



# **COVID-19 Emergency Rental Assistance Housing Stability Services Program Guide**

*January 2022*



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## Chapter 1 – Introduction and Commitment to Equity

Congress established an Emergency Rental Assistance (ERA) program administered by the U.S. Department of the Treasury to distribute critical assistance to millions of Households at risk of losing their homes. The American Rescue Plan Act enacted in March 2021 provided additional funds for the ERA program known as ERA 2. The U.S. Department of the Treasury allows for up to 10% of the total ERA 2 funds received to be used to fund authorized Housing Stability Services. As of the date of the initial approval of this Guide, Minnesota Housing is using up to \$9 million of ERA 2 to fund Housing Stability Services. The federal assistance number assigned to the Program is 21.023.

The goal of this Program is to increase services statewide to prevent and reduce experiences of homelessness for individuals and families to enable eligible households to maintain or obtain rental housing. These Housing Stability Services funds may be used for eligible activities, which include eviction prevention and housing navigation. Grant Administrators include tribal nations, nonprofits, cities, and counties.

Housing Stability Services funding must be used to assist low-income renter households but **may not be used for any direct housing expenses** such as rent, mortgage, utilities, or other housing related costs.

### Commitment to Equity

One of Minnesota Housing’s values states, “We will be inclusive, equitable and just in our actions.” This not only includes supporting a new state Plan to Prevent and End Homelessness that focuses on racial, housing and health justice, but it extends to Minnesota Housing’s funding commitments as well.

To further address the racial disparities that exist within Minnesota’s homeless population, Minnesota Housing prioritizes working with Grant Administrators that can be most successful at improving housing stability for communities disproportionately impacted by homelessness, including those who can help ensure that their programs will offer culturally specific services.

## Chapter 2 – Eligibility Criteria

### 2.01 Eligible Grant Administrators

Grant Administrators will have demonstrated experience working with populations that are most likely to benefit from these Housing Stability Services to help resolve their housing instability.

Eligible Grant Administrators include, but are not limited to:

- Nonprofit/community-based organizations including legal services organizations
- Federally recognized tribes in Minnesota
- Local units of government (cities, counties, public housing authorities (PHAs), housing and redevelopment authorities (HRAs), etc.) that operate as a central resource for housing assistance and will have staff perform this work in the field, such as in homes, businesses and/or community centers.

Collaborative applications, including those from Continuum of Care regions or tribal nations, are encouraged. Organizations whose leadership, staff, and board reflect the demographics of those served will receive additional points in the application process.

The geographic service area of the Grant Administrator must include one or more of the following, at a minimum:

- The entire state of Minnesota
- One or more Continuum of Care regions
- One or more Community Action Program (CAP) regions
- One or more metro counties
- One or more Minnesota Indian Reservations/Communities
- One or more cities with populations greater than 85,000 (Minneapolis, St Paul, Rochester, Bloomington, and Duluth)

### 2.02 Eligible Service Recipients

To qualify for services under this Program, Households must meet all criteria listed below for the purposes of obtaining or maintaining rental housing:

Households	Eligibility Criteria
1. Be a low-income renter in Minnesota	Renter Households must be at or below of 80% AMI for their location (metro area or non- metro county), as set by the most current <a href="#">U.S. Department of Housing and Urban Development Income Limits</a> .

Households	Eligibility Criteria
	Household income will be verified to establish eligibility in Minnesota. Note: Verification forms will be provided by Minnesota Housing.
2. Household member(s) has(have) experienced a financial hardship.	A Household may demonstrate financial hardship through a written attestation, which includes qualification for unemployment benefits, a decrease in income, an increase in expenses or other financial hardship.
3. Household member(s) demonstrate(s) a risk of experiencing housing instability or homelessness	A Household may demonstrate risk of housing instability and/or homelessness through a written attestation, which may include risk of eviction, lease termination, or other financial impacts.

