> <p>Household with two family members is employed and paid bi-weekly.</p> <p>Check #1: Gross income - \$589.32 Check #2: Gross income - \$640.00</p>	<p>Step 1: Total the two pay stubs - <math>\\$589.32 + \\$640 = \\$1229.32</math></p> <p>Step 2: Divide total in Step 1 by two (# of pay stubs) <math>\\$1229.32/2 = \\$614.66</math></p> <p>Step 3: Multiply \$614.66 by 26 weeks (bi-weekly average) <math>\\$614.50 \times 26 = \\$15,981.16</math></p> <p style="text-align: center;"><b>Household Annual Income (rounded) = \$15,981</b></p>
<p><b>Example #2:</b></p> <p>Household of two receives public cash assistance of \$583.00 per month and a housing allowance of \$110.00 per month</p>	<p>Step 1: Calculate monthly income <math>\\$583 + \\$110 = \\$693</math></p> <p>Step 2: Multiply total in Step 1 by 12 months <math>\\$693 \times 12 = \\$8316</math></p> <p style="text-align: center;"><b>Household Annual Income = \$8316</b></p>
<p><b>Example #3:</b></p> <p>Household has two adult family members and both have income.</p> <p>Head of Household #1 has employment and is paid weekly.</p> <p>Check #1: Gross income - \$723.00 Check #2: Gross income - \$888.24 Check #3: Gross income - \$646.29 Check #4: Gross income - \$881.00</p>	<p>Step 1: Total the four pay stubs <math>\\$823 + \\$688.24 + \\$746.29 + \\$881.00 = \\$2538.53</math></p> <p>Step 2: Divide the total in Step 1 by four <math>\\$3138.53/4 = \\$784.63</math> (average weekly income for last 4 weeks)</p> <p>Step 3: Multiply \$784.63 by 52 weeks <math>\\$784.63 \times 52 = \\$40,000.76</math></p>

Income Calculation Examples	Income Calculation Steps
<p><i>(In this example, because weekly income amounts vary, the provider requested additional pay stubs)</i></p> <p>Adult #2 earns monthly social security benefits in the amount of \$941.00</p>	<p><u>Annual income for head of household #1 = \$40,000.76</u></p> <p>Step 4: To figure Adult #2 annual income, multiply  <math>\\$941 \times 12 \text{ months}</math>  <math>\\$941 \times 12 = \\$11,292</math></p> <p><u>Annual income for Adult #2 = \$11,292</u></p> <p>Step 5: Determine combined annual income  <math>\\$40,000.76 + \\$11,292 = \\$51,292.76</math></p> <p><b>Household Annual Income = \$51,292.76</b></p> <p><i>In this example, the household does not qualify for FHPAP assistance as their income exceeds 200 % of federal poverty guidelines for a household with two members</i></p>

Minnesota Housing has an Income Calculation Workbook located on the [FHPAP webpage](#) that can be used to calculate household income. While use of this tool is not required, it may save staff time and be helpful in determining accurate income and may be beneficial for monitoring purposes where demonstration of income is required.

**Reassessing income**

For households receiving services or direct financial assistance six months or longer, household income should be reassessed, at a minimum, once every six months to determine if the household remains eligible for FHPAP assistance.

**Roommates**

When two or more people live together as roommates, i.e., sharing a living space and not as a family or in a committed relationship, and one or more of the roommates is seeking FHPAP assistance, their income eligibility can be considered on an individual basis. If the roommates are listed on one lease, the amount of assistance an individual is eligible for would generally be proportional, i.e., if there are two roommates, the individual seeking assistance would be eligible for 50% of the amount owed. If a roommate can demonstrate they have consistently been paying a higher portion, they could be eligible for a higher amount of assistance. In this instance, for example, they could present copies of checks or the landlord could verify the amount paid. Documentation of roommate situations where only one individual is receiving FHPAP assistance should be clearly noted in the household file, such as case notes or an intake form.

