

**St. Clair County Illinois
Intergovernmental Grants Department**

**HOME Investment Partnerships
American Rescue Plan Program
(HOME-ARP)**

Policies and Procedures Manual



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KEY TERMS AND DEFINITIONS

Affordable Rental Housing

Rental housing projects assisted with HOME-ARP funds that must comply with property standards in 24 CFR 92.251, HOME-ARP rent requirements, and affordability periods of at least fifteen years. At least 70 percent of HOME-ARP-assisted units across the PJ's HOME-ARP portfolio must be occupied by Qualifying Populations.

Affordability Period

The required period—no less than fifteen years—during which HOME-ARP rental units must continue to meet all rent, property standard, and occupancy requirements after project completion.

Choice-Limiting Actions

Actions prohibited prior to completion of an environmental review under 24 CFR Part 58, including acquisition, demolition, rehabilitation, construction, or commitment of funds. These restrictions apply equally to the PJ and project owners.

Coordinated Entry (CE)

A standardized assessment and referral system operated by the local Continuum of Care. Under HOME-ARP, CE may screen for Qualifying Population eligibility and apply PJ-adopted preferences. Providers must follow the County's separate CE policy for confidentiality, routing, and data protection.

Duplication of Benefits (DOB)

A prohibition under CPD-21-10 against providing HOME-ARP financial assistance for a cost already paid or available from another source. PJs must ensure that no HOME-ARP assistance exceeds the amount needed.

Environmental Review Record (ERR)

The complete documentation of compliance with 24 CFR Part 58, including consultations, findings, public notices, and the Request for Release of Funds (RROF) and Authority to Use Grant Funds (AUGF), when applicable. ERRs must be retained in accordance with 24 CFR 92.508.

HMIS (Homeless Management Information System)

The data system used to collect and manage information for homeless assistance services. HMIS standards apply to HOME-ARP except when prohibited by VAWA confidentiality rules. Survivor-identifying information may not be entered unless permitted by federal confidentiality requirements and local CoC DV protocols.

HOME-ARP (HOME – American Rescue Plan Program)

A HUD program established by the American Rescue Plan Act of 2021 to provide homelessness assistance and supportive services through the HOME Program structure. HOME-ARP requirements are established in Notice CPD-21-10 and modified by CPD-22-13.

IDIS (Integrated Disbursement and Information System)

HUD’s system of record used to set up, fund, draw, and complete HOME-ARP activities. IDIS data must reflect accurate beneficiary, cost, and performance information per CPD-21-10 and 24 CFR 92.502.

Internal Controls

Administrative and financial procedures required under 2 CFR 200.303, including segregation of duties, oversight systems, reconciliation processes, cybersecurity protections, and monitoring to ensure compliance with federal statutes, regulations, and the terms of the award.

Operating Cost Assistance Reserve (OCAR)

A HOME-ARP reserve that may be established for rental housing restricted to Qualifying Populations. OCAR must be sized and monitored according to CPD-21-10 requirements.

Personally Identifiable Information (PII)

Information that can be used to identify a particular individual, including names, addresses, dates of birth, contact information, and case record details. PII must be protected according to 2 CFR 200.303(e), which requires reasonable cybersecurity and access-control measures.

Program Income (PI)

Gross income received by the PJ that is directly generated by the use of HOME-ARP funds. PI must be recorded and used in accordance with 24 CFR 92.503, including expenditure prior to drawing new grant funds.

Qualifying Populations (QPs)

The four categories of individuals and families eligible to receive HOME-ARP assistance under CPD-21-10. These include: persons who are homeless (QP1); persons at risk of homelessness (QP2); persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (QP3); and other populations defined by HUD as having the greatest risk of housing instability (QP4).

Recordkeeping

The required retention of financial, programmatic, environmental, and beneficiary records under 24 CFR 92.508. Rental housing records must be kept for the affordability period plus five years; all other HOME-ARP records must be kept for at least five years after project closeout.

Restricted-Access Files

Confidential files containing sensitive PII, including all QP3 documentation. These files must be stored separately and may only be accessed by staff with a legitimate need to know, consistent with CPD-21-10 confidentiality standards.

Supportive Services

Services eligible under HOME-ARP, including McKinney-Vento supportive services, housing search and stabilization, legal services, behavioral health services, case management, transportation, child care, basic needs supports, and limited financial assistance such as utility arrears or security deposits, as defined in CPD-21-10.

VAWA Protections (Violence Against Women Act)

Federal confidentiality and housing protections under 24 CFR 5.2005 and 24 CFR 92.359 that apply to HOME-ARP rental housing and any future TBRA. VAWA prohibits disclosure of survivor-identifying information without informed, written, time-limited consent and requires emergency transfer, notice, and lease bifurcation protections.

Written Agreement

A legally binding contract executed under 24 CFR 92.504 that sets forth eligible uses, performance requirements, reporting, recordkeeping, VAWA protections, financial controls, and compliance obligations for all HOME-ARP funding recipients.

MANUAL PURPOSE

The purpose of this Policies and Procedures Manual is to establish clear administrative guidance for the use, management, and oversight of St. Clair County's HOME-ARP funds. This Manual provides uniform standards for program administration, financial management, eligibility determination, documentation, recordkeeping, monitoring, and compliance for all [HOME-ARP](#) activities.

These policies ensure compliance with the [American Rescue Plan Act](#), [HUD Notice CPD-21-10](#), as amended, applicable provisions of [24 CFR Part 92](#), and all cross-cutting federal requirements.

This Manual is intended for use by IGD/CD staff, subrecipients, developers, contracted providers, and partners participating in the delivery of HOME-ARP activities. It serves as the County's governing administrative framework for implementing the HOME-ARP Allocation Plan and ensuring that funds are used efficiently, effectively, and in accordance with HUD requirements.

SECTION 1: PROGRAM OVERVIEW

Purpose of the HOME-ARP Program

The [HOME-American Rescue Plan \(HOME-ARP\)](#) Program was established under the [American Rescue Plan Act of 2021](#) to provide states and local governments with resources to reduce homelessness, increase housing stability, and expand access to supportive services for vulnerable populations impacted by the COVID-19 pandemic and its long-term effects. HOME-ARP funds support the development of affordable housing, tenant-based rental assistance, supportive services, and non-congregate shelter for eligible qualifying populations, consistent with [HUD Notice CPD-21-10](#). These funds must be used in accordance with HUD's HOME-ARP implementing requirements to serve individuals and families meeting one or more eligible qualifying population definitions.

- *St. Clair County's HOME-ARP Allocation Plan allocates its \$3,762,217 award to Supportive Services and Affordable Rental Housing Development.*
- *In accordance with HUD's HOME-ARP commitment and expenditure requirements, all HOME-ARP funds must be fully expended no later than September 30, 2030, or they are subject to reduction or recapture by HUD.*

Legislative and Regulatory Background

HOME-ARP funds were authorized under the [American Rescue Plan Act of 2021 \(Public Law 117-2\)](#), enacted on March 11, 2021. The Act appropriated \$5 billion nationally to provide homelessness assistance and supportive services through the [HOME Investment Partnerships Program](#) structure. Key statutory and programmatic provisions include:

- Allocation of funds to jurisdictions that received a HOME allocation in FY 2021
- Use of funds to address homelessness, housing instability, and supportive service needs among vulnerable populations
- Authorization for HUD to issue waivers and alternative requirements to expedite program implementation
- Eligibility for activities such as rental housing development, supportive services, non-congregate shelter, and tenant-based rental assistance
- Emphasis on serving individuals and families experiencing homelessness or facing the greatest risk of housing instability.

HUD issued [Notice CPD-21-10: Requirements for the Use of Funds in the HOME-ARP Program](#) on September 13, 2021. This Notice established the primary regulatory framework for HOME-ARP, including eligible uses, qualifying populations, program administration standards, and cross-cutting federal requirements. HUD later issued [Notice CPD-22-13](#) on October 31, 2022, amending the original implementing Notice by revising allocation plan requirements and setting the final submission deadline for all HOME-ARP Allocation Plans. HOME-ARP funds remain subject to the HOME Program regulations at [24 CFR Part 92](#), except where HUD has applied explicit waivers or alternative requirements contained in [Notice CPD-21-10](#).

[The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 \(URA\)](#) and its implementing regulations at [49 CFR Part 24](#) apply to HOME-ARP projects involving acquisition, demolition, conversion, or displacement unless waived. URA requirements include:

- Just compensation for real property acquisition under [49 CFR Part 24, Subpart B](#)
- Requirements for voluntary acquisitions under [49 CFR 24.101](#)
- Permanent displacement benefits, advisory services, and moving expense payments
- Temporary relocation requirements under [49 CFR Part 24, Appendix A, § 24.2\(a\)\(9\)\(ii\)\(D\)](#)

HOME-ARP funds are subject to [Section 104\(d\) of the Housing and Community Development Act](#) and its implementing regulations at [24 CFR Part 42, Subpart C](#), unless waived. Section 104(d) applies to activities involving the demolition or conversion of lower-income dwelling units. Requirements include:

- Maintenance of a Residential Anti-Displacement and Relocation Assistance Plan (RARAP) under [24 CFR 42.325](#).
- Provision of relocation assistance to displaced lower-income persons under [24 CFR 42.350](#).
- One-for-one replacement of demolished or converted units under [24 CFR 42.375](#).

