# KENDALL HOUSING AUTHORITY RESOLUTION NO. 2020 – 03 ADMINISTRATIVE PLAN REVISIONS

## BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE KENDALL HOUSING AUTHORITY (KHA), as follows:

**Section 1:** It is in the best interests of the Kendall Housing Authority to take the following action:

Approve the attached twelve revisions to the Kendall Housing Authority Administrative Plan: A change in Chapter 1.III.A (Admin Plan to include Family Unification Program and Mainstream), two revisions in Chapter 2-II.A (Definition of Reasonable Accommodation) and 2-II.B (Request for an Accommodation), two changes in Chapter 3 (3.III.B Other reasons for denial, 3.III.C Screening), two changes in Chapter 4 (4-III.A Programs with Special Admission Procedures & 4.III.B Selection and HCV Funding Sources), a clarification in Chapter 5-II.B (Subsidy Standard for Certified Family Voucher Size and Maximum Family Unit Size), another change in Chapter 8.II.C (Annual/Biennial Inspections) and 10-II-C. (Initial Moves for Applicant Families) 15-VIII.B (Eligibility and Recruitment), and lastly, the inclusion of Part XI (Mainstream HCV Program)

**Section 2:** This Resolution is effective upon its adoption.

Approved by the Kendall Housing Authority Board of Commissioners on the 28th day of February, 2020.

Robyn Ingemunson

Vice-Chair

Tom Grapt

Secretary/Treasurer

Ayes:

4

Nays:

0

Abstain:

0

\*\* Proposed changes in italics \*\*

### #1

#### 1-III.A. ADMINISTRATIVE PLAN

KHA Policy: The KHA Plan is applicable to the operation of the Housing Choice Voucher program and the Project-based Voucher programs. In addition, the KHA Plan addresses policies, in whole or in part for the following: Single room occupancy (SRO), Congregate Housing, Group Home, Shared Housing, Cooperative Housing (excluding families that are not cooperative members), Manufactured Home (where family owns the home and leases the space), Family Unification Program (FUP), Family Unification Program – Youth (FUP-Youth), Veteran's Affairs Supportive Housing (VASH), Mainstream, Homeownership, Family Self-Sufficiency (FSS), Rental Assistance Demonstration (RAD) and the Regional Housing Initiative (RHI).

A person with a disability may require special accommodations in order to have equal access to the HCV program. The types of Reasonable Accommodations *KHA* can provide include changes, exceptions, or adjustments to a rule, policy, practice, or service.

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for *KHA* or result in a "fundamental alteration" in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

#### 2-II.A. DEFINITION OF REASONABLE ACCOMMODATION

## #2

➤ KHA Policy: Although in the housing context, the regulatory definition of a Reasonable Accommodation is, "a change in a rule, policy, practice, or service that may be necessary to allow a person with a disability the equal opportunity to use and enjoy a dwelling", KHA extends this definition to include persons who are ill, elderly or who otherwise have extraordinary, extenuating circumstances as determined by KHA.

## #3

### 2-II.B. REQUEST FOR AN ACCOMMODATION

Requests for Additional Bedroom as a Reasonable Accommodation

An additional bedroom is the most frequent Reasonable Accommodation request
made and also the request most often abused because the additional bedroom is
not used in the manner indicated in the request and approved by KHA.

- > KHA Policy: The request for an additional bedroom will only be approved as a Reasonable Accommodation for a person with disabilities, and can only be used:
  - 1. as a bedroom, used for sleeping, or
  - 2. as a non-bedroom, used as a medical necessity.
    - As a bedroom, used for sleeping. The additional bedroom can only remain a bedroom, used for sleeping, in the case of a live-in-aide approved by KHA, or as a medical necessity indicated by a medical professional. The medical professional must document there is a direct, identifiable relationship, or nexus, between the requested accommodation of an additional bedroom, used for sleeping, and the individual's disability as a matter of need and use, and not of convenience.
    - As a non-bedroom, used for medical necessity. A medical professional must document there is a direct, identifiable relationship, or nexus, between the requested accommodation of an additional room and the individual's disability as a matter of need and use, and not of convenience. The room configuration cannot include unrelated, non-medical items or items of furniture typically associated with a bedroom including regular beds, couches, futons, sofas, pallets, chairs, or other similar items unless the room was indicated by a medical professional as necessary to be used as a bedroom, used for sleeping, for a household member.
    - Storage. The additional room cannot be used for storage unless the items stored (housed) have a direct, identifiable relationship, or nexus, between the requested accommodation (approved by KHA) and the individual's disability as a matter of need and use, and not of just convenience or preference. Specific items of actively-used medical necessities generally defined as apparatus and other equipment typically needed and used on a regular daily or weekly schedule can be housed in the room because of the type, size of the equipment in relation to the unit, volume of parts of the equipment in relation to the unit and the number of household members certified by KHA for the unit, and the need to be conveniently located in the space.