**11.06 Monitoring and Evaluation**

### Monitoring of Grantees and Subgrantees

Grantees are required to conduct site visits and monitor subgrantee activities, project results, expenditures, and outcome indicators, at a minimum, once per year. In addition, if a grantee is an FHPAP provider, the advisory committee must monitor the grantee a minimum of once per year. Outcomes of the monitoring visit must be communicated to the advisory committee and other stakeholders. The advisory committee must develop a written monitoring and evaluation plan to include:

- Advisory committee role with monitoring and evaluation
- How reports and results will be shared with the advisory committee
- How HMIS data quality review will be conducted
- How non-HMIS data will be collected and reported (if applicable)
- How site visits will be conducted
- How household file reviews will be conducted
- How financial reviews will be conducted
- Sample report, site visit and file review templates

### Household Files

At a minimum, household files should contain the following:

- An application/intake date for the household seeking assistance
- Consent and release forms including:
  - A signed [HMIS Data Privacy Notice and Release of Information](#) for all household members over age 18
- A separate, signed [Tennessee warning](#) that lists Minnesota Housing for reach adult member of the household
- A separate ROI for each individual or entity (for example, do not include a utility company and a landlord on the same ROI). An ROI should include:
  - The name and organization from which information can be shared and/or requested
  - Specific information that can be provided and/or requested
  - An expiration date of one year or less
  - A participant/household signature and date
  - It is recommended that a staff member also sign and date the ROI
  - A separate ROI for each adult in the household should be obtained
- Case notes that are objective, chronological, accurate, concise, timely, and demonstrate action steps and outcomes

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- Documentation of eligibility criteria including:
  - The household is at or below 200% of federal poverty guidelines. In addition to providing documentation of income, such as pay stubs or a statement of benefits, a demonstration of how annual income was calculated should be in the household file. If utilizing the Income Calculation Workbook, providing a copy of this in the household file will suffice for demonstration of income calculation. Refer to Section 11.05: Household Income. The household is experiencing a housing crisis:
    - For households at imminent risk of homelessness, documentation provided can include an eviction notice, utility shut-off notice, notice to vacate due to past due rent, etc.
    - For homeless households, providing evidence of the household's homeless status, for example a coordinated entry referral meets this requirement
  - Documentation that the household does not have funds to pay for the crisis
    - This can be documented on an intake form, case note, etc.
    - For past due rent, a rental ledger that indicates the amount owed, including late fees
      - If the amount owed has increased since the past due statement was submitted, clearly note this in the file including the name of the person from the utility company who verified the increase/past due notice, the date verification was received and the updated past due amount
    - For prepayments of propane and wood, an invoice
    - For move in assistance including rental deposit and rental assistance, and ongoing rental assistance, a fully executed lease signed by both landlord and tenant
  - The type and amount of FHPAP assistance provided
    - Evidence can include a purchase order, agency check request, or check copy
    - The household should receive the total amount of financial assistance needed to resolve the housing crisis; if FHPAP is not used to pay for the full amount needed by the household, clearly indicate in the file the source of the additional funding and amount provided to resolve the crisis
  - Documentation of crisis resolution
    - This can be included in closing paperwork, a case note, etc.

While many rental assistance programs require a housing inspection prior to move in, for example a Housing Quality Standards (HQS) inspection, this inspection is not an FHPAP requirement.

Grantees will be required to provide Minnesota Housing with a summary on the Annual Narrative Report; however, grantees are strongly encouraged to consult with Minnesota Housing staff in a timely manner any concerns that arise regarding the performance of a

subgrantee, through monitoring or any other means, in areas such as financial management or service delivery. Further action may be recommended or required, such as providing additional monitoring or developing a performance improvement plan with the subgrantee.

### **State Monitoring of Grantees**

Grantees and subgrantees are responsible for maintaining financial records that document the use of all FHPAP funds, including those used for supportive services, direct financial assistance, and administrative costs. Grantees and subgrantees are expected to maintain all financial and household records for a minimum of six years after the grant term has ended.

In addition, Minnesota Housing reserves the right to review financial and household records during this period, and records must be made available upon request.

### **Minnesota Housing**

Minnesota Housing will conduct annual monitoring of grantees, which will include:

- Household file monitoring (refer to the Household Files section, above); household files selected for file review will be randomly selected.
- Financial reconciliation: Grantees will be required to submit the following documentation:
  - A job cost report or general ledger, including receipts and expenses for the requested time period; the job cost report or general ledger should only include FHPAP related receipts and expenses and should not list non-FHPAP related receipts/expenses
  - Bank statements
  - Payroll records
  - Third-party verification such as invoices and receipts

More detailed information will be provided prior to monitoring

- Overall program review, including grantee policies and procedures, governance, and administrative performance

Following conclusion of the household file monitoring, financial reconciliation, and program review, Minnesota Housing staff will conduct an exit interview with the grantee summarizing the results. Grantees will be notified if follow-up is required. An example of follow-up includes obtaining additional documentation to verify household eligibility. Upon timely completion of follow-up items, Minnesota Housing staff will issue a monitoring review summary letter that includes grantee strengths, areas of concern, recommendations, and requirements.