SECTION 2: ADMINISTRATIVE ROLES & RESPONSIBILITIES

This section outlines the administrative framework and responsibilities of St. Clair County, as the Participating Jurisdiction (PJ), and any subrecipients the County may engage to assist in carrying out HOME-ARP activities. Clear delegation of duties and adherence to established administrative procedures are essential to ensuring compliance with the [American Rescue Plan Act](#), HUD Notice [CPD-21-10](#), [CPD-22-13](#), applicable provisions of [24 CFR Part 92](#), [2 CFR Part 200 \(Uniform Guidance\)](#), and all cross-cutting federal requirements governing the HOME-ARP Program.

Participating Jurisdiction Responsibilities

As the Participating Jurisdiction, St. Clair County is responsible for the full administration, oversight, and compliance of the HOME-ARP program. In accordance with HUD Notices, the PJ must manage day-to-day operations, ensure HOME-ARP funds are used in accordance with federal requirements, maintain internal controls, and enforce written agreement requirements. The PJ's responsibilities include:

1) Program Administration

- Develop, implement, and update the HOME-ARP Policies & Procedures Manual.
- Ensure all activities comply with [Notice CPD-21-10](#), its Appendix (waivers and alternative requirements), and applicable HOME regulations at [24 CFR Part 92](#), unless waived.
- Administer the program consistent with the County's approved [HOME-ARP Allocation Plan](#).
- Establish written processes for eligibility, documentation, internal controls, financial management, and monitoring.

2) Financial and Grant Management

- Maintain internal controls consistent with [2 CFR 200.303](#).
- Set up, fund, draw down, and close out activities in HUD's Integrated Disbursement and Information System (IDIS).
- Maintain accurate financial documentation, invoices, drawdown support, and audit records.

- Oversee commitments, expenditures, and timeliness to ensure compliance with HOME-ARP expenditure deadlines
- 3) Oversight of Subrecipient (if applicable)
- Execute written agreements that contain all HUD-required provisions and HOME-ARP alternative requirements.
 - Conduct ongoing communication, technical assistance, and capacity support for partners.
 - Perform risk assessments and monitoring, including desk reviews and onsite monitoring, consistent with HOME program rules.
 - Issue findings, concerns, and corrective actions and track their resolution.
- Note. As of the HOME-ARP Allocation Plan, St. Clair County has not identified any subrecipients. This Manual includes requirements for subrecipients only in case the County procures one in the future.*
- 4) Reporting and Accountability
- Report accomplishments, beneficiary data, expenditures, and progress in IDIS.
 - Ensure compliance with all applicable cross-cutting federal requirements
 - Maintain records in accordance with [CPD-21-10](#), [24 CFR 92.508](#), and [2 CFR 200.334](#)

Subrecipient Responsibilities (If Applicable)

St. Clair County may carry out HOME-ARP Supportive Services directly or may procure one or more subrecipients for program implementation. If subrecipients are used, they must follow all requirements in their written agreement, this Policies and Procedures Manual, and Notice [CPD-21-10](#) and applicable federal regulations

- 1) Program Implementation
- Deliver approved services according to the written scope of work.
 - Verify and document that all participants meet HOME-ARP Qualifying Population requirements.
 - Maintain confidential client files and source documents in accordance with HUD’s required order of documentation.
- 2) Financial Management
- Maintain internal controls per [2 CFR 200.303](#).
 - Track all program expenditures and provide documentation for reimbursement.
 - Follow applicable procurement requirements under 2 CFR 200.318–327.
- 3) Compliance & Reporting
- Adhere to all federal cross-cutting requirements.
 - Prevent Duplication of Benefits (DOB) where applicable.
 - Submit timely performance and financial reports.
 - Cooperate fully with monitoring activities.

Internal Controls & Segregation of Duties

St. Clair County and any subrecipients must maintain effective internal controls consistent with [2 CFR 200.303](#). Internal controls must ensure:

- Safeguarding of funds
- Accurate financial management

- Proper eligibility verification
- Prevention of waste, fraud, and abuse
- Protection of sensitive client information
- Clear separation of duties

Examples of required separation include:

- Program staff determine eligibility
- Supervisors review documentation
- Fiscal staff process payments
- Management approves drawdowns

No single staff member may control all key aspects of a transaction. Internal controls must align with 2 CFR 200.303 and be documented in organizational policies

Conflict of Interest Requirements

All real or potential conflicts of interest must be avoided or disclosed. Conflict of interest requirements apply to all HOME-ARP activities under:

- 24 CFR 92.356 (HOME conflict of interest)
- 2 CFR 200.318(c)(1) (procurement conflict of interest)

Requirements include:

- No employee, agent, consultant, officer, or official may participate in a decision where they have a financial or personal interest.
- Written disclosure of any potential conflicts.
- The PJ will maintain a Conflict-of-Interest Log.
- HUD exception requests must be submitted when required.

SECTION 3: CROSS-CUTTING FEDERAL REQUIREMENTS

The following federal requirements apply to all HOME-ARP activities administered by St. Clair County. Some requirements apply universally, while others apply only when specific project types, funding levels, or activities trigger compliance obligations.

The table below summarizes which cross-cutting federal requirements generally apply to each HOME-ARP activity type.

Cross-Cutting Requirement	Supportive Services	TBRA	Rental Housing	Non-Congregate Shelter (NCS)	Nonprofit Operating / Capacity
Non-Discrimination (Civil Rights, Title VI, Section 109, etc.)	✓	✓	✓	✓	✓
Fair Housing Act Requirements	✓	✓	✓	✓	✓

	(if serving households)			(if admission policies apply)	
Section 504 / ADA (Program & Facility Accessibility)	✓ (program access)	✓ (program access)	✓ (program + facility)	✓ (facility + program)	✓
Affirmative Marketing	✓ (if housing outcomes involved)	✓	✓	✓ (if units are designated for specific populations)	✗
Section 3 (24 CFR Part 75)	✗	✗	May Apply (if construction)	May Apply (if construction/rehab)	✗
URA / Anti-Displacement (49 CFR Part 24)	✗	✗	May Apply (acquisition/rehab triggers)	✓ (NCS development often triggers)	✗
Section 104(d)	✗	✗	Applies to demolition/ conversion of low-income units	Applies if existing housing is converted or demolished	✗
Davis-Bacon / Labor Standards	✗	✗	✓ (12 or more HOME assisted units)	✓ (12 or more HOME assisted units)	✗
LEP Requirements	✓	✓	✓	✓	✓
Environmental Review (24 CFR Part 58)	✗	✓	✓	✓	✓

Non-Discrimination Requirements

St. Clair County shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source.

The County maintains internal policies that guide implementation and ensure compliance with federal requirements. Recipients/Subrecipients must adhere to these policies. Policies are available through the Intergovernmental Grants Department.

Fair Housing Requirements

St. Clair County administers all HOME-ARP activities in accordance with the Fair Housing Act (42 USC 3601) and applicable HUD regulations. The County maintains adopted Fair Housing Policies and Procedures, which outlines the standards and internal processes for ensuring compliance.

All staff and Recipients/Subrecipients must follow the County's Fair Housing Manual, including requirements related to:

- Nondiscriminatory program administration
- Consistent eligibility and screening practices
- Reasonable accommodations
- Posting HUD's Equal Housing Opportunity information
- Documentation and complaint procedures

This Manual incorporates the Fair Housing Policies and Procedures Manual by reference. The Fair Housing Manual is maintained by the Intergovernmental Grants Department and available upon request.

Section 504 and ADA Requirements

St. Clair County maintains a standalone Section 504 / ADA Policy, which governs accessibility, reasonable accommodations, facility standards, and program access. All Recipients/Subrecipients must comply with Section 504, ADA Titles I and II, and 24 CFR Part 8.

Accessibility requirements for construction-related activities under HOME-ARP are established in the County's standalone Section 504 / ADA Policy and the County's ADA Resolution, which are located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development. These documents contain the governing accessibility standards that Recipients/Subrecipients must follow.

Affirmative Marketing Requirements

St. Clair County maintains an adopted Affirmative Marketing Policy applicable to HOME- and CDBG-funded housing programs. The purpose of affirmative marketing is to ensure broad, inclusive, and nondiscriminatory outreach to potential program beneficiaries, including households that may be less likely to apply.

Recipients/Subrecipients and project owners must follow the County's Affirmative Marketing Policy, which establishes requirements for:

- Nondiscriminatory outreach and advertising
- Use of HUD's Equal Housing Opportunity logo or statement
- Public notices, media outreach, and distribution of program information
- Project-specific marketing strategies, where required
- Record-keeping and documentation of outreach efforts

This Manual incorporates the Affirmative Marketing Policy by reference. The policy is maintained by the Intergovernmental Grants Department.

Section 3 / Minority Business Enterprise (MBE) Requirements

If applicable, compliance with Section 3 of the Housing and Urban Development Act of 1968 is required whenever HOME-ARP funds support housing construction or rehabilitation over applicable thresholds. When Section 3 is triggered, to the greatest extent feasible, provide employment, training, and contracting opportunities to Section 3 residents and Section 3 businesses located in the project area. Section 3 generally does **not** apply to Supportive Services or administrative activities. Section 3 applies only to construction activities where labor hours are generated, and does not apply to Supportive Services or administrative activities.