Requests for additional bedrooms are reviewed annually and granted on a case by case basis at the sole discretion of KHA. Approved requests will be confirmed by KHA during the unit's annual or biennial inspection cycle for compliance. KHA also reserves the right to allow exceptions to this policy when deemed warranted or required.



### 3-III.B. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE

#### **Pattern of Previous Criminal Behavior**

A pattern of previous criminal behavior refers to repeated conduct of an offender that leads to and including the commission of an act committed in violation of law where the consequence of conviction by a court is punishment, especially where the punishment is a serious one such as imprisonment or confinement. These criminal

acts are offenses against the public and can be any act or omission or possession which poses a threat or otherwise harms the public in some way.

➤ KHA Policy: KHA can terminate assistance, or deny assistance to an otherwise eligible family, if the family or members of the family or household, exhibited a pattern of repeated conduct by the offender of four (4) or more instances within a five (5) year period that lead to or included the commission of an act in violation of law where the consequence of conviction by a court is imprisonment or confinement for any period.

## #5

#### 3-III.C. SCREENING

#### **Initial Screening**

The following Screening Criteria Grid will be used to analyze whether an applicant should be admitted or subject to further review. Applicants with convictions not listed in the Screening Criteria Grid are admissible for purposes of criminal background screening. Applicants with one or more convictions that fall in any of the categories described in the Grid will be reviewed further following the procedures outlined below.

#### **Screening Criteria Grid**

The Screening Criteria Grid should be used when performing criminal background screening. Specialist can depart from the grid if an applicant has one or more convictions (for felonies or misdemeanors) that do not fall within the Screening Criteria Grid, and the Specialist has grounds to believe that the applicant presents a significant level of risk to the KHA program. The Specialist should, after providing case-specific reasons, refer the case to the Program Manager for review.

Notwithstanding anything to the contrary herein, KHA and property owners will comply with all Federal laws and regulations, and state law. The Grid outlines "lookback periods." These are the time periods for which KHA can consider past criminal convictions:

Categories of Crimes and "look-back" periods for which further review is required

Type	#	Crime Category	Subcategory	Review
	1	Assault and battery	Felony only	Further review if
Crimes Against Persons	2	Misdemeanor domestic violence	All	within 5 years of release from correctional supervision from date of screening
	3	Use of firearm against a person	Further re	Further review
	4	Armed robbery offenses		

5	Robbery offenses, no weapon involved		Further review if within 5 years of release from correctional supervision from date of screening
6	Intentional homicides		
7	Manslaughter		Further review
8	Kidnapping and abductions		Futulet teview
9	Sex offenses - forcible		
10	Sex offenses – non-forcible	Felony only and Peeping Tom misdemeanor	Further review if within 5 years of release from correctional
11	Stalking	All	supervision from date of screening

Type	#	Crime Category	Subcategory	Review
	12	Arson-related offenses	All	Further review
	13	Burglary/Breaking and Entering-related offenses	Felony only	Further review if
Crimes Against Property	14	Theft, stolen property, fraud-related offenses	If 3 or more felony convictions	within 5 years of release from correctional supervision from date of screening
	15	Destruction/ damage/ vandalism of property offenses	Felony only	

Туре	#	Crime Category	Subcategory	Review
	16	Drug offenses - possession	If 3 or more felony convictions	Further review if within 5 years of
	17	Drug offenses - Manufacture, Distribution, or Possession with intent to distribute	All	release from correctional supervision from date of screening
	18	Driving under the influence-related offenses	If 3 or more convictions	Further review if within 3 years of release from correctional supervision from date of screening
	19	Weapons offenses (other than use of a firearm against a person)	All	Further review if within 5 years of release from correctional