## **11.07 Reporting**

Timely and accurate reporting requirements are considered when evaluating overall grantee performance. Refer to Appendix A: FHPAP Biennial Timeline, for due dates.

### **Quarterly Expenditure and Outputs Report**

Grantees will be provided with a Quarterly Expenditure and Outputs Report template that must be submitted after the completion of each reporting period. Reports will include expenses by funding category and the number of households and individuals served. Homeless households that are doubled up should be entered in the same category that grantees and subgrantees are using to enter their data in HMIS, i.e., Rapid Rehousing Doubled Up or Prevention. Refer to Section 11.09: Homeless Management Information System (HMIS), Entering doubled up households in HMIS, for more detail.

Grantee outputs should match the HMIS report. Occasionally HMIS data issues arise that may impact the reporting timeline, and if this occurs, grantees should notify Minnesota Housing staff as soon as possible.

### **HMIS Reports**

The HMIS administrator creates grantee level and statewide FHPAP reports prior to the due date of the submission of the expenditure and outputs report to Minnesota Housing. Grantees should allow time to review the accuracy of their HMIS reports prior to submission of the quarterly expenditure and output reports.

It is recommended that grantees establish an HMIS reporting deadline for subgrantees in advance of the due date established by Minnesota Housing in order to provide sufficient time to review data quality. Grantees should work with their subgrantees to fix data quality issues and then inform Minnesota Housing of the “ready” status. Grantees may also act as a liaison between the subgrantee and HMIS administrator helpdesk staff if there are data or reporting issues. The reports currently include:

- Core Report
- FHPAP Supplemental Report

### **Narrative Reports**

Narrative and outcome reports are submitted to Minnesota Housing annually. Minnesota Housing will provide the report format to grantees in advance of the report deadline.

## **11.08 Outcomes and Outputs**

Minnesota Housing will measure progress toward the specific outcomes listed below and is particularly interested in the outcomes and improvement over time for households disparately impacted by homelessness and housing instability. Grantees and their advisory committees should regularly review and analyze this data, and implement strategies where needed to improve upon them. The indicators will be pulled from data in HMIS as outlined below.

### **Outcomes**



- **Outcome #1:** The percentage of households receiving assistance who do not experience homelessness, broken down by race, ethnicity and household type (HUD definition) (*Prevent*)
- **Outcome #2:** The percentage of households who exit to permanent, stable housing, broken down by race, ethnicity and household type (*Rare*)
- **Outcome #3:** The length of time from enrollment to housing placement, broken down by race, ethnicity and household type (*Brief*)
- **Outcome #4:** The percentage of households served who do not return to homelessness, broken down by race, ethnicity and household type (*One-time*)
- **Outcome #5:** Demographics of the households served at program intake compared to demographics of households served at program exit (e.g., is the program experiencing equitable outcomes for Native American households compared to Caucasian households?) (*Equity*)

### Outputs

- The number of households served by race, ethnicity and household type

Grantees may choose to establish additional outcomes that reflect their local program. Grantees will be asked to discuss the results of these outcome indicators in the narrative report(s).

## 11.09 Homeless Management Information System (HMIS)

Information for most households served will be entered into HMIS. Exceptions are noted below. Data collection forms for FHPAP projects can be found on the [HMIS website](#).

Grantees and subgrantees are encouraged to download these forms on a regular basis to ensure the latest version is being used. Timely data entry is expected in order to comply with quarterly and annual reporting requirements. Grantees are required to review and analyze their program's HMIS data for accuracy and program evaluation. Refer to Section 11.07: Reporting.