St. Clair County IGD/CD maintains an overall Minority Business Enterprise (MBE) participation goal of fifteen percent (15%) for HUD-funded construction activities. Contractors and Recipients/Subrecipients are required to take affirmative steps to solicit minority- and women-owned business enterprises for all procurement and contracting opportunities related to HOME-ARP construction or rehabilitation.

IGD/CD monitors Section 3 and MBE compliance through review of documentation, labor hour reporting (when applicable), procurement records, and contractor outreach efforts. Contractors and Recipients/Subrecipients must maintain records demonstrating their efforts to meet Section 3 expectations and MBE utilization goals.

Davis-Bacon Compliance

In accordance with the Davis-Bacon and Related Acts Davis-Bacon and Related Acts (DBRA), every HOME-ARP funded construction and rehabilitation for 12 or more HOME assisted units or other eligible construction activities must include provisions requiring the payment of prevailing wages established by the U.S. Department of Labor.

DBRA does not apply to Supportive Services or TBRA. They apply only when HOME-ARP funds are used for construction and rehabilitation-related costs.

1) Prevailing Wage Determinations

All HOME-ARP funded construction and rehabilitation contracts must include the applicable DOL wage determinations, ensuring that all laborers and mechanics are paid no less than the prevailing wages for their job classification and geographic area.

2) Applicability Across Projects

- Davis-Bacon applies to any eligible HOME-ARP construction and rehabilitation contract over \$2,000, regardless of the number of units or project size.
- Contractors and Recipients/Subrecipients may not split contracts or structure work in a manner that avoids Davis-Bacon applicability.
- Once triggered, prevailing wage requirements apply to all laborers and mechanics working on the project.

3) On-Site Compliance & Enforcement

Contractors and Recipients/Subrecipients must ensure full compliance with DBRA requirements, including:

- Conducting on-site inspections and worker interviews
- Collecting and reviewing certified weekly payroll reports
- Correcting any labor standards violations promptly
- Maintaining complete documentation of labor standards enforcement
- Certifying compliance prior to processing contractor payments

St. Clair County IGD/CD is responsible for monitoring contractor compliance with Davis-Bacon labor standards and verifying that all required wage, payroll, and enforcement documentation is maintained in the project file.

Uniform Relocation Assistance (URA)

URA requirements [49 CFR Part 24](#) applies to HOME-ARP projects involving acquisition, demolition, conversion, or displacement unless waived. Supportive Services do not trigger URA unless linked to a separate acquisition, demolition, or rehabilitation activity. NCS development frequently triggers URA. Section 104(d) ([24 CFR Part 42](#)) applies when HOME-ARP-assisted activities involve demolition or conversion of lower-income residential units, requiring a Residential Anti-Displacement and Relocation Assistance Plan, one-for-one replacement, and relocation assistance to lower-income persons. Partners must notify the County before any action that could trigger URA/104(d) so that required notices and compliance steps are implemented.

For the full policy and required procedures, refer to the County website: Residential Anti-Displacement & Relocation Assistance Policy located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

Violence Against Women Act (VAWA)

HOME-ARP Rental Housing (and any future TBRA) must comply with [VAWA](#) protections at [24 CFR part 5, subpart L](#) and [24 CFR 92.359](#), including notice/certification, emergency transfer, lease bifurcation, confidentiality, and the prohibition on denial or termination of assistance based on victim status. Supportive Services must safeguard survivor confidentiality and safety consistent with VAWA principles and County practices. All providers will implement documentation practices that respect survivor self-certification where permitted.

This Manual incorporates the Violence Against Women Act (VAWA) by reference. The policy is maintained by the Intergovernmental Grants Department.

SECTION 4: QUALIFYING POPULATIONS (QPS)

HOME-ARP funds must primarily benefit individuals and families who meet **one or more** of the following four [Qualifying Populations](#) as defined in [Notice CPD-21-10](#):

- **QP1 — Homeless**
Individuals or families who meet the definition of “Homeless” at [24 CFR 91.5](#), including those living in places not meant for habitation, emergency shelters, or exiting institutions after a short stay.
- **QP2 — At Risk of Homelessness**
Individuals or families who meet the definition of “At Risk of Homelessness” at [24 CFR 91.5](#), including those with unstable housing, extremely low income, or limited support networks.

- **QP3 — Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**
This includes survivors of DV, sexual assault, stalking, or trafficking as defined under applicable HUD and federal statutes.
- **QP4 — Other Populations**
Defined in Notice [CPD-21-10](#) as:
 - Other families requiring services or housing assistance to prevent homelessness, or
 - Those at greatest risk of housing instability (including those below 30% AMI with severe cost burden).

Note. Individuals and families who meet any QP definition are eligible for St. Clair County’s HOME-ARP Supportive Services program.

Documentation Requirements

All Qualifying Populations must be documented in accordance with HUD’s required evidence hierarchy in [Notice CPD-21-10](#), which permits third-party documentation when available and allows self-certification when third-party verification cannot reasonably be obtained.

Targeting Requirements

HUD requires specific targeting thresholds under HOME-ARP:

- **Supportive Services**
100% of individuals or households served must meet at least one Qualifying Population definition. Since St. Clair County has allocated HOME-ARP funds to Supportive Services, all beneficiaries must meet a QP definition at intake.
- **No Income Requirement for Eligibility**
Initial eligibility does not require an income determination unless the activity or service itself relies on an income-based standard (e.g., a rental assistance component).
Note: For Supportive Services, income does not affect eligibility. Income eligibility must still be determined for HOME-ARP Rental Housing and TBRA in accordance with [24 CFR 5.609](#), if those activities are funded in the future
- **Compliance with Allocation Plan Priorities**
St. Clair County’s Allocation Plan does not establish separate prioritization tiers among QPs. The County will serve all QPs who meet eligibility criteria based on needs identified through the Coordinated Entry and service provider network.

Preferences

St. Clair County has formally adopted preferences for its HOME-ARP program, consistent with the needs assessment, gap analysis, and consultation documented in the County’s [HOME-ARP Allocation Plan](#). Preferences are implemented through the County’s Coordinated Entry (CE) system in compliance with HUD Notice [CPD-21-10](#), HUD civil rights requirements under [24 CFR 5.105\(a\)](#), and the definitions of Qualifying Populations established in [CPD-21-10](#).

County-Adopted HOME-ARP Preferences

St. Clair County has established the following preferences:

- **QP1 — Homeless**
- **QP3 — Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

These preferences directly address unmet needs identified in the County’s Allocation Plan:

- Severe shortages of services for individuals and families experiencing literal homelessness
- Immediate safety and housing stability needs of survivors of domestic violence and trafficking

Prioritizing QP1 and QP3 ensures HOME-ARP resources target the households experiencing the highest vulnerability, greatest risk of harm, and highest identified need. Preferences do not exclude QP2 or QP4 from receiving services. All QPs remain eligible, but households meeting QP1 or QP3 are IGD’s preference. These preferences apply to all HOME-ARP Supportive Services and any future HOME-ARP funded activities.

SECTION 5: REFERRAL METHODS

St. Clair County will use the [HOME-ARP Expanded Coordinated Entry](#) referral method established by the local Continuum of Care (CoC). The CE system serves as the centralized access point for all four Qualifying Populations and ensures that referrals to HOME-ARP services are made in a fair, consistent, and nondiscriminatory manner in accordance with HUD civil rights requirements and all applicable nondiscrimination laws.

Under this policy, Coordinated Entry will:

- Integrate HOME-ARP eligibility screening (QP1–QP4) into the CE assessment process.
- Apply the County’s adopted preferences by prioritizing QP1 (Homeless) and QP3 (Fleeing DV/SA/Stalking/Trafficking) for the first available HOME-ARP service opportunities.
- Ensure that all Qualifying Populations (QP1–QP4) remain eligible for referral to HOME-ARP services, with prioritization decisions informed by Coordinated Entry assessment results, vulnerability, and system-wide need
- Maintain survivor-specific confidentiality and routing requirements for QP3 households consistent with HUD and VAWA protections. Domestic violence, sexual assault, stalking, or trafficking survivors may be referred through a confidential parallel CE process consistent with HUD CE guidance and VAWA confidentiality requirements.
- Geographic Coverage of Coordinated Entry. St. Clair County’s HOME-ARP activities and the local Continuum of Care’s Coordinated Entry (CE) system serve the same geographic area. If any HOME-ARP project or activity is implemented in a geographic area broader than that covered by CE, the County will establish written procedures to ensure equitable access, uniform referral processes, and compliance with HUD Notice [CPD-21-10](#).

Note. If St. Clair County funds HOME-ARP Rental Housing or TBRA in the future, the County will determine whether CE referrals will be required for those activities based on HUD guidance and the written agreement.

The CE system may not impose additional eligibility criteria beyond the HUD-defined Qualifying Populations and the County’s adopted preferences. All operational procedures for implementing HOME-ARP Expanded CE referrals are governed by the St. Clair County Coordinated Entry Policies & Procedures, which are located on the county’s public website at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

SECTION 6: ELIGIBLE ACTIVITIES

Under HUD [Notice CPD-21-10](#), St. Clair County may use HOME-ARP funds for six eligible activities. The [County’s HOME-ARP Allocation Plan](#) identifies Affordable Rental Housing Development and Supportive Services as the two primary activity categories to be funded, based on consultation findings, the Needs Assessment, and Gaps Analysis.