### 2.03 Eligible Services/Expenses for Grant Administrators

#### Eligible Services

- Eviction Prevention Services (refer to Chapter 3 for definitions and further details)
- Housing Navigation Services (refer to Chapter 3 for definitions and further details)

#### Eligible Program Related Expenses

- Salary and benefits
- Travel/Mileage
- Office/Computer/Phone for staff providing services to Households (note that costs allocated must be pro-rated to align with the staffing full time equivalent (FTE) assigned to the grant)
- Training of staff for program activities
- Marketing/Outreach (materials, advertising, etc.)
- Technology
- Personal Protective Equipment

#### Eligible Administration Expenses (cannot exceed 15% of the total grant amount)

- Audit/Accounting
- Human Resources
- Office/Computer/Phone for administrative staff supporting this Program
- “Other” direct costs associated with administering the Program (e.g. financial, Program management, data/reporting costs)

**NOTE:** Approved expenses will be reimbursed on a monthly basis by invoiced billing submitted by the Grant Administrator. All invoices must provide sufficient supportive documentation (e.g. payroll reports, receipts) for eligible program related expenses and administration expenses. In addition, any cost listed under “Other” must be clearly identified. Other expenses will be approved only at Minnesota Housing’s sole discretion.

**Ineligible Expenses**

Grant Administrators may not use funds for any direct assistance such as payment for rent, mortgage, utilities, or other housing related costs. Funds are for services only.

## Chapter 3 – Housing Stability Services

Minnesota Housing solicited input from both service providers and constituents to help determine which allowable services might be most needed by and beneficial to Minnesotans seeking Housing Stability Services. After analyzing the nearly 1,300 responses, the data showed (1) Eviction Prevention and (2) Housing Navigators, were the two most requested services.

Additionally, the data also showed that *how* these services are provided is critical to the success of the person receiving the services. Consequently, Grant Administrators were asked to describe how staff will serve constituents with empathy, respect, and dignity, and with a commitment to consistent and timely follow-up with Households.

### Eviction Prevention

Eviction prevention is intended to assist Households in maintaining permanent rental housing. Service strategies are focused on addressing the immediate housing crisis and can be integrated with other mainstream resources to address more long-term needs. This Program is designed to assist Households who are at imminent risk of homelessness including those who are sharing the housing of other persons due to loss of housing, or economic hardship (doubled up).

Eviction diversion is an eviction prevention strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternative housing arrangements and connecting them with services and financial assistance to help them return to permanent housing. (**NOTE:** These Program funds may not be used for direct financial assistance to or on behalf of Households.) Diversion programs can reduce the number of Households becoming homeless, the demand for shelter beds, and the size of program waiting lists.

Eviction prevention services include:

- Outreach and engagement: Connect with Households not currently accessing services
- Assessment: Work collaboratively with Households to identify strengths, resources, barriers, and needs in the context of their local environment
- Connection: Obtain for the Household necessary mainstream services, benefits, treatment, legal services, and supports
- Coordination: Bring together all the service providers in order to integrate services and help ensure consistency of service plans
- Housing counseling: Provide services to the person, including budget counseling and tenant education
- Conflict mediation: Provide proactive engagement and mediation services with landlords
- Personal and legal advocacy: Intercede on behalf of the Household to help ensure access to timely and appropriate services

- Follow-up: Maintain contact with the Household after completion of services to track stability and provide additional services, if needed

Eviction prevention references that may be helpful:

*Closing the Front Door: Creating a Successful Diversion Program for Homeless Families, National Alliance to End Homelessness*

<http://endhomelessness.org/wp-content/uploads/2011/08/creating-a-successul-diversion-program.pdf>

*Homelessness Prevention Creating Programs that Work, National Alliance to End Homelessness*

[http://b.3cdn.net/naeh/e151d425e2742e3e3b\\_0rm6btoc6.pdf](http://b.3cdn.net/naeh/e151d425e2742e3e3b_0rm6btoc6.pdf)

### **Housing Navigation**

Housing navigators help Households find rental housing opportunities, complete the application process, as well as help conduct landlord outreach and engagement.