### Quarterly Data Quality

In an effort to improve the quality of HMIS data, the HMIS administrator, with support from CoCs, the Minnesota Tribal Collaborative, and state partners, has implemented a Quarterly Data Quality (QDQ) evaluation process. Grantee and subgrantee participation are required. Providers receive a data quality score, i.e., to what extent they meet the criteria for accuracy, completeness, consistency, and timeliness of reporting. This is an interactive process. Providers receive support from all monitoring partners and will have the opportunity to make data quality corrections prior to receiving their score. Refer to the [HMIS website](#) for more information.

### Data Entry Expectations

### Entry and Exit

Best practice for HMIS data entry is that households should be entered into HMIS no more than seven days after program entry as well as program exit. Grantees should be mindful of and may develop their own data entry and reporting requirements to help ensure there is adequate time to review data prior to submitting the quarterly Expenditure and Outputs Report and Annual Narrative Report.

### Activities

Below are **minimum** requirements for when households should be entered into HMIS:

- **Coordinated Entry**
  - When a household is assessed and based upon their score, is referred to an FHPAP provider for Prevention or Rapid Rehousing services or direct financial assistance.
- **Street Outreach**
  - When services extend beyond the simple provision of referral resources and is a strategic effort to engage the participant in activities designed to end their homeless situation. For example, if an individual receives assistance completing housing applications or is driven to a homeless shelter, *and/or* service delivery involves multiple contacts or requires a significant amount of time. Grantees have some discretion in determining whether a household should be entered; however, the policy for doing so should be consistent, keeping in mind that proposed numbers served are compared with HMIS outputs only.
- **Prevention**
  - When a household receives FHPAP supportive services or direct financial assistance
- **Rapid Rehousing**
  - All households are required to be entered into HMIS with the exception of households being served by domestic violence providers. In this instance reporting to Minnesota Housing will occur outside of HMIS.

### Entering doubled up households in HMIS

One variation of the state of Minnesota's definition of homelessness compared to HUD's definition, is that households doubled up that are at imminent risk of housing loss are considered homeless by the state of Minnesota. Since HMIS definitions are set up to align with HUD, grantees will enter FHPAP households that are doubled up in the **Prevention** category within HMIS.

### Grantees and subgrantees new to HMIS

Agencies new to HMIS or returning after a period of absence must complete documentation to get their agency set up to enter data. In addition, new users must complete new user training before entering data. Visit the following link for more information: [New to HMIS](#)

## Chapter 12 – Fair Housing Policy

It is the policy of Minnesota Housing to affirmatively further fair housing in all its programs so that individuals of similar income levels have equal access to Minnesota Housing programs, regardless of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, disability, familial status, gender identity or sexual orientation.

Minnesota Housing's fair housing policy incorporates the requirements of Title VI of the Civil Rights Act of 1968; the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988; and the Minnesota Human Rights Act. Housing providers and other entities involved in real-estate related transactions are expected to comply with the applicable statutes, regulations, and related policy guidance. Housing providers should ensure that admissions, occupancy, marketing and operating procedures comply with non-discrimination requirements. Housing providers and other entities involved in real-estate related transactions must comply with all non-discrimination requirements related to the provision of credit, as well as access to services.

In part, the Fair Housing Act and the Minnesota Human Rights Act make it unlawful, because of protected class status, to:

- Discriminate in the selection/acceptance of applicants in the rental of housing units;
- Discriminate in the making or purchasing of loans for purchasing, constructing or improving a dwelling, or in the terms and conditions of real-estate related transactions;
- Discriminate in the brokering or appraisal of residential property;
- Discriminate in terms, conditions or privileges of the rental of a dwelling unit or services or facilities;
- Discriminate in the extension of personal or commercial credit or in the requirements for obtaining credit;
- Engage in any conduct relating to the provision of housing that otherwise make unavailable or denies the rental of a dwelling unit;
- Make, print or publish (or cause to make, print or publish) notices, statements or advertisements that indicate preferences or limitations based on protected class status;
- Represent a dwelling is not available when it is in fact available;
- Refuse to grant a reasonable accommodation or a reasonable modification to a person with a disability;
- Deny access to, or membership or participation in, associations or other services organizations or facilities relating to the business of renting a dwelling or discriminate in the terms or conditions of membership or participation; or

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- Engage in harassment or quid pro quo negotiations related to the rental of a dwelling unit.