1) Administration & Planning

St. Clair County may use up to 15% of its HOME ARP allocation for eligible administrative and planning activities, consistent with [CPD 21-10](#). Eligible activities include:

- General management, oversight, and coordination
- Preparation/amendment of the Allocation Plan
- Monitoring and compliance activities
- Environmental review responsibilities ([24 CFR Part 58](#))
- Reporting (IDIS) and federal systems management
- Staff salaries and related costs for administration

Note. Per the Allocation Plan, St. Clair County IGD will administer only the administrative portion of HOME-ARP directly. If funded, all activities will be carried out by selected developers and service providers.

2) Supportive Services (One of the two activities selected for funding)

Supportive Services may be funded to address gaps identified in the County’s Needs Assessment and stakeholder consultations, including programs that enhance prevention, diversion, stabilization, or wrap-around support.

Eligible services include McKinney-Vento supportive services, homelessness prevention services, and housing counseling services consistent with Notice [CPD-21-10](#). These include:

- Housing search and stabilization
- Case management
- Navigation, outreach, and engagement
- Legal services (e.g., protective orders, VAWA-related needs)
- Transportation
- Employment, education, and life-skills support
- Mental health and behavioral health services
- Child care, food, and basic needs assistance
- Financial assistance such as application fees, utility deposits, security deposits, and rental arrears (for stabilization)

Selection of Service Providers

St. Clair County will identify and solicit specific Supportive Services projects through a formal public solicitation process. The solicitation will:

- Specify the types of Supportive Services eligible under HOME-ARP
- Clearly identify unmet needs and service gaps
- Invite agency submissions that respond to the County's service priorities
- Be publicly posted via the IGD website and County communication channels
IGD will publicly announce awarded service projects and enter into written agreements with selected providers.

3) Affordable Rental Housing Development *(One of the two funded activities identified in your Allocation Plan)*

The County's Allocation Plan identifies Affordable Rental Housing Development as a major funding priority due to the significant need for long-term housing solutions identified through consultation and the Gaps Analysis.

• Eligible Projects

Projects may include acquisition, rehabilitation, or new construction of rental housing units restricted for HOME-ARP eligible households. Key requirements include:

- At least 70% of HOME-ARP assisted units must be restricted for Qualifying Populations (QPs).
- Up to 30% may be restricted to low-income households ($\leq 80\%$ AMI).
- Units must meet HOME-ARP rent requirements and property standards.
- A minimum 15-year compliance and affordability period is required.

• Operating Cost Assistance (if applicable)

Projects may include a HOME-ARP Operating Cost Assistance Reserve (OCAR) for QP-restricted units, consistent with [CPD-21-10](#) requirements.

• Developer Selection Process

IGD will issue a Request for Proposals (RFP) for Affordable Rental Housing Development. The process will include:

- A 30-day application period
- Availability of IGD staff for applicant questions
- Clear inclusion of all County-specific requirements
- Public announcement of awarded projects

4) Tenant-Based Rental Assistance (TBRA)

If St. Clair County allocates HOME-ARP funds to TBRA in the future, the following policies apply:

- Assistance may be provided to any household meeting a Qualifying Population definition.
- Subsidies may include rent, security deposits, and utility deposits.
- Rent reasonableness and HQS/NSPIRE inspections are required.
- The PJ must establish maximum subsidy standards and payment policies.

5) Non-Congregate Shelter (NCS)

If NCS is funded in the future:

- HOME-ARP funds may be used for acquisition, rehabilitation, or construction of NCS units.
- Units must provide private rooms and private bathrooms and serve only Qualifying Populations.
- HOME-ARP may not pay ongoing operating costs.
- NCS projects carry a 10–15 year restricted-use period depending on development type.

6) Nonprofit Operating & Capacity Building Assistance

HOME-ARP allows assistance to nonprofits for:

- Operating costs (staff, overhead)
- Capacity building (training, strategic planning, system improvements)
- Eligible nonprofits must serve HOME-ARP QPs.

SECTION 7: SUPPORTIVE SERVICES REQUIREMENTS

This section establishes the requirements, eligibility standards, allowable costs, documentation, service delivery expectations, and performance requirements for Supportive Services carried out under St. Clair County’s HOME-ARP program. These requirements implement HUD Notice [CPD-21-10](#) and applicable provisions of [24 CFR Part 92](#).

Supportive Services are one of the two primary activities funded under the County’s HOME-ARP Allocation Plan and must address the needs identified in the County’s Needs Assessment and stakeholder consultations.

Purpose

Supportive Services under HOME-ARP are designed to:

- Assist Qualifying Populations (QPs) in obtaining and maintaining housing stability
- Provide homeless prevention and diversion activities
- Address safety needs for QP3 households fleeing domestic violence, sexual assault, stalking, or trafficking
- Fill service gaps identified in the County’s allocation plan and consultation process
- Reduce returns to homelessness and promote long-term stability

All services must be consistent with the eligible Supportive Services categories permitted under [CPD-21-10](#) (e.g., McKinney-Vento supportive services, homelessness prevention, housing counseling, and stabilization services).

Eligible Participants

All clients served with HOME-ARP Supportive Services must meet at least one Qualifying Population (QP) definition:

- QP1 — Homeless
- QP2 — At Risk of Homelessness
- QP3 — Fleeing/Attempting to Flee DV/SA/Stalking/Trafficking
- QP4 — Other Populations (as defined under CPD-21-10)

Income determination is not required for Supportive Services eligibility unless the service category itself requires income verification (e.g., some financial assistance).

County-adopted preferences apply to all Supportive Services:

- QP1 — Homeless
- QP3 — Fleeing or Attempting to Flee DV/SA/Stalking/Trafficking

Providers must apply these preferences through the HOME-ARP Expanded CE Referral posture described in this manual.

All Qualifying Populations must be documented according to HUD’s required evidence hierarchy under Notice [CPD-21-10](#), which allows self-certification when third-party documentation cannot reasonably be obtained.

Eligible Supportive Services and Costs

Supportive Service Category	Eligible Costs	Required Documentation
Housing Search, Navigation & Stabilization	<ul style="list-style-type: none"> • Outreach & engagement • Housing search & landlord coordination • Application/document readiness • Housing stability planning 	<ul style="list-style-type: none"> • QP eligibility verification (QP1–QP4) • CE referral documentation • Service logs/case notes • Records of landlord contacts & housing placement activities
Case Management & Client Support	<ul style="list-style-type: none"> • Intake & assessment • Individualized service planning • Crisis intervention • Ongoing case management & follow-up 	<ul style="list-style-type: none"> • Case management notes • Service plan • Contact logs • Documentation of referrals and follow-up
Mental Health, Behavioral Health, Substance Use Supports	<ul style="list-style-type: none"> • Non-clinical counseling • Support groups • Behavioral health services tied to housing stability 	<ul style="list-style-type: none"> • Attendance logs • Case notes documenting service need • Referral documentation to licensed providers
Legal Services (Housing or Safety Related)	<ul style="list-style-type: none"> • Eviction prevention assistance • Landlord mediation • Safety-related legal advocacy • Protective order assistance 	<ul style="list-style-type: none"> • Documentation describing the housing/safety nexus • Case notes • Copies of filings (if safe to retain) • QP3 confidentiality protections applied
Financial Assistance for Housing Stability	<ul style="list-style-type: none"> • Application fees • Security deposits • Utility deposits or arrears • Short-term stabilization assistance as allowed 	<ul style="list-style-type: none"> • Proof of cost (invoice, bill, statement) • Proof of payment • DOB (Duplication of Benefits)

		check • Written justification tying assistance to housing stability
Transportation Assistance	• Bus passes • Gas cards (restricted-use) • Ride-share/taxi for housing-related appointments	• Receipts/invoices • Documentation of housing-related purpose • Log of disbursements
Childcare, Education, Employment & Life Skills	• Childcare for housing-related activities • Job readiness, budgeting, life-skills classes • Education or training tied to stability	• Attendance logs • Case notes describing relevance to stability • Curriculum or description of service
Basic Needs & Emergency Supports	• Food assistance • Hygiene & household items • Clothing needed for housing/employment • Emergency supplies for safety (e.g., locks, phones for QP3)	• Case notes explaining need • Receipts and distribution logs • Confidentiality protections for QP3 items
Coordination with CE, DV Providers, or Other Systems	• Staff participation in CE case conferencing • Coordination with DV/trafficking providers • Collaboration with housing, health, or behavioral health partners	• Documentation of CE participation • Partnership agreements (if applicable) • Case notes describing coordinated activities
Direct Service Delivery (Non-Admin)	• Staff costs directly tied to delivery of eligible services • Supplies necessary for service delivery (non-capital)	• Timesheets & payroll allocation • Job descriptions • Cost allocation plan (if applicable)

Ineligible Costs

The following costs are **not** eligible under HOME-ARP Supportive Services:

- General charitable assistance not tied to housing stability
- Long-term rental subsidies or ongoing rent payments (beyond allowable arrears)
- Medical services not directly tied to housing
- Employment wages for participants
- Cash payments made directly to participants
- Activities outside the eligible categories established by CPD-21-10
- Mortgage assistance / homeownership cost

Service Delivery Requirements

All Supportive Services providers must:

- Follow trauma-informed, housing-focused service practices
- Prioritize QP1 and QP3 clients as required under County preferences
- Follow County confidentiality protocols, including enhanced protections for QP3
- Document services accurately using standardized logs or case management systems
- Coordinate services through the local Continuum of Care (CoC) and CE system
- Utilize safety planning and confidential record-keeping for survivor households
- Avoid duplication of benefits (DOB) when providing financial assistance

Providers must ensure that services are delivered consistently with the written agreement, scope of work, and HUD-defined eligible activities.