While identified as a need from both service providers and constituents, housing navigation services was also a need identified in the Report of the Governor's Task Force on Housing (August 2018). The role of the housing navigator is to minimize the number of days of homeless by assisting the Household in obtaining rental housing as quickly as possible. If considering requesting funds for housing navigation, note that while services may be short-term, they are intensive in nature and usually involve multiple contacts, including face-to-face meetings with the Household, and involve much more than the simple provision of housing listings.

Activities of housing navigation services may include:

- Landlord recruitment, including outreach to an organization's network of existing landlords
- Utilizing housing search engines to locate opportunities
- Consistent communication with landlords to maintain a positive relationship and mitigate any issues that may arise
- Assisting survivors of domestic abuse or human trafficking with housing-related services
- Assisting Households in completing housing applications
- Assisting Households in obtaining application fees, if needed (these Program funds may not be used for this or any other housing related expense)
- 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

- Following up with Households to track stability and provide additional services after exiting the Program as requested by the household.

**Identifying Households to Serve**

Grant Administrators may conduct outreach to market their Housing Stability Services to potential Households. While such outreach may target certain populations, a Grant Administrator cannot limit and must serve any Household that meets the three Program requirements and that requests services. Grant Administrators may also receive referrals from community sources such as the Coordinated Entry.

## Chapter 4 – Grant Administrator Requirements

### 4.01 Contract Requirements

Grant Administrators are required to:

- Execute one or more Grant Contract Agreements with Minnesota Housing outlining the scope of services to be provided. The Grant Administrator may also be responsible for completing proposal and budget revisions or other exhibits (such as a work plan) that will become attachments to the Grant Contract Agreement(s).
- Maintain financial records for a minimum of six years after the Grant Contract Agreement(s) ends that document the use of all Program funds awarded. Minnesota Housing, at its sole discretion, may request to review the accounting and documentation of such records at a site visit or at other times.
- Maintain household records for at least six years after the Grant Contract Agreement(s) has ended. File documentation for household records must include an application/intake form, a signed Tennessee warning that lists Minnesota Housing, a signed release of information (ROI) form indicating all entities that may be contacted, proof of income eligibility, and evidence of services provided. Minnesota Housing, at its sole discretion, may request to review the accounting and documentation of such records at site visits or at other times.
- Complete and submit all monthly invoices and required reports on time using a template provided, and in a manner determined by, Minnesota Housing. Required reporting elements are subject to guidance by the U.S. Treasury Department, which may evolve over the course of the grant term.
- Have a written conflict of interest policy and take necessary steps to prevent individual and organizational conflicts of interest. All suspected, disclosed, or discovered conflicts of interest must be reported to Minnesota Housing in a timely manner.
- Comply with applicable contracting and bidding requirements noted in the Grant Contract Agreement(s).
- Comply with all affirmative action and non-discrimination requirements noted in the Grant Contract Agreement(s).
- Comply with Minn. Stat. §201.162 by providing voter registration services for employees and for the public serviced by the Grant Administrator.
- Comply with all applicable state statutes, rules and policies.
- Comply with all federal requirements and guidance that applies to the federal Emergency Rental Assistance program, including specific requirements that will be included in the Grant Contract Agreement(s).

#### **4.02 Subgrantees**

If utilizing subgrantees, Grant Administrators are expected to enter into formal agreements with subgrantees and impose, at a minimum, the same expectations that Minnesota Housing requires of Grant Administrators and must follow all applicable federal requirements under Uniform Guidance at 2 C.F.R. §200 and through Treasury guidance. In addition, Grant Administrators must ensure that communication received from Minnesota Housing is relayed to subgrantees. Grant Administrators remain responsible for compliance with all requirements and for performance of any subgrantees. Entering into agreement with subgrantees after contracts are executed must be approved by Minnesota Housing in advance of procurement.

#### **4.03 Monitoring and Evaluation**

##### **Monitoring of Grant Administrators and Subgrantees**

Minnesota Housing will monitor Grant Administrators for adherence to contract and Program requirements through household files, expenditures, and program expectations.

Grant Administrators are expected to monitor subgrantees by these same standards during the grant term.