	2 27022	supervision from
		date of screening

Type	#	Crime Category	Subcategory	Review
Pattern of Behavior /Multiple offenses - Misdemeanor	20	#2, 5, 10, 11, 13, 14, 15, 16 or 18	If 3 or more	Further review if 3 convictions are within previous 5 years from date of screening
Pattern of Behavior /Multiple offenses - Felony	21	#1, 3, 4, 6, 7, 8, 9,10, 12, 17 or 19	convictions	Further review if 3 convictions are within previous 10 years from date of screening

## #6

### 4-III.A. PROGRAMS WITH SPECIAL ADMISSION PROCEDURES

NOTE: Special-purpose subsidies may include Tenant-Based vouchers; vouchers issued directly to service providers; vouchers with special rent calculation formulas; and special occupancy vouchers. These programs include Veterans Affairs Supported Housing or VASH, whose vouchers are filled with referrals made through the US Department of Veterans Affairs (VA), and 2019 Mainstream Housing Choice Vouchers which are targeted vouchers for disabled persons between 18 and 61 years of age.

## #7

### 4-III.B. SELECTION AND HCV FUNDING SOURCES

Targeted Funding

- > KHA Policy: KHA administers the following types of Special Admissions with targeted funding:
  - Family Unification Program (FUP)
  - Family Unification Program Youth (FUP Youth)
  - 2019 Mainstream Housing Choice Vouchers
  - Veteran's Affairs Supportive Housing (HUD-VASH)

## #8

# 5-II.B. SUBSIDY STANDARD FOR CERTIFIED FAMILY VOUCHER SIZE AND MAXIMUM FAMILY UNIT SIZE

> KHA Policy: The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding. The following principles

govern the size of the subsidy for which an applicant or participant household will qualify:

- One (1) bedroom is allotted for every two (2) persons.
- One (1) bedroom is allotted for any live-in aide.
- Subsidy size will be determined by the household members present (including custody arrangements) at the time of initial certification or reexamination, with exception made for household members temporarily away for school or military service, or for children in temporary custody of an agency if there is expected reunification within the ensuing twelve-month period. For children in temporary custody of an agency, see [KHA Plan: Chapter 5-II.C.] below.
- In cases of joint legal or physical custody, the household will be awarded a
  bedroom only if it can satisfactory document to KHA, that over the immediate
  past twelve (12) months, the child has spent more than fifty percent (50%) of
  their time living with the household. This is defined as at least one hundred
  eighty-three (183) calendar days of the year, which do not need to run
  consecutively. In no event can a child receive federal subsidy concurrently at
  more than one unit.
- While a live-in aide may be assigned a bedroom, and added to the lease as a
  permitted occupant, the aide no matter their relationship to the head of
  household, co-head or any other household member has no survivorship
  rights to the subsidy. Single elderly or disabled households with a live-in aide will
  be assigned a two-bedroom subsidy.
- KHA will permit a live-in aide's family members to reside in the subsidized unit provided it does not violate HQS occupancy requirements under [24 CFR 982.401].
- Foster children or foster adults who are listed on the application or lease will also be housed in accordance with the guidelines above.

## #9

### 8-II.C. ANNUAL/ BIENNIAL INSPECTIONS

- KHA Policy: KHA reserves the right to conduct annual inspections as needed or determined by KHA for:
  - Units for families with a Reasonable Accommodation for an additional bedroom, typically approved by KHA to be used for medical equipment;
  - units that had any health and safety deficiency during its previous HQS inspection; or
  - units with multiple non-health and safety deficiencies for two or more consecutive years, that are identified by KHA to be prudent to inspect annually.
  - Beginning with inspections completed after *March 1, 2019*, KHA will conduct biennial inspections for units in properties that, (1) are identified as already inspected annually under a HUD approved local housing code enforcement program; (2) units that are part of a Project-based Voucher project and (3) units that receive a "Pass" score under HQS for two or more consecutive years. KHA

reserves the right to adjust the start date of the two-year period from *March 1*, **2019**.

## #10

### 10-II-C. INITIAL MOVES FOR APPLICANT FAMILIES

Delete C(4):

Paragraph (c) of this section does not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, as provided in [24 CFR Part 5, Subpart L](Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), and the move is needed to protect the health or safety of the family or family member, or any family member who has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move.

#### Add new sub-section:

# Exceptions to Initial Moves for Nonresident Applicants Outside of KHA's Jurisdiction Under Portability Procedures

When necessary for any nonresident applicants, KHA will comply with:

- Regulations under [24 CFR Part 5, Subpart L] (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, and the move is needed to protect the health or safety of the family or family member, or any family member who has been the victim of a sexual assault that occurred on the premises during the 90calendar-day period preceding the family's request to move;
- VAWA policies under [KHA Plan: Chapter 16, Part IX]; and
- Reasonable Accommodation policies under [KHA Plan: Chapter 2-II.A.] for nonresident persons who are ill, elderly, disabled, or otherwise who have extraordinary, extenuating circumstances as determined by KHA.

## #11

#### 15-VIII.B. ELIGIBILITY AND RECRUITMENT

KHA will regularly survey all HCV participants to determine their interest in the *FSS* program. Each Specialist will discuss the FSS Program opportunity when applicants, participants and Family Unification Program Youth (FUPY) attend their initial voucher issuance briefing at admission and at each annual reexamination. Applicants and participants who are interested in the program will be invited to schedule an appointment to meet with the Community Services Coordinators at Kendall County to make application for the FSS Program. *KHA will make a special effort to ensure that all FUP-eligible families and all FUP-eligible youth receive information on FSS and are encouraged to apply.* 

FUP Families – and especially FUP Youth – are a particular priority for FSS participation because the objective of the FSS program is to reduce the dependency on public or welfare assistance and on HCV, low income public

housing, or any Federal, State, or local rent or homeownership subsidies. Under the FSS program, FUP Families and FUP Youth are provided opportunities for education, job training, counseling, and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, and social skills necessary to achieve self-sufficiency.

## #12

## Part XI Mainstream Housing Choice Voucher

### 15-XI.A. Program Overview

The *HUD Mainstream Housing Choice Voucher Program* provides tenant-based vouchers to assist non-elderly persons with disabilities (defined as a household composed of one or more persons 18 to 61 years of age with disabilities, which may include additional household members who are not non-elderly persons with disabilities), particularly those who are transitioning out of institutional or other separated settings; at serious risk of institutionalization; currently experiencing homelessness; previously experienced homelessness and currently a client in a permanent supportive housing or rapid rehousing project.

This program helps to further the goals of the *Americans with Disabilities Act* by helping persons with disabilities live in the most integrated setting. The program also encourages partnerships with health and human service agencies with a demonstrated capacity to coordinate voluntary services and supports to enable individuals to live independently in the community.

### Move On Project Partnership

The **Move On Project** is a collaborative effort partnership between the Kendall Housing Authority (KHA) and the partner agencies who are members the **Will-Grundy and Kendall Counties Continuum of Care** (CoC) to help households transition into a Housing Choice Voucher (HCV) as they continue on to self-sufficiency.

Households for this project are generally Will-Grundy and Kendall Counties CoC partner agency clients, enrolled in a *Permanent Supportive Housing* (PSH) and/or *Rapid Rehousing Program* (RRP), as well as a household identified on the *Coordinated Entry System* list to meet the minimum requirements of the HUD Mainstream HCV Program.

### 15-XI.B. Current HCV Waiting List Applicants

KHA will identify households on the HCV waiting list and any relative Project-based Voucher (PBV) waiting lists composed of one or more persons 18 to 61 years of age with disabilities, which may include additional household members who are not non-elderly persons with disabilities. Additionally, eligible households can be referred to KHA by partner agencies within the Will-Grundy and Kendall Counties CoC and

added to the KHA HCV waiting list when open. KHA will provide a waiting list preference for these vouchers to non-elderly persons with disabilities who:

- 1. are currently homeless;
- 2. previously experienced homelessness and currently a client in a permanent supportive housing or rapid rehousing project, or;
- 3. transitioning out of institutional or other segregated settings

#### 15-XI.C. Continuum of Care Referrals

#### **PSH and RRP Clients**

The Move On Project will allow households currently in the Kendall-Grundy County PSH and/or in RRP who are ready to move on to maintain housing stability, which they achieved by intensive supportive services with a social service agency. Their housing assistance will transition over to the KHA HCV program; and still receive supportive services from a social service agency as needed.

#### **CES Clients**

Households identified on the Will-Grundy and Kendall Counties CoC Coordinated Entry System (CES) who are seeking housing assistance that meet the minimum qualifications of having an adult between 18 and 61 who is disabled in their household may also be referred for the *Move On Project*.

These households may not be receiving services from a CoC agency, but have been assessed and found eligible to be referred when KHA opens the HCV waiting list or specifically opens the HCV waiting list to accept referrals designated for the Mainstream HCV Program. Referrals from the CES will be made through the CoC of Will-Grundy and Kendall Counties' *HMIS Department* on the household's behalf.

#### 15-XI.D. CoC Referral Process

#### **PSH and RRP Referrals**

The *Move On Project* is a unique opportunity to provide current PSH and RRP clients who no longer need intensive supportive services the chance to transition to independent, affordable housing. Choosing the most appropriate and promising clients for this new opportunity will be key for the partner agencies as the expectation is that the household will prosper in the HCV Program and not return to homelessness. Therefore, the goal is to refer clients to the *Move On Project* that are highly likely to succeed in a HCV Program placement.

Ideal candidates for the *Move On Project* are those who exhibit high levels of self-sufficiency and who will be able to maintain independent housing beyond the support of social service housing support programs. Therefore, participating agencies should be very thoughtful in referring candidates that will be successful in independent housing. A thorough discussion and understanding of the applicant's ability and interest in participating in the *Move On Project* should take place prior to

## Proposed KHA Admin Plan Changes (Additions)

Presented to the KHA Board of Commissioners February 28, 2020 completing their application. Residents may decline a referral because of HCV program requirements that are inconsistent with their needs or preferences.

All Move On Project applicants must have at a minimum a household member that is between 18 and 61 who has a disability and three steps are required to complete the referral process for PSH and/or RRP participants:

- Move On Project application signed by participant and case manager;
- Review and approval by a Supervisor/Manager of Partner Agency; and
- The referral will be forwarded to KHA Compliance & QC Department for processing.

#### **CES Referrals**

The process for the referral of a household in the CoC Coordinated Entry System (CES) is:

- CoC of Will-Grundy and Kendall Counties HMIS creates a report that identifies households that have a member who is between 18 and 61 and has a disability;
   and
- Referrals are submitted by CoC of Will-Grundy and Kendall Counties HMIS staff to KHA Compliance & QC Department for processing.

#### **Referral Limits**

There is currently no limit on the number of applicants an agency can refer to the KHA HCV waiting list that has the requirements and preferences to be referred under the Mainstream HCV Program targeted sub-group.

### 15-XI.E. Pre-Application and Preferences

Once a *Move On Project* applicant has been identified, the completed referral will be submitted to KHA Compliance & QC Department for processing and adding applicant to the HCV waiting list with targeted preferences designated for the Mainstream HCV Program.

Preferences will be given for those households that are currently:

- participating in a Permanent Supportive Housing (PSH) and/or Rapid Rehousing Program (RRP) – 2 points;
- transitioning out of institutional and other segregated settings 1 point; and
- identified as Literally Homeless by a Continuum of Care Partner Agency 1 point

At that time, the applicant will be provided information on how to create an online account to complete the online pre-application and any other documents as required to be added on to the HCV waiting list.

## 15-XI.F. Intake and Program Eligibility

Move On Project applicants must meet the minimum qualifications of a HCV Program applicant as established by KHA. These qualifications require:

- total household income eligibility;
- no household member is a registered or registry-eligible sex offender (if another family member in the household not the head of household is the registered or registry-eligible sex-offender, the family may be eligible for the voucher if the family member subject to the registration requirement is removed from the household);
- all household members 18 and over must pass a criminal background check involving arrests or convictions for weapon, drug or violent criminal activity related crimes;
- applicant has not been evicted from federally-assisted housing for the manufacture, sale or delivery of methamphetamine; and
- at least one member of applicant household is an eligible citizen.

### 15-XI.G. Program Resources

Partner agencies and KHA staff are available to assist each *Move On Project* participant successfully transition into the HCV Program when selected from the KHA HCV waiting list. However, applicants must understand that KHA may not have any funds available to cover all or part of a security deposit, and does not provide funds to cover any other needs including: rental application fees, moving, utility deposits and reconnection fees or furniture assistance. If referred by a partner agency, that agency will be able to provide a referral to another partner agency within the CoC who may offer that financial assistance or a voucher to obtain household goods and/or furniture.

### **Supportive Services**

For those referred from PSH and/or RRP it is expected that the partner agency case manager attends all appointments with the applicant to ensure they understand the HCV Program and have a smooth transition. Participants can expect six months of supportive services, if needed from their PSH and/or RRH provider after they receive their voucher and have leased up in an HCV unit. Households referred to the *Move on Project* from the CES will be provided with resources within the CoC for supportive services.

KHA and the partner agencies will have a mandatory orientation for each new applicant added to the HCV waiting list through the referral process to ensure they understand the KHA HCV Program guidelines and expectations of a voucher holder.

## 15-XI.H. Vouchers and Program Units

Voucher Issuance

The Mainstream HCV will have an initial search term of up to 120 days. See [KHA Plan: 5-II.F.] for all the policies regarding initial term extension and suspension and expiration. The initial lease term for Mainstream HCV Program participants must be at least one (1) year, but as a Reasonable Accommodation the initial lease term can be less than one-year.

#### PSH and/or RRP Clients

Any applicant who currently resides in a KHA service area in a PSH and/or RRP unit will discuss with their existing landlord, the opportunity for them to become an HCV Program landlord which would allow them to remain in their existing unit. It is suggested that a case manager be involved in this conversation with the landlord to make sure they understand the HCV Program and answer any questions that may arise (i.e., lease must be in client's name and not partner agency).

### Other Applicants

Any other applicant who currently resides in a unit within the DHA service area may discuss with their existing landlord the opportunity for them to become an HCV Program landlord which would allow them to remain in their existing unit. Upon request, KHA staff may assist with explaining the HCV Program to their landlord.

### 15-XI.I. Portability of Mainstream Vouchers

The Mainstream HCV Program family cannot move with their voucher under portability provisions before the end of their initial (first) year as a program participant. However, if KHA approves a request for a Reasonable Accommodation that requires a move, the family can move under portability provisions. When any portability move is authorized by KHA, the move must be made in accordance with the Portability policies of [24 CFR 982.355], the Receiving PHA Administrative Plan and KHA's policies in [KHA Plan: Chapter 10, Moving With Continued Assistance and Portability].

## 15-XI.J. Change From Mainstream to Regular HCV

Mainstream HCV households may also be on a regular HCV tenant-based program waiting list. In the event that their waiting list position on the regular HCV tenant-based program waiting list reaches the top of the waiting list, the Mainstream HCV household will be changed to the regular HCV in the tenant-based program to make the Mainstream HCV available for another non-elderly disabled family on the DHA HCV waiting list..

Additionally, and at any time after the end of their initial (first) year as a program participant, *DHA* may offer the family a regular HCV in the tenant-based program – if available – to make the Mainstream HCV available for another non-elderly disabled family on the DHA HCV waiting list. The offer of regular HCV assistance is pending funding availability.

In either case, any Mainstream family that is offered a regular HCV will not be subject to the total household income limit requirements outlined in *DHA Plan:* Chapter 3, Program Eligibility, but all other program eligibility requirements still apply.

## 15-XI.K. Mainstream, SEMAP and VMS Reporting

Mainstream HCV's are monitored in the **Voucher Management System** (VMS) separately from all other Tenant Based vouchers and are included in the **Section Eight Management Assessment Program** (SEMAP) leasing indicator denominator because they are not dependent on referrals from the Kendall-Grundy CoC. The code for Mainstream HCV Program will be recorded in Section 2n of the *Form HUD-50058* to indicate in PIC that the family is a Mainstream HCV Program participant..