Performance and Reporting Requirements

Supportive Services providers must submit:

- Monthly or quarterly program performance reports
- Financial expenditure reports with documentation
- Outputs and outcomes tied to contracted performance metrics
- Data needed for HUD reporting, including QP data and service categories

IGD/CD may require corrective action for incomplete reporting, late submissions, or data quality issues.

SECTION 8: AFFORDABLE RENTAL HOUSING REQUIREMENTS

Property Standards

(HOME-ARP Rental Housing)

Set the minimum construction and ongoing condition standards for HOME-ARP–assisted rental housing, along with inspection, documentation, and enforcement requirements during construction and throughout the affordability period. These standards implement [24 CFR 92.251](#) and HUD’s national condition standards at [24 CFR 5.703](#), as modified for HOME-ARP by Notice [CPD-21-10](#).

Construction Standards *(applicable to construction or substantial rehab)*

Minimum requirements at project completion:

- **Codes & inspections.**
New construction must meet applicable state/local building, residential, and related codes (or IRC/IBC where no local code exists). IGD/CD must conduct progress and final inspections against the construction contract and documents before marking the activity complete in HUD’s system. Rehabilitation projects must also meet applicable state and local codes pursuant to [24 CFR 92.251](#), as modified by HUD Notice CPD-21-10.
- **Accessibility.**
Comply with Section 504 ([24 CFR part 8](#)), ADA Titles II/III ([28 CFR parts 35](#) and [36](#)), and Fair Housing Act design & construction ([24 CFR 100.205](#)) where applicable.
- **Energy efficiency.**
Meet the Secretary’s energy efficiency standards promulgated under [National Affordability Housing Act](#), as applicable.
- **Disaster mitigation.**

Incorporate disaster-resistant features appropriate to local hazards (e.g., flood, wind, wildfire) consistent with code and HUD requirements.

- **Broadband infrastructure.**

Provide broadband infrastructure in multifamily new construction, subject to limited exceptions, consistent with [24 CFR 92.251](#) and HUD's broadband rule.

IGD/CD will:

- Review and approve written cost estimates, construction contracts, and construction documents sufficient for inspection; perform and file progress and final inspection reports prior to IDIS completion.
- Maintain evidence of accessibility, energy, broadband, and mitigation compliance in the project file

Note. All HOME-ARP rental housing projects must complete the required environmental review under [24 CFR Part 58](#) prior to any choice-limiting action

Ongoing Property Standards

All HOME-ARP rental units and related building systems must remain decent, safe, sanitary, operable, and free of health/safety hazards throughout the affordability period, meeting [24 CFR 5.703](#) and applicable local code.

- Correction timelines.
 - Life-threatening deficiencies: correct within 24 hours.
 - All other deficiencies: correct within 30 days, or by an approved schedule if work requires longer (documented and tracked by IGD/CD).
 - (Consistent with HUD minimum condition standards and typical enforcement practice under [24 CFR 5.703.](#))
- Owner responsibilities.
 - Maintain all building systems, dwelling units, and common areas functionally adequate and operable; keep smoke/carbon monoxide detection and other safety measures compliant with HUD requirements.
 - Provide timely access for inspections and submit completion evidence for all cited deficiencies.

Inspection Standards & Frequency

IGD/CD will inspect HOME-ARP rental units using HQS (24 CFR 982.401) aligned to HUD's national standards at [24 CFR 5.703](#).

Frequency.

- Annual inspection of HOME-ARP assisted units (or representative sample per HUD guidance if authorized).
- Interim inspections when complaints, tenant reports, or earlier deficiencies warrant.

Documentation. IGD/CD will retain inspection forms, deficiency notices, owner responses, repair evidence, and clearance confirmations in the file for the required retention period

Note. HUD extended the [NSPIRE](#) compliance date for CPD programs (including HOME) to October 1, 2026. IGD/CD will transition from HQS to NSPIRE on that date, update checklists and

timelines, and notify owners of any changed correction categories and timeframes. Until then, HQS remains the inspection protocol.

Lead-Based Paint (LBP)

- **Applicability.**
For pre-1978 units, comply with the [Lead-Safe Housing Rule \(24 CFR part 35\)](#), including evaluation, hazard reduction, safe work practices, clearance, and tenant notification, as applicable to the activity.
- **Exemptions/new materials.**
New construction with all new materials is generally not subject to LBP hazard controls; however, acquisition/rehab of pre-1978 structures must follow Subparts J/K/M as applicable.
- **Disclosure.**
Provide the [EPA/HUD Lead Hazard Information Pamphlet](#) and required notices where applicable

Enforcement

If deficiencies are not corrected within required timeframes, IGD/CD may take one or more actions:

- Withhold progress payments or draws;
- Place the project on corrective action;
- Restrict tenant leasing until corrected;
- Require repayment for ineligible or noncompliant costs;
- Enforce deed restrictions/written agreement remedies;
- Refer to HUD, as appropriate.

Affordability Period

(for Rental Housing)

HOME-ARP Rental Housing is subject to a minimum 15-year affordability period, consistent with the HOME-ARP Notice and the enforcement standards of [24 CFR 92.252](#) (as modified).

The affordability period:

- Begins upon project completion as recorded in IDIS.
- Applies to each HOME-ARP-assisted unit for the full term.
- Requires ongoing compliance with rents, QP occupancy, tenant protections, and property standards during the entire period.

IGD/CD will coordinate with all project funding sources to ensure the final affordability period meets or exceeds requirements across programs.

Rent Requirements include:

- Rents must be affordable to Qualifying Populations (QPs), based on the PJ's determination of the household's income under [24 CFR 5.609](#) as modified by the HOME-ARP Notice.

- Household contribution toward rent may not exceed what is considered affordable based on the PJ's income determination (generally capped at 30% of adjusted income, unless a deeper limit is required by another funding source).
- Utility allowances must be applied where utilities are tenant-paid.
- If project-based rental assistance is provided, tenant contribution is limited by the rules governing that subsidy.

Projects with multiple funding sources must comply with the most restrictive rent limit applicable to the HOME-ARP-assisted units.

Enforcement Mechanisms

Affordability restrictions will be enforced through recorded instruments consistent with [24 CFR 92.504](#) and the HOME-ARP Notice enforcement provisions.

These instruments will:

- Run with the land for the full affordability period.
- Bind all successors, assigns, and future owners.
- Remain enforceable regardless of:
 - loan payoff,
 - repayment of HOME-ARP funds, or
 - transfer of ownership.
- Provide IGD/CD authority to enforce compliance through legal or equitable remedies, including specific performance.

Restrictions must be recorded prior to final HOME-ARP disbursement in accordance with Illinois state recordation law.

Occupancy Requirements

Occupancy of HOME-ARP-assisted units must follow the eligibility and targeting requirements in the HOME-ARP Notice. These include:

- At least 70% of HOME-ARP units must be occupied by Qualifying Populations (QPs) as defined in CPD-21-10. The 70% QP occupancy requirement applies to the Participating Jurisdiction's HOME-ARP rental housing portfolio as a whole, unless the County elects to apply the requirement at the project level.
- Non-QP low-income households may occupy up to 30% of assisted units, if permitted by the PJ and project plan.
- IGD/CD must verify income (when applicable) and QP eligibility at initial occupancy and annually as required. Income determinations are required only for low-income households occupying the up to 30% of units not restricted to QPs. QP households may not be income-screened.

If units are not leased within HUD's reasonable timeframe, IGD/CD must implement corrective measures, including adjustments to the Affirmative Marketing Plan or targeted outreach. Failure to maintain required occupancy may result in corrective action or enforcement under the recorded affordability instrument. Projects containing HOME-ARP assisted rental units must comply with the County's Affirmative Marketing Policy pursuant to [24 CFR 92.351](#).

Noncompliance and Remedies

Noncompliance with affordability requirements may result in:

- Corrective Action Plans,
- Stop-payment or suspension of draws,
- Repayment of ineligible costs,
- Legal remedies under the recorded restriction,
- Additional actions permitted under the HOME-ARP Notice or written agreement.

Recording Requirements

All affordability restrictions must be:

- Recorded prior to the final HOME-ARP disbursement,
- Included in the project file, and
- Maintained in accordance with HOME recordkeeping standards under [24 CFR 92.508](#).

These documents will remain in effect for the full affordability period.