Minnesota Housing will conduct at least one monitoring visit of Grant Administrators during the Program grant term, which will include:

- Household file monitoring
- Financial reconciliation

Following the monitoring visit, Minnesota Housing staff will notify the Grant Administrator if follow up is required. An example of this could include obtaining additional documentation to verify household eligibility. Upon timely completion of follow-up items, Minnesota Housing staff will issue a monitoring review summary letter including areas of concern, recommendations and requirements.

##### **Household Files**

At a minimum, Household files should contain the following:

- An application/intake for the Household seeking assistance
- A signed Tennessee warning that lists Minnesota Housing
- A separate Release of Information (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 is being requested
  - Specific information that can be provided and/or requested
  - An expiration date of one year or less
  - A client signature and date

- It is recommended that a staff also sign the ROI
- A separate Release of Information for each adult in the household should be obtained
- Documentation of services provided
- Documentation of eligibility criteria including:
  - The Household is at or below 80% AMI for their location (metro or non-metro county) as set by the most current [U.S. Department of Housing and Urban Development Income Limits](#).
  - The Household is experiencing a financial hardship, which may be demonstrated through a written attestation including qualification for unemployment benefits or other financial hardship.
  - A Household is at risk of housing instability and/or homelessness through a written attestation, which may include risk of eviction, lease termination, or other financial impacts.

#### **4.04 Appeals Policy**

If a Household is denied housing stability services or housing stability services are terminated, the Household may appeal the decision by contacting the Grant Administrator and requesting an appeal of the decision, either in writing or orally, within 15 days of the date of the denial.

After receiving a request for an appeal, the Grant Administrator will assign a staff person to review the materials submitted by the applicant to determine if the applicant is eligible for services. The reviewer must be a different staff member from the one who originally made the eligibility determination. If, on review, the Household is deemed eligible, they will be assisted based on the time and date of the original application submission. If the applicant is again deemed ineligible, a written letter of the appeal decision must be sent to the Household explaining the decision and the reasons for upholding the denial.

The appeal must be completed within five business days of receiving the request for appeal. If an applicant is successful in their appeal, their ability to receive assistance will depend on whether any Housing Stability Services funds are available on the date of the appeal decision.

If the Grant Administrator receives an appeal after the grant term has expired, as outlined in their Grant Contract Agreement, the Grant Administrator shall immediately notify Minnesota Housing of the appeal and forward all relevant information regarding the appeal. Minnesota Housing, in its sole discretion, may transfer the appeal to another Grant Administrator for processing.

## **Chapter 5 – Data and Reporting**

### **5.01 Data Privacy and Security**

To help protect the privacy of the individuals and Households in the Program, Minnesota Housing requires that the Program be implemented in accordance with Treasury Directive: 85-0, which states “All IT (information technology) systems operated on behalf of the Department of the Treasury shall be adequately protected to ensure confidentiality, integrity, and availability in order to minimize the risk of unauthorized access, use, disclosure, disruption, modification, or destruction”. The Treasury IT Security Program (TD P 85-01) has defined controls for providing such protection.

Minnesota Housing and its Grant Administrators use appropriate measures to help ensure the privacy of individuals and Households is protected through secure data storage of personally identifiable information in locations limited to required staff. In addition, additional confidentiality protections for data collected pertaining to any individuals who are survivors of intimate partner violence, sexual assault, or stalking will be further limited and redacted as needed.

### **5.02 Recordkeeping**

Minnesota Housing will collect information from the Grant Administrator to satisfy agency and Treasury requirements. This may include:

- Name and address of Head of Household
- Number of individuals in the household
- Household income
- Gender, race, and ethnicity for Head of Household

Grant Administrator will maintain sufficient documentation of administrative expenses to demonstrate those expenses are within 15% of the total award, which is the maximum allowable under federal Program guidelines.

Grant Administrators and subgrantees are responsible for maintaining financial records that document the use of all Program funds, including supportive services and administrative costs. After grant term completion, Grant Administrators and subgrantees are expected to maintain all records for a minimum of six years after the Grant Contract Agreement has ended. In addition to program financial records, household records must also be maintained for a minimum of six years after the Grant Contract Agreement 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.