Minnesota Housing has a commitment to affirmatively further fair housing for individuals with disabilities by promoting the accessibility requirements set out in the Fair Housing Act, which establish design and construction mandates for covered multifamily dwellings and requires housing providers to make reasonable accommodations and to allow persons with disabilities to make reasonable modifications.

Applicants will be required to submit an Affirmative Fair Housing Marketing Plan at the time of application, to update the plan regularly and to use affirmative fair housing marketing practices in soliciting renters, determining eligibility and concluding all transactions.

As a condition of funding through Minnesota Housing, housing providers are not permitted to refuse to lease a unit to, or discriminate against, a prospective resident solely because the prospective resident has a Housing Choice Voucher or other form of tenant-based rental assistance.

## **Chapter 13 – Fraud, Misuse of Funds, Conflict of Interest, Suspension, and Disclosure and Reporting**

### **13.01 Conflict and Control**

In the event of any conflict between the terms of this Addendum and the document to which it is attached, the terms of this Addendum will govern and control.

### **13.02 Fraud**

Fraud is any intentionally deceptive action or omission made for personal gain or to damage another.

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing and witnesses, discovers evidence of, receives a report from another source, or has other reasonable basis to suspect that fraud or embezzlement has occurred must immediately make a report through one of the communication channels described in section 13.06.

### **13.03 Misuse of Funds**

A contracting party that receives funding from Minnesota Housing promises to use the funds to engage in certain activities or procure certain goods or services while Minnesota Housing agrees to provide funds to the recipient to pay for those activities, goods or services. Regardless of the Minnesota Housing program or funding source, the recipient must use Minnesota Housing funds as agreed and the recipient must maintain appropriate documentation to prove that funds were used for the intended purpose(s).

A misuse of funds shall be deemed to have occurred when: (1) Minnesota Housing funds are not used as agreed by a recipient; or (2) A recipient cannot provide adequate documentation to establish that Minnesota Housing funds were used in accordance with the terms and conditions of the contract.

Any recipient (including its employees and affiliates) of Minnesota Housing funds that discovers evidence, receives a report from another source, or has other reasonable basis to suspect that a misuse of funds has occurred must immediately make a report through one of the communication channels described in section 13.06.

### **13.04 Conflict of Interest**

A conflict of interest, actual or potential, occurs when a person has an actual or apparent duty or loyalty to more than one organization and the competing duties or loyalties may result in actions which are adverse to one or both parties. A conflict of interest exists even if no unethical, improper or illegal act results from it.

An individual conflict of interest is any situation in which one’s judgment, actions or non-action could be interpreted to be influenced by something that would benefit them directly or through indirect gain to a friend, relative, acquaintance or business or organization with which they are involved.

Organizational conflicts of interest occur when:

- A contracting party is unable or potentially unable to render impartial assistance or advice to Minnesota Housing due to competing duties or loyalties
- A contracting party’s objectivity in carrying out their responsibilities might be otherwise impaired due to competing duties or loyalties
- A contracting party has an unfair competitive advantage through being furnished unauthorized proprietary information or source selection information that is not available to all competitors

Once made aware of a conflict of interest, Minnesota Housing will make a determination before disbursing any further funds or processing an award. Determinations could include:

- Revising the contracting party’s responsibilities to mitigate the conflict
- Allowing the contracting party to create firewalls that mitigate the conflict
- Asking the contracting party to submit an organizational conflict of interest mitigation plan
- Terminating the contracting party’s participation

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing must avoid and immediately disclose to Minnesota Housing any and all actual or potential conflicts of interest through one of the communication channels described in section 13.06.

A contracting party should review its contract and Request for Proposals (RFP) material, if applicable, for further requirements.

### **13.05 Suspension**

By entering into any contract with Minnesota Housing, a contracting party represents that the contracting party (including its employees or affiliates that will have direct control over the subject of the contract) has not been suspended from doing business with Minnesota Housing. Please refer to Minnesota Housing’s website for a list of [suspended individuals and organizations](#).

### **13.06 Disclosure and Reporting**

Minnesota Housing promotes a “speak-up, see something, say something” culture whereby internal staff must immediately report instances of fraud, misuse of funds, conflicts of interest,

or other concerns without fear of retaliation through one of the communication channels listed below. External business partners (e.g., administrators, grantees, or borrowers) and the general public are strongly encouraged to report instances of fraud, misuse of funds, conflicts of interest, or other concerns without fear of retaliation using these same communication channels.

- Minnesota Housing’s Chief Risk Officer
- Any member of Minnesota Housing’s [Servant Leadership Team](#)
- [EthicsPoint](#), the Minnesota Housing hotline reporting service vendor

### **13.07 Electronic Signatures**

Minnesota Housing accepts electronic signatures (eSignatures) on certain documents to the extent the person signing complies with all applicable state and federal electronic signature laws, as well as any counterparty requirements. Questions regarding which documents Minnesota Housing permits to be signed electronically should be directed to Minnesota Housing staff. However, note that Minnesota Housing does not permit eSignatures on any document that needs to be recorded with the county. In addition, a contracting party cannot be required to use electronic signatures.

### **13.08 Prevailing Wage**

Under certain circumstances, awards of Minnesota Housing funds may trigger state prevailing wage requirements under [Minn. Stat. § 116J.871](#). In broad terms, the statute applies to awards that meet the following conditions: (1) new housing construction (not rehabilitation); and (2) a single entity receives from Minnesota Housing \$200,000 or more of grant proceeds or \$500,000 of loan proceeds. The statute excludes new housing construction in which total financial assistance at a single project site is less than \$100,000.

Please note the following statutory provisions:

- A state agency may provide financial assistance to a person only if the person receiving or benefiting from the financial assistance certifies to the commissioner of labor and industry that laborers and mechanics at the project site during construction, installation, remodeling, and repairs for which the financial assistance was provided will be paid the prevailing wage rate as defined in section [177.42, subdivision 6](#) and [Minn. Stat. § 116J.871, subd. 2](#).
- It is a misdemeanor for a person who has certified that prevailing wages will be paid to laborers and mechanics under subdivision 2 [see above] to subsequently fail to pay the prevailing wage. Each day a violation of this subdivision continues is a separate offense. [Minn. Stat. § 116J.871, subd. 3](#).

In addition, a separate prevailing wage statute, [Minn. Stat. § 177.41](#), [Minn. Stat. § 177.42](#), and [Stat. § 177.43](#), may apply if funds are used for a building that is publicly owned or leased.

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All questions regarding state prevailing wages and compliance requirements should be directed to the Department of Labor and Industry as follows:

Division of Labor Standards and Apprenticeship  
Karen Bugar, State Program Administrator  
443 Lafayette Road N, St. Paul, MN 55155  
651.284.5091 or [dli.prevwage@state.mn.us](mailto:dli.prevwage@state.mn.us)



**Appendix A: Example FHPAP Biennial Timeline**

<b>Year 1</b>	
October 1	Biennium begins
Fourth Monday in October	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
October	Annual Grantee Meeting – Location and exact date TBD
Fourth Monday in January	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
Second Friday in February	Quarter 1 Expenditure and Outputs Report due
Fourth Monday in April	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
Second Friday in May	Quarter 2 Expenditure and Outputs Report due
	Six Month HMIS Report due
Fourth Monday in July	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
Second Monday in August	Quarter 3 Expenditure and Outputs Report due
<b>Year 2</b>	
Fourth Monday in October	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
October	Annual Grantee Meeting – Location and exact date TBD
Second Friday in November	Quarter 4 Expenditure and Outputs Report due
	Annual Narrative Report due
	Annual HMIS Report due
Fourth Monday in January	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
February	Request for Proposals (RFP) Published / Information Session
Second Friday in February	Quarter 5 Expenditure and Outputs Report due
Fourth Monday in April	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
Second Friday in May	Quarter 6 Expenditure and Outputs Report due
	18-month HMIS Report
May	<i>FY 22-23 RFP applications due (Tentative)</i>
Fourth Monday in July	Quarterly Coordinator’s teleconference 10-11:30 a.m. CT
Second Friday in August	Quarter 7 Expenditure and Outputs Report due
Second Friday in November	Quarter 8 Expenditure and Outputs Report due

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Second Friday in November	Final Narrative Report due
Second Friday in November	Final HMIS Report due

Grantees will receive an FHPAP Timeline with specific dates that will be included as an exhibit to the Grant Contract Agreement. Note that report dates are subject to change. Grantees will receive email notifications of all report deadlines. Shaded rows indicate expenditure, outputs, and HMIS report due dates.