SECTION 9: UNDERWRITING & SUBSIDY LAYERING

Underwriting (*Rental Housing Only*)

Prior to commitment, IGD will complete underwriting consistent with 24 CFR 92.250(b) (as applicable) and CPD modifications, to confirm:

- Feasibility across the entire affordability period (dev budget, operating budget, DSCR, reserves).
- Cost Reasonableness relative to market conditions and proposed scope. IGD/CD will evaluate market conditions to confirm demand for the proposed units and prevent oversupply, as required under [24 CFR 92.250\(b\)](#).
- Appropriate Reserve Sizing, including OCAR (if used) and replacement reserves aligned with property needs. For projects utilizing an Operating Cost Assistance Reserve (OCAR), IGD/CD will assess operating feasibility both with and without the reserve to determine appropriate reserve sizing.
- Minimum Necessary HOME-ARP Investment (avoid over-subsidization).
- IGD/CD will evaluate the developer's experience, financial capacity, staffing, and organizational ability to carry out the project successfully, consistent [with 24 CFR 92.250\(b\)](#).
- Affordability and rent feasibility for HOME-ARP assisted units, including compliance with HOME-ARP rent limits and utility allowance requirements throughout the affordability period.

Underwriting conclusions and assumptions will be documented in the project file.

Subsidy Layering Analysis (*Rental Housing Only*)

When projects include multiple public sources (e.g., LIHTC, state/local funds, other federal assistance), IGD will conduct a Subsidy Layering Analysis (SLA) to ensure:

- No duplication of federal benefits,
- HOME-ARP subsidy is the minimum necessary for viability, and
- Total public assistance is not excessive relative to need and costs. This analysis is required under HOME program standards and applied to HOME-ARP rental housing as applicable.

Note. This includes analysis of LIHTC, CDBG-DR/MIT (if applicable), state housing trust funds, tax-exempt bonds, and other federal or state subsidies.

SECTION 10: PROJECT/ACTIVITY SELECTION

This section establishes St. Clair County’s standards and procedures for selecting, evaluating, underwriting, and committing HOME-ARP funds to Supportive Services and Affordable Rental Housing Development identified in the County’s approved [HOME-ARP Allocation Plan](#). All procedures are implemented consistent with [HUD Notice CPD-21-10](#) and applicable provisions of [24 CFR Part 92](#). Selection decisions will align with the priorities, gaps, and unmet needs identified in the County’s HOME-ARP Allocation Plan.

Procurement & Competition

St. Clair County will use open, competitive, and publicly announced solicitations to select HOME-ARP-funded projects and service providers. Each solicitation will:

- Identify eligible uses and costs under HOME-ARP (as applicable to the solicitation).
- Incorporate Qualifying Populations (QPs) eligibility and the County’s adopted Preferences (QP1, QP3).
- Specify minimum organizational and financial capacity thresholds and required documentation.
- Describe the evaluation criteria, scoring rubric, and decision process.
- State applicable federal requirements (e.g., civil rights, accessibility, Part 58, recordkeeping).

Solicitations will be posted on the County website and shared via County communication channels. No entity will receive HOME-ARP funds outside a documented, competitive process.

Project Selection Process

1) Supportive Services

IGD will issue a public solicitation focused on Supportive Services that address identified gaps from the Needs Assessment and stakeholder consultation (e.g., prevention/diversion, stabilization, wrap-around supports). The solicitation will clearly:

- List allowable service categories and cost items under [CPD-21-10](#) (e.g., McKinney-Vento services, homelessness prevention, housing counseling).
- Require alignment with the County’s Preferences (QP1 & QP3) and use of the HOME-ARP Expanded CE referral posture described in Section 4.
- Describe outcome expectations, reporting, and documentation standards.
- Describe compliance with cross-cutting requirements (e.g., VAWA confidentiality, LEP, ADA/504).

Evaluation and Scoring

Applications will be scored using transparent criteria, which may include:

- Ability to serve and document HOME-ARP QP eligibility using HUD’s evidence order.
- Experience with homeless services and DV/trafficking survivors; trauma-informed practices.

- Service design’s fit with local unmet needs and gaps.
- Coordination and data-sharing protocols with CE (consistent with survivor safety).
- Cost reasonableness and clear budget justification.
- Organizational capacity, internal controls, and performance history (including timely reporting).
- Organizational capacity and readiness to implement the proposed services

Awards and Agreements

IGD will publicly announce awards and execute written agreements specifying eligible costs, performance metrics, reporting, recordkeeping, monitoring, and closeout requirements consistent with [CPD 21-10](#) and [Part 92](#).

2) Affordable Rental Housing Development

IGD will release a formal Request for Proposals (RFP) for HOME-ARP Rental Housing Development and provide an application window (as stated in the solicitation). The RFP will:

- Specify HOME-ARP rental requirements (QP targeting, rent/occupancy restrictions, property standards, minimum compliance period).
- Describe environmental review requirements ([24 CFR Part 58](#)) and timing (choice-limiting action restrictions).
- State accessibility, Fair Housing, and site and neighborhood standards expectations.
- Indicate whether Operating Cost Assistance Reserve (OCAR) will be considered and how it must be sized/monitored.

Evaluation & Scoring

Development proposals will be scored on:

- Capacity & Track Record: developer experience, team qualifications, successful compliance history.
- Financial Feasibility: credible sources/uses, leverage, long-term operating pro forma.
- Cost Reasonableness: development and operating costs tested against local benchmarks and scope.
- Targeting & Services: clear plan to serve QPs; service partnerships for housing stability.
- Site Feasibility: readiness, zoning, environmental feasibility, Fair Housing considerations.
- Sustainability: reserves, risk mitigation, and long-term viability.
- Minimum Necessary HOME-ARP Investment, consistent with 24 CFR 92.250(b).

Awards and Agreements

IGD will announce awards and execute HOME-ARP written agreements documenting funds committed, affordability and compliance periods, rent and occupancy restrictions, property standards, recordkeeping, monitoring, and enforcement remedies per [CPD 21-10](#) and [Part 92](#).

SECTION 11: WRITTEN AGREEMENTS

St. Clair County must execute a HOME-ARP written agreement with every entity that receives HOME-ARP funds, consistent with Notice [CPD-21-10](#) (program administration & alternative

requirements) and applicable provisions of [24 CFR part 92](#) (including the written agreement standards). No funds may be committed or disbursed before a fully executed agreement is in place.

St. Clair County's Allocation Plan establishes that IGD will administer only the administrative portion directly and will fund Supportive Services and Affordable Rental Housing Development through open solicitations/RFPs with public award announcements; written agreements flow from those selections.

General Requirements for All HOME-ARP Agreements

Each agreement must, at minimum, include:

- Activity scope & eligible uses tied to the applicable HOME-ARP eligible activity in [CPD-21-10](#) (e.g., Supportive Services categories; Rental Housing requirements).
- Award amount, term, milestones, and performance outcomes.
- Qualifying Populations (QPs) eligibility and documentation standards, agreement must reflect St. Clair County's adopted preferences (QP1 Homeless; QP3 Fleeing DV/SA/Stalking/Trafficking) and participation in the County's HOME-ARP Expanded CE referral process
- Civil rights, fair housing, equal access, accessibility ([24 CFR 5.105\(a\)](#); Section 504/ADA) clauses.
- Recordkeeping & reporting requirements per [CPD-21-10](#) (Section VIII.F) and [Part 92](#); cooperation with County/HUD monitoring and Single Audit, as applicable.
- Financial management & internal controls consistent with [2 CFR 200.303](#); cost allowability and documentation.
- Duplication of benefits prevention (where relevant) and remedies/termination for non-performance.
- Conflict-of-interest compliance

VAWA tenant protections. Where agreements touch rental occupancy or TBRA in the future, include VAWA requirements at [24 CFR 92.359](#) (notice/certification, lease bifurcation, emergency transfer).

Agreements with Supportive Services Providers

- **Scope & eligible services.**
Define the HOME-ARP-eligible service set being funded (McKinney-Vento services; homelessness prevention; housing counseling) and explicitly limit billing to costs authorized in [CPD-21-10](#).
- **Eligibility & preferences.**
Require providers to verify QP eligibility and apply County preferences (QP1 & QP3) through Expanded CE referrals; include confidentiality protections for survivors per VAWA and County CE policy.
- **Performance & reporting.**
Specify outputs/outcomes, reporting cadence, and data elements; require cooperation with County monitoring and corrective action. Financial terms. Detail budget, invoicing, source documentation, cost allowability, internal controls, and audit access

Agreements with Affordable Rental Housing Developers

- **Project requirements.**

Identify HOME-ARP assisted units and applicable occupancy requirements, consistent with the Participating Jurisdiction's obligation to ensure that at least 70 percent of HOME-ARP rental units across its portfolio are occupied by households meeting a Qualifying Population definition; rent limits, property standards, and inspections.

- **Affordability period.**

Minimum 15-year compliance for HOME-ARP rental; include monitoring and reporting terms for the full period.

- **Operating Cost Assistance/OCAR (if used).**

State the reserve amount, eligible uses, sizing methodology, and annual review/true-up obligations.

- **Environmental review.**

Require completion and approval of the [Part 58](#) environmental review and compliance with choice-limiting action restrictions prior to commitment/construction.

- **Underwriting & SLA conditions.**

Attach County underwriting and subsidy layering results; include conditions precedent to closing and prohibition on over-subsidization [24 CFR 92.250](#)

- **Enforcement.**

Include default, cure, repayment, and deed restriction/land use restriction mechanisms to secure the affordability commitments.

Agreements with Subrecipients (if applicable)

If IGD engages a subrecipient for services or program delivery, the agreement must meet HOME §92.504 subrecipient standards and incorporate all applicable HOME-ARP requirements (activity-specific and cross-cutting), including data/reporting, monitoring, and corrective action provisions.

Agreements with Contractors (if applicable)

When IGD procures contractors (e.g., environmental review, data systems, evaluation), agreements must comply with 2 CFR 200.317–.327 procurement standards and include any HOME-ARP requirements relevant to the contracted task (confidentiality, records, access for monitoring/audit).

SECTION 12: ENVIRONMENTAL REVIEW REQUIREMENTS

All HOME-ARP funded projects must comply with the environmental review requirements at [24 CFR Part 58](#). No HOME-ARP funds may be committed, obligated, or expended until the required environmental review is completed and, when applicable, St. Clair County has obtained HUD's Authority to Use Grant Funds (AUGF). This prohibition includes any choice-limiting actions—such as acquisition, demolition, construction, rehabilitation, or any action that would limit reasonable project alternatives—consistent with [24 CFR 58.22](#).

St. Clair County IGD/CD maintains a stand-alone Environmental Review Policies and Procedures Manual that outlines the full requirements, review steps, responsible entities, and documentation standards. All Recipients/Subrecipients must follow the County's Environmental Policies and Procedures. The manual is available on the St. Clair County IGD/CD website ([St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)).

SECTION 13: FINANCIAL COMPLIANCE

Procurement and Contracting

All procurement conducted under HOME-ARP must follow the standards in 2 CFR 200.317–327 and the [St. Clair County IGD Financial Policies and Procedures Manual](#). The Financial Manual serves as the County’s adopted procurement policy and governs purchasing thresholds, competitive methods, cost reasonableness, and documentation requirements. All procurement records must be maintained and made available for monitoring and audit review.

Financial Management & Internal Controls

IGD/CD and all recipients/subrecipients of HOME-ARP funds must maintain financial systems that:

- Provide accurate, current, and complete financial disclosure; maintain audit trails; and safeguard assets.
- Implement effective internal controls (segregation of duties, approvals, reconciliations, access controls, PII protection).
- Implement reasonable cybersecurity controls to safeguard protected PII and sensitive information, consistent with [2 CFR 200.303](#).
- Follow Generally Accepted Accounting Principles and County financial policies.

Allowable, Allocable, and Reasonable Costs

Costs charged to HOME-ARP must be: allowable under [CPD-21-10](#) and the written agreement; allocable to the specific activity; reasonable and necessary; consistent with organizational policies; and adequately documented.

- Supportive Services costs must fall within HOME-ARP eligible service categories.
- Rental Housing development costs must meet HOME-ARP eligibility, underwriting, and property-standards requirements (including any OCAR provisions, if used).
- Administrative/Planning costs are capped per HOME-ARP requirements.

Note. All costs must also comply with [2 CFR 200 Subpart E](#) cost principles, including allowability, allocability, reasonableness, and consistency.

Reimbursements and Payment

HOME-ARP generally operates on a reimbursement basis. Payment requests must include:

- Detailed invoices/general ledger detail; proof of payment; required labor documentation for personnel; activity eligibility tie-back; and, where applicable, evidence of services delivered to QPs.
- The County reviews allowability, allocability, and documentation prior to approval.

IDIS Activity Setup, Drawdowns & Completion

IGD/CD is the system of record user for HOME-ARP in IDIS.

- Setup: Activities are set up only after environmental clearance (as applicable), eligibility documentation, a fully executed written agreement, and budget confirmation.
- Draws: Funds are drawn only after eligible costs are incurred and approved; draws must align to the correct activity and cost category; cash management timing is minimized.

- Completion: Activities are marked complete when all costs are drawn, beneficiary/performance data are reported, inspections (if any) are satisfied, and files are complete.
- No drawdowns may occur until all required source documentation is received and IGD/CD has approved the costs as eligible.

Program Income (PI) and Interest

While HOME-ARP PI is uncommon, any PI generated must be: deposited to the local HOME account, recorded in IDIS, used before new HOME-ARP funds are drawn, and used only for eligible HOME-ARP costs. Interest on advances follows the minimis rules under federal cash management. Interest earned on Federal advances must be handled in accordance with Federal cash management requirements at [2 CFR part 200](#) and HUD guidance.

Financial Reporting

Recipients/subrecipients/developers must submit financial reports as specified in their written agreement (e.g., monthly or quarterly expenditure detail; budget-to-actuals; OCAR reserve reports, if applicable). IGD/CD reviews for allowability, timeliness, documentation sufficiency, and consistency with IDIS draws.

Recordkeeping and Retention

Recordkeeping follows [24 CFR 92.508](#) (as modified by HOME-ARP) and the Financial Manual's methods for collection, storage, and destruction. Minimum retention periods:

- Rental Housing: property standards/occupancy/compliance records for the affordability period, but not less than 15 years.
- All other HOME-ARP activities: 5 years after project closeout, unless a longer period applies under federal award terms.
- Audits: 3 years after final audit resolution / final expenditure report. Files must contain financial source docs, written agreements, environmental records, monitoring, CAPs, and beneficiary/QP documentation

Financial Monitoring and Corrective Actions

IGD/CD performs risk-based desk and onsite financial monitoring of recipients/ subrecipients/ owners including: source documentation testing, general ledger tie-outs, draw reconciliation to IDIS, review of procurement and cost analyses (as applicable), and verification of internal controls. Findings/concerns lead to written CAPs, follow-up, and potential disallowance/repayment. IGD/CD will apply a formal risk-assessment methodology to determine the frequency and depth of financial monitoring for each entity, consistent with [24 CFR 92.504\(a\)](#).

SECTION 14: IDIS MANAGEMENT

IGD/CD is responsible for IDIS activity setup, budget management, draws, revisions, and completion. These requirements implement HOME-ARP provisions under [CPD-21-10](#). IGD/CD must revise IDIS activities as needed to reflect changes in budgets, accomplishments, unit counts, QP occupancy data, or activity status consistent with HUD IDIS guidance.

Activity Setup

Before an IDIS activity may be set up, the following must be complete:

- 1) **Environmental Review**
All environmental requirements must be satisfied and no choice-limiting actions taken.
- 2) **Written Agreement Fully Executed**
No funds may be committed or drawn before execution.
- 3) **Budget & Matrix Codes Entered**
Activity funding amounts must align with the approved budget.
- 4) **Project Details Entered**
Activity type, QP focus, unit count (if rental), and expected outcomes.

All documentation supporting setup must be retained in the program file.

Drawdowns

Draws must follow federal cash management requirements and HOME-ARP reimbursement rules. IGD/CD will ensure:

- Draws occur only after costs are incurred and supported by source documentation.
- Draw amounts match invoices, payroll detail, or eligible cost statements.
- Draws are applied to the correct activity, cost category, and year.
- Remaining balances are monitored to avoid over-draw or underutilization.
- No draws may be made in IDIS until all required eligibility and cost documentation has been received and approved.

All drawdown records—including disbursement forms, invoices, and IDIS draw reports—must be retained for at least five (5) years after final draw.

SECTION 15: PROJECT CLOSEOUT

Closeout confirms that a HOME-ARP activity has met all performance, financial, and reporting requirements per [24 CFR 92.504](#) and [92.508](#)

- 1) **Activity Completion & Final Documentation**
 - Final inspection (if applicable).
 - Verification of QP eligibility for all assisted households.
 - Review of income verification, leases, rent schedules (rental housing only).
 - Verification of supportive service outcomes and performance metrics.
 - Confirmation that the Environmental Review Record (ERR) approval, including the RROF/AUGF where applicable, is complete and filed, consistent with [24 CFR Part 58](#).
- 2) **Final Draw & Financial Reconciliation**
 - Submission of final reimbursement packet.
 - Verification that all HOME-ARP funds have been drawn or deobligated.
 - Title company or financial agent submits final disbursement register, if applicable.
 - IGD/CD reconciles all HOME-ARP project costs, including any program income considerations.
 - Confirm that no remaining unspent funds or lingering balances remain in IDIS for the activity.
- 3) **IDIS Project Completion**
 - IGD/CD marks the activity complete.
 - A certificate or completion confirmation is added to the physical and electronic file.

- Beneficiary, QP, and performance data must be verified for accuracy and completeness before IDIS completion is submitted
- 4) **Transition to Affordability Period Monitoring** (*Rental Only*)
- Confirm affordability period start date.
 - Establish annual monitoring cycle (inspections, rent reviews, income checks).
- 5) **Closeout Notification**
- IGD/CD issues a written closeout confirmation to the provider/owner.
 - File is flagged for affordability monitoring or post-completion reporting.
- 6) **File Finalization & Archiving**
- All required documentation is organized per the HOME-ARP File Checklist.
 - Files are archived securely for the full retention period (affordability period and five years thereafter or five years after project closeout for other activities).
 - Records remain available for HUD monitoring or audit.

SECTION 16: RECORD-KEEPING REQUIREMENTS

Accurate and thorough record-keeping is required to demonstrate compliance with federal regulations related to the administration of HOME-ARP funds. Record-keeping requirements are governed by [24 CFR 92.508](#) and the HOME-ARP Notice [CPD-21-10](#) unless otherwise modified by HUD. These records must support eligibility determinations, financial accountability, performance reporting, and monitoring or audit inquiries.

[24 CFR 92.508](#) requires participating jurisdictions to maintain project records, financial records, program files, written agreements, and compliance documentation for HOME-funded activities. The HOME-ARP Notice [CPD-21-10](#) further requires maintaining documentation of Qualifying Population (QP) eligibility, preferences, and activity-specific compliance.

Category	Required Records
General Administration	<ul style="list-style-type: none"> • HUD Award Letter and Allocation Documentation • HOME-ARP Allocation Plan Approval CPD-22-13 • Executed Written Agreements & Amendments • Environmental Review Record (ERR) • Construction Contracts • Documentation of applicable waivers or alternative requirements under HOME-ARP Notice
Eligibility & Qualifying Populations	<ul style="list-style-type: none"> • QP eligibility documentation requirements (evidence hierarchy, self-certification, third-party verification, CE referral, etc.) • Documentation supporting preferences or referral methods • Records supporting household income determinations when required
Procurement & Contractor Selection (if applicable)	<ul style="list-style-type: none"> • Procurement method and justification per 2 CFR 200 • Contractor selection criteria and evaluation • Cost or price analysis

	<ul style="list-style-type: none"> • Bid advertisement, bids received, and tabulation • Executed contracts with vendors or subrecipients • SAM.gov verification for contractors
Financial & Compliance Records	<ul style="list-style-type: none"> • Financial ledgers and documentation of fund use • Eligible cost justification per 24 CFR 92.206 (eligible HOME costs) • Draw request packets, invoices, and payment documentation • IDIS drawdown reports and supporting evidence • Indirect cost documentation if applicable • Program income (if generated) records consistent with 24 CFR 92.503
Rental Housing (HOME-ARP Rental Activity)	<ul style="list-style-type: none"> • Written agreement with owner • Project development budget and pro forma • Rent schedules, utility allowances, and income determinations • Property standards inspections (HQS / NSPIRE) • Lease agreements and VAWA documents • OCAR documentation
Supportive Services	<ul style="list-style-type: none"> • Service delivery logs • Documentation of eligible services provided • Monthly/quarterly performance reports • Confidentiality logs
IDIS Documentation	<ul style="list-style-type: none"> • IDIS Activity Setup documentation (activity type, budget, QP information) • IDIS Draw Reports & reconciliation • IDIS Completion Report and data entry • Evidence supporting all IDIS entries
Monitoring & Reporting	<ul style="list-style-type: none"> • Internal monitoring checklists and notes • Monitoring reports issued by IGD/CD • Corrective Action Plans (CAPs) and follow-up documentation • HUD correspondence, technical assistance, and approvals
Confidentiality & Privacy Records	<ul style="list-style-type: none"> • Documentation of data security measures • QP3 confidentiality procedures (DV/SA/stalking/trafficking protections) • Secure PII storage verification
Public Access & Transparency	<ul style="list-style-type: none"> • Public notices, public comment documentation, and Allocation Plan postings per CPD-22-13 requirements • Records made available in compliance with state/local privacy laws

Financial Retention

IGD/CD and all HOME-ARP recipients must maintain records for the periods required under [24 CFR 92.508](#), which establishes federal retention standards for HOME and HOME-ARP activities. These requirements ensure that eligibility, financial, and compliance documentation remains available for HUD monitoring, audits, and program review.

Records must be stored securely, accessible for federal review, and protected in accordance with confidentiality and privacy requirements outlined in the HOME-ARP [Notice CPD-21-10](#) for all Qualifying Populations, including enhanced protections for QP3 households

Retention Period	Documents That Must Be Retained
<p>5 Years After Project Closeout in IDIS</p>	<ul style="list-style-type: none"> • Written Agreements & Amendments • Environmental Review Records • Project setup documentation • QP eligibility documentation (QP1–QP4) • CE referral documentation (if applicable) • Procurement documentation (method, bids, selection) • Performance and outcome reporting • Monitoring reports and Corrective Action Plans • Correspondence with HUD or IGD/CD
<p>5 Years After Final Drawdown</p>	<ul style="list-style-type: none"> • Reimbursement packets and invoices • Cost reasonableness documentation • General ledgers & expenditure records • IDIS draw reports and supporting documentation • Program income tracking (if applicable) • Internal financial review and approval documentation
<p>5 Years After End of Affordability Period (Rental Housing Only)</p>	<ul style="list-style-type: none"> • Tenant eligibility and QP documentation • Leases and rent schedules • Income verifications (if required under HOME-ARP) • HQS/NSPIRE inspection records • Annual monitoring reports • Utility allowance documentation • OCAR reserve records (if applicable)
<p>For the Program Year in Which PI was Generated + 5 Years</p>	<ul style="list-style-type: none"> • Program income received • PI expenditure documentation • PI reconciliation and financial tracking reports
<p>Until All Findings Are Resolved</p>	<ul style="list-style-type: none"> • Audit records • Monitoring findings and responses • HUD compliance reviews • Investigations and related correspondence

Retained for Applicable Period + Enhanced Confidentiality Measures	<ul style="list-style-type: none"> • QP3 (DV/SA/Stalking/Trafficking) documentation • Any record containing PII requiring confidentiality protections under CPD-21-10 • Survivor contact/safety documentation • Restricted-access files demonstrating confidentiality compliance
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SECTION 17: CONFIDENTIALITY

All HOME-ARP–funded programs must abide by, and maintain written policies consistent with, the privacy and confidentiality requirements in the HOME-ARP Notice [CPD-21-10](#) and applicable provisions of [24 CFR Part 92](#). Providers must protect personally identifiable information (PII) and maintain strict confidentiality for all clients, with enhanced protections for QP3 households (survivors fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking)

Refer to the County’s stand-alone VAWA, Coordinated Entry (CE), and HMIS policies for detailed procedures, survivor routing, data-sharing limits, and forms. These policies govern implementation for all providers and take precedence where they are more protective than this manual.

Confidentiality Standards

- **Non-disclosure (VAWA)**
No provider, contractor, or staff member may disclose PII or information related to a person’s experience of DV/SA/stalking/trafficking without the survivor’s informed, written, time-limited consent, except where disclosure is required by law and handled consistent with VAWA ([24 CFR 5.2005](#)) and [24 CFR 92.359](#).
- **Restricted-access files (QP3)**
Records for QP3 households must be kept in restricted-access files, stored separately from general client records, and shared only with staff with a legitimate need to know, consistent with CPD-21-10 confidentiality expectations.
- **Cybersecurity & PII safeguards**
Providers must implement reasonable cybersecurity controls and other measures to safeguard PII and sensitive information, in accordance with [2 CFR 200.303](#).
- **HMIS/CE entries**
Survivor-identifying information must not be entered into HMIS or CE unless allowed under VAWA and local CoC confidentiality protocols, as specified in the stand-alone CE/HMIS policies.
- **Written procedures & training**
Providers must maintain written confidentiality and data-security procedures and train staff at least annually, and records must remain available to the PJ/HUD for monitoring and audit, consistent with [24 CFR 92.504](#) and [CPD-21-10](#).

- **Retention & storage**

Files must include only the minimum data necessary to document QP eligibility, services, and outcomes; be stored securely (locked or password-protected); and be retained per [24 CFR 92.508](#).

SECTION 18: MONITORING

The St Clair County Intergovernmental Grants Department (IGD)/ Community Development Group (CD) is responsible for ensuring all HUD-funded programs, including HOME-ARP AND HOME, are implemented in compliance with applicable federal regulations, program requirements, and written agreements.

IGD/CD conducts internal self-monitoring to assess program performance, identify areas for improvement, and proactively address compliance issues. Monitoring activities are guided by HUD regulations, including [2 CFR Part 200](#), applicable Federal Register Notices, and the County's internal Compliance Monitoring Policy and Procedures Manual, available on [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

APPENDIX I ADDITIONAL RESOURCES

To access the following policies and procedures, along with other helpful information, please visit the St. Clair County website:

[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)

- St. Clair County Intergovernmental Grants Department Financial Policies and Procedures.
- St. Clair County IGD Environmental Policies and Procedures
- St. Clair County Public Facilities and Infrastructure Policies and Procedures
- St. Clair County CDBG-DR Policies and Procedures
- St. Clair County Lead Policies and Procedures Manual
- St. Clair County Duplication of Benefits Policies and Procedures
- St. Clair County Anti-Displacement and Relocation Policies and Procedures
- St. Clair County IGD Anti-Fraud, Waste, and Abuse Policies and Procedures
- St. Clair County IGD-CD Section 504 Policy
- St. Clair County IGD Compliance Monitoring Policies and Procedures Manual
- St. Clair County Continuum of Care II 508 Coordinated Entry System Policy and Procedures
- East Saint Louis/ Belleville/ Saint Clair County Continuum of Care II 508 Homeless Management Information Systems (HMIS) Policies and Procedures Manual

To access additional information and resources, please visit the HUD exchange website:

- [HOME-ARP Program - HUD Exchange](#)
- [HOME: HOME Investment Partnerships Program - HUD Exchange](#)
- [Final HOME-ARP Notice Revision final](#)
- [CPD 21-10](#)
- [HOME-ARP Policy Brief: URA and Section 104\(d\) - HUD Exchange](#)
- [Text - H.R.1319 - 117th Congress \(2021-2022\): American Rescue Plan Act of 2021 | Congress.gov | Library of Congress](#)

REVISION HISTORY

Event	Date
Adopted revisions	4.14.26