



CoC Start-Up Training Refresher

Welcome & Purpose

- **Participating Staff/CoC Portfolio (in order of presentations)**
 - Rachel W. Ingram, Sr. CPD Rep – Regions 4, 10, 11, & 14
 - Michelle Kincaid, Sr. CPD Rep – Indianapolis CoC Lead, Region 8a
 - Lori Dimick, CPD Rep – Regions 2, 2a, 3, & 6
 - Mike Cook, Financial Analyst – Region 5, 7, 8, and 9; Assist IHCD
 - Andrew Houge, Sr. CPD Rep – Regions 12 and 13; Assist Indianapolis
 - Letty Almodovar, CPD Rep – Regions 1a & 1
 - Aaron Bailey Sr. CPD Rep – Balance of State CoC Lead, IHCD
- **What this Training IS (Purpose)**
 - 2-hour Basic Review & 2 best practices
 - Common Findings
 - Field Office Trainings
- **What this Training IS NOT**
 - Comprehensive Training (like 2015 Start-up Training)
 - A planning session with exercises
 - Project or Recipient-Specific Technical Assistance
 - A discussion of Coordinated Entry, HMIS
 - 2017 Joint components (TH-RRH) projects
 - VAWA (Violence Against Women Act)

Topics

- Program Components & Eligible Costs – Rachel W. Ingram
- Housing Assistance Requirements with Match Best Practice – Lori Dimick
- Eligibility Documentation – Michelle Kincaid
- Uniform Administrative Standards with Best Practice – Mike Cook
- Property Requirements – Andrew Houge
- Grant Administration – Letty Almodovar
- Other Requirements and Common Findings – Aaron Bailey
- Future Trainings
 - APR Overview & Closeout, Chronic Homelessness
 - Financial Management
 - Impact of Opioid Crisis
 - Environmental Review
- Questions & Resources

Rachel W. Ingram

- Program Components & Eligible Costs
 - Leases
 - Restrictions on Combining Funds
 - Limitation on Use of Funds

Program Components – PH PSH & RRH

- Permanent Supportive Housing (PSH) and Rapid Re-Housing (RRH)
- Participant must be on a lease/sublease for a term of at least one year
 - The lease/sublease must be renewable for terms that are a minimum of one month
 - Terminated only for cause
- PSH – Long-term (24+months) housing assistance
 - Supportive services to assist persons with a disability
 - Assistance to households in which one adult or child has a disability
 - New and Reallocated PSH projects must house CH individuals and/or families
- RRH - Short-term (1-3 months) or medium-term (4-24 months) housing assistance
 - RA for a household is limited to no more than 24 months
 - Supportive services to assist persons obtain/maintain housing stability
 - Program participants meet with a case manager once per month
- RRH projects must follow CoC written policies for determining and prioritizing participants
 - Max RA amount or percentage a participant may receive
 - Max number of months or number of times a participant may receive RA
 - Participant rent share

Program Component – TH

- Transitional Housing (TH) – Facilitates movement to PH within 24 months
 - Participants must have a lease, sublease, or occupancy agreement for a term of at least one month, that ends in 24 months
 - A homeless individual or family may remain in TH for a period longer than 24 months, if PH has not been located.
 - HUD may discontinue assistance for a TH project if more than half of the households remain in that project longer than 24 months.
 - Rents and occupancy charges may be reserved to assist participants move to PH.

Program Components

SSO and HMIS

- Supportive Service Only (SSO)
 - Funds used for eligible supportive services to unsheltered/sheltered persons for whom the recipient or subrecipient is not providing housing or housing assistance
 - Includes street outreach
 - Under reallocation, CoCs could create a new SSO project for coordinated entry/centralized assessment
- Homeless Management Information System
 - Funds to support costs to manage and operate CoCs HMIS - HMIS Leads only
 - Recipients can request an HMIS budget line item for client data entry costs, but cannot apply for funding under the component

Eligible Costs by Component

Eligible Costs	Program Components				
	PSH	RRH	TH	SSO	HMIS
Acquisition	X		X	X	
Rehabilitation	X		X	X	
New Construction	X		X		
Leasing	X		X	X	
Rental Assistance	X	X	X		
Supportive Services	X	X	X	X	
Operating Costs	X		X		
HMIS	X	X	X	X	X
Project Administration	X	X	X	X	X

Eligible Leasing Costs

- Pays for rent on structures or units to provide supportive housing or services
- May be used to pay 100% of leasing costs of an unit or structure(s)
- May not be used to lease units/structures owned by the recipient, subrecipient, or any related organization; HUD has the authority grant an exception for good cause
- Must be reasonable in relation to rents charged for comparable type, size, locations, etc.
- May not exceed rents charged for comparable units and the rent paid may not exceed HUD FMR
- Utilities. Electricity, gas, and water if included in the rent. Utility costs not landlord-provided are operating costs, except for supportive service facilities.
- Security deposits and first and last month's rent.