### **5.03 Reporting**

The following information outlines the reporting requirements that Minnesota Housing will submit to the federal government as required, as well as standardized public reporting. Minnesota Housing will collect the information listed in section 5.03 for Households that receive services and the expenditures for each service and report to Treasury on a range of data both monthly and quarterly.

Grant Administrators will be provided with a Monthly Expenditure and Outputs Report template that must be submitted ten days after the completion of each reporting period and include subgrantee expenditures and outputs, if using a subgrantee model. Reports will include:

- Expenses by funding category:
  - Housing Stability Services by type, i.e. Eviction Prevention and/or Housing Navigation
  - Program Related Expenses
  - Program Administration Expenses
- Outputs
  - Number of Households served with each type of housing stability service
  - Household Information. Information collected may include:
    - Name and address of each Head of Household
    - Number of individuals in the Household
    - Household income
    - Gender, race, and ethnicity for Head of Household

To help ensure accurate and timely reporting, Grant Administrators should reconcile their expenditures and Households served monthly. Reports for the prior month will be due to Minnesota Housing by the 10<sup>th</sup> of the following month. Grant Administrators also agree to provide such additional reporting as may be deemed necessary by Minnesota Housing. Additional reporting will be at Minnesota Housing's sole discretion.

### **5.04 Compliance with Federal Requirements**

Grant Administrators are responsible for complying with all federal requirements imposed on Program funds through the American Rescue Plan Act. The Grant Administrators must provide any reporting required related to the use of the federal funds and to allow access to its records and financial statements to cooperate with any state or federal audit or review process related to use of the federal funds. Payments to Grant Administrators under this Program are provided as a passthrough in a subrecipient relationship and count toward the threshold of the Single Audit Act and 2 C.F.R. part 200, subpart F audit requirements and Grant Administrators must comply with applicable requirements.

## MINNESOTA HOUSING – CERA HOUSING STABILITY SERVICES PROGRAM GUIDE

Grant Administrators must provide meaningful access to the Program for applicants with Limited English Proficiency. This will likely look different for each Grant Administrator and could include utilizing bilingual staff or a telephonic language line. For more information on what options are available, visit [www.LEP.gov](http://www.LEP.gov) or contact Minnesota Housing at [mhfa.hss@state.mn.us](mailto:mhfa.hss@state.mn.us).

## Chapter 6 – Application Schedule

The anticipated timeline is below:

Date	Activity
Tuesday, January 18, 2022	Request for Proposals (RFP) released
Friday, January 21, 2022	RFP webinar at 2:00 p.m.
Tuesday, February 22, 2022	RFP applications due by 12:00 p.m. (noon) CT
Thursday, April 7, 2022	Award letters issued
Tuesday, April 12, 2022	Due diligence webinar
Friday, May 6, 2022	Due diligence materials due
<b>Wednesday, June 1, 2022</b>	<b>Contracts begin</b>

**NOTE:** The timeline is for illustration purposes only and is subject to change at Minnesota Housing’s sole discretion. If there is a revision to the timeline, Minnesota Housing will send an eNews. Updates will also be posted on [Minnesota Housing’s website](#).

## Chapter 7 – 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 the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988, as well as the Minnesota Human Rights Act. Housing providers 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.

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 terms, conditions or privileges of the rental of a dwelling unit or services or facilities;
- 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;
- 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
- Engage in harassment or quid pro quo negotiations related to the rental of a dwelling unit.

## **Chapter 8 – Fraud, Misuse of Funds, Conflict of Interest, Suspension, and Disclosure and Reporting**

### **8.01 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 ways described in Section 8.05.

### **8.02 Misuse of Funds**

An entity or Household that receives funds through the Program must use those funds for the intended use and have not obtained those funds through any misrepresentation or fraud. A misuse of funds shall be deemed to have occurred if the funds are not used for approved eligible expenses, adequate documentation cannot be provided regarding approved use of eligible expenses, the entity or Household made any misrepresentations in the application or any documentation or engaged in fraud, the entity or Households was not eligible or a duplicate payment was made, or any comparable misuse is deemed to have occurred as determined by Minnesota Housing.

For purposes of any contractor or other entity that enters into a contract or grant agreement with Minnesota Housing related to the Program, the entity agrees to use the funds to engage in certain activities or procure certain goods or services while Minnesota Housing agrees to provide funds to pay for those activities, goods or services subject to the terms of the contract or grant agreement. Regardless of the Minnesota Housing program or funding source, the entity must use Minnesota Housing funds as agreed, and the entity 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 an entity; or (2) a Grant Administrator cannot provide adequate documentation to establish that Minnesota Housing funds were used in accordance with the terms and conditions of the contract or grant agreement.

Anyone that discovers evidence, receives a report from another source, or has other reasonable basis to suspect that a misuse of funds has occurred should immediately make a report through one of the ways described in Section 8.05.

### **8.03 Conflict of Interest**

This section applies only to Grant Administrators or other entities that have entered into agreements with Minnesota Housing related to the Program. Such entities are subject to both federal and state conflict of interest standards.

Federal Conflicts of Interest Standard: Entities subject to this section must disclose in writing to Minnesota Housing any actual or apparent conflict of interest affecting the awarded funds in accordance with 2 C.F.R. §200.112. Such information may also be reported to the U.S. Department of Treasury by Minnesota Housing.

Under the federal standard, no contractor, Field Partner, or other entities that have entered into agreements with Minnesota Housing related to the Program, or their employees, may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Such a conflict of interest would arise when the entity, the employee, or any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial interest in, or a tangible personal benefit from, a firm considered for a contract. Immediate family includes the employee's spouse, partner, children, parents, siblings, and in-laws.

State of Minnesota Conflict of Interest Standard: A conflict of interest, actual, potential, or perceived, 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 potential or perceived 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 the award is or 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, perceived or potential conflicts of interest through one of the ways described in Section 8.05.

#### **8.04 Suspension**

This section applies only to Grant Administrators or other entities that have entered into agreements with Minnesota Housing related to the Program. By entering into any agreement 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 agreement) has not been suspended from doing business with Minnesota Housing. Refer to Minnesota Housing’s website for a list of [suspended individuals and organizations](#).

#### **8.05 Disclosure and Reporting**

Minnesota Housing promotes a “speak-up, see something, say something” culture whereby internal staff, external business partners (e.g., Grant Administrators, borrowers) and the general public are encouraged to report instances of fraud, misuse of funds, conflicts of interest, or other concerns without fear of retaliation. You may report wrongdoing or other concerns by contacting:

- Minnesota Housing’s chief risk officer
- Any member of Minnesota Housing’s [Servant Leadership Team](#)
- [EthicsPoint](#), the Minnesota Housing hotline reporting service vendor

## Appendix A – Terms

Term	Definition
Area Median Income (AMI)	HUD defined incomes that reflect fair market rents for 80% AMI by metro area or non-metro county ( <a href="#">link to HUD definitions</a> )
Emergency Rental Assistance Program (ERA)	A federal program enacted in December 2020 under Title V, Subtitle A, Section 501(a) of the Consolidated Appropriations Act, 2021. ERA was established in response to the COVID-19 pandemic. Entities such as Minnesota Housing and certain counties or cities are direct recipients of allocated funds from this program.
Grant Administrator(s)	Minnesota Housing contracted subrecipients of COVID-19 Emergency Rental Assistance funds for purposes of providing Housing Stability Services.
Household(s)	<p>A Household is made up of all adults and children living in the Household at the time of application or re-application. This may include non-custodial children, unrelated adults, persons not listed on the lease, unborn children, or persons living in the home temporarily.</p> <p>Unrelated adults living together under one lease or rent agreement are considered a Household. Unrelated adults renting a room or otherwise under an arrangement to rent part of a home separately and who can demonstrate that would be considered a separate Household.</p> <p>Also referred to as renter Households.</p>
Minnesota Housing Finance Agency	The state’s housing finance agency; also referred to as Minnesota Housing
Program	Housing Stability Services Program
Treasury	The U.S. Department of the Treasury