Leasing Review

Eligible for these CoC components	Transitional housing (TH) Permanent supportive housing (PSH) Supportive Services Only (SSO)
Model of assistance	Leasing structures, portions of buildings, individual units
Length of assistance	TH: Up to 24 months; PSH: +24 mos; no maximum
Who leases the units	Lease between recipient/subrecipient and property owner; sublease or occupancy agreement with program participant
Unit rent	May not exceed Rent Reasonableness amount or FMR; whichever is lowest
Vacancy payment Security deposits	No, but can pay rent until new participant moves in Up to equivalent of 2 months of rent
Last month's rent	Up to equivalent of 1 month of rent; advanced payment allowed
Property damage	No

Eligible Rental Assistance

- Pays for part of the rent for a unit in which a homeless person will reside
- May be short(<3 months), medium (4-24 months), or long (+24 months.) term assistance
- Assistance may be tenant-based (TBRA), project-based (PBRA), or sponsor-based (SBRA)
- Administrative Costs
 - Processing rental payments to landlords
 - Examining participant income and family composition
 - Providing housing info and assistance
 - Inspecting units for compliance with housing quality standards
 - Receiving new participants into the program

Rental Assistance Review

Length of Assistance
Eligible for these CoC Components

Short-term: Up to 3 months = RRH & TH
Medium-term: 4-24 months = RRH & TH
Long-term: +24 months = PSH Only

Model of assistance
Who leases the units
RA after move-out

TBRA: RA follows the participant

- Participant locates housing of their choice
- If participant moves, they take RA to a new unit
- Owner agrees to lease to participant

SBRA: RA stays with the sponsor/unit

- Recipient contracts with Sponsor who locates and rents units
- Sublease between participant and recipient & lease between recipient and owner
- If participant moves, sponsor can sublease unit to another eligible participant

PBRA: RA stays with unit

- Recipient contracts with owner
- Owner agrees to lease to participant
- If participant moves, unit is rented to new eligible participant

Rental Assistance Review

Unit rent	<ul style="list-style-type: none">• Awarded at FMR; Capped at Rent Reasonableness
Vacancy payment	<ul style="list-style-type: none">• Yes. May pay rent for a maximum of 30 days from the end of the month in which the unit was vacated
Security deposits	<ul style="list-style-type: none">• Up to equivalent of 2 months rent
Last month's rent	<ul style="list-style-type: none">• Up to equivalent of 1 month rent; advanced payment allowed
Property Damage	<ul style="list-style-type: none">• Up to equivalent of 1 month of rent to pay for any damage

Eligible Supportive Services

- In general, grant funds may be used only on those services listed in the CoC Program Interim Rule:

Assessing service needs	Legal services
Moving Costs	Life skills training
Case management	Mental health services
Child care	Outpatient health services
Education services	Outreach services
Employment assistance & job training	Substance abuse treatment services
Food (no longer an eligible operating cost)	Transportation
Housing search & counseling services	Utility deposits

Eligible Operating Costs

- Costs associated with the day-to-day physical operation of housing in which homeless persons are housed
- Grant funds used for
 - Maintenance and repair of housing
 - Building security
 - Electricity, gas, & water not provided by the landlord
 - Furniture
 - Equipment
 - Staff and overhead costs related to carry out these activities
- Funds may not fund
 - Emergency shelter or SSO facilities
 - Maintenance and repair costs that are included in the lease

Eligible Costs – Project Administration

- Funds can be used to conduct:
 - General management, oversight and coordination
 - Training on CoC requirements
 - Environmental Reviews
- Recipients are required to share at least 50% of project administrative funds with subrecipients
- Costs of carrying out other eligible activities should be charged to those budget line items, NOT project administrative

Restrictions on Combining Funds

Combination(s)

- Rehab, Acquisition, New Construction + Leasing, Tenant Based Rental Assistance (TBRA), or Short-Med-Term Rental Assistance
- Rental Assistance + Leasing or Operating

Allowed

- NO

- NO

Limitation on Use of Funds

- No assistance may be used to replace state or local funds previously designated to assist homeless persons
- The Federal, state, or local government receiving funds cannot discriminate against an organization on the basis of religious affiliation.
- Recipients and subrecipients may NOT charge program participants program fees.

Michelle Kincaid

- Eligibility Documentation
 - Homeless Definitions
 - Intake Policies
 - Disability & Chronic Homelessness
 - Income Determination

Homeless Definitions

Category 1: Literally Homeless

Category 2: Imminent Risk of Homelessness

Category 3: Homeless Under other Federal Statutes*

Category 4: Fleeing/Attempting to Flee Domestic Violence

*Requires HUD Approval – None for Indiana Field Office

Will not be covered in detail

Homeless Definition – Category 1

- Literally Homeless – lacks fixed, regular, and adequate nighttime residence
 - Sleeping in a place not meant for human habitation
 - Living in a shelter designated to be temporary
 - Exiting an institution (e.g., jail, hospital) where residency is for 90 days or less and were residing in emergency shelter or place not meant for human habitation immediately before entering institution

Homeless Definition – Category 2

- Imminent Risk – imminently lose their primary nighttime residence within 14 days AND
- Have no subsequent residence identified AND
- Lack the resources or support networks needed to obtain other PH
 - Primary nighttime residences include housing the individual/family owns, rents, or shares with others and rooms in hotels/motels that are paid for by the individual/family seeking assistance
 - Persons who will be exiting institutions in the next 14 days are not defined as homeless under Category 2
 - Eligible for TH and SSO

Homeless Definition – Category 4

- Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions related to violence, who
 - Have no identified subsequent residence AND
 - Lack the resources and support networks needed to obtain other permanent housing

Documenting Homelessness

- Must have written policies and procedures
 - Document eligibility at intake/screening
 - Specify the evidence to verify homeless status
 - Include standards for documenting due diligence
- Standards must be consistent with recordkeeping requirements and reflect HUDs' preferred order

Documenting Homelessness

- In order of preference
 - Third-party documentation
 - Intake worker observations
 - Certification from the person seeking assistance
- Appropriate documentation will vary on:
 - Type of assistance
 - Circumstances of potential participant
 - Available documentation
 - HMIS
 - Discharge documentation

Intake Policies

- As part of intake, Recipients must:
 - Participate in the CoC's coordinated assessment
 - Follow the CoC's written standards for assistance administration
 - Have and follow their own policies and procedures assistance administration

Disability Definition

- Disability is defined as having one or more of:
 - Physical, mental or emotional impairment
 - Development disability
 - HIV/AIDS
- After initial intake and disability documentation is obtained, this status is not recertified

Disability Documentation

- PSH projects accept homeless persons with a qualifying disability, documented by:
 - A professional licensed by the state of Indiana to diagnose and treat that condition **OR**
 - Social Security Administration (SSA) for persons receiving disability benefits
 - VA Disability check statement
 - SSI/SSDI check

Chronic Homeless Status

- Prioritizes people with longest homelessness histories and most severe needs
- Final Definition
 - 1) Homeless definition with a disability who
 - Lives in place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Had been homeless continuously for at least 12 months or on at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
 - Occasions separated by a break of at least seven nights
 - Stays in institution of fewer than 90 days do not constitute a break

Chronic Homeless Status

- 2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all the criteria in paragraph (1) of this definition, before entering that facility; or
- 3) Family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while head of household has been homeless



Lori Dimick

- Housing Assistance Requirements
 - FMR & Rent Reasonableness
 - Rental Assistance & Leasing Rent Limits
 - Match & Best Practice (In-kind Tracking)
 - Occupancy and Rent Charges



Housing Assistance Requirements

- Fair Market Rent (FMR)
 - Applies to Leasing and Rental Assistance Projects
 - Updated each fiscal year; available at huduser.gov
- Rent Reasonableness
 - Ensures CoC participants do not pay more than non-program renters
 - Must be reviewed and documented annually, even if participant has not moved
 - Does not have to be documented for projects not receiving leasing or rental assistance
 - Test must be completed prior to lease signing
 - Appropriate documentation must be maintained annually
 - IN-502 BOS – all recipients and subrecipients (under IHEDA) should utilize GoSection 8 Software. It will complete a rent reasonable test and print out the page and place in file or upload in HMIS.

Rental Assistance Rent Limits

- Unit rents can exceed FMR but must meet rent reasonableness
- FMR and Rent Reasonableness Scenarios

	1 – BR Unit	2- BR Unit	3 – BR Unit
Reasonable Rent	\$750	\$1,200	\$1,900
FMR	\$650	\$1,300	\$1,900
Allowable Rent	\$750	\$1,200	\$1,900

Leasing Rent Limits for Units

- Unit rents cannot exceed Rent Reasonableness
- CoC leasing funds cannot pay above FMR
- Recipient/Subrecipient can use non-CoC funds to pay for housing costs above the FMR
- FMR and Rent Reasonableness Scenarios

	1 – BR Unit	2- BR Unit	3 – BR Unit
Reasonable Rent	\$750	\$1,200	\$1,900
FMR	\$650	\$1,300	\$1,900
Allowable Rent	\$650	\$1,200	\$1,900

FMR – Leasing & Rental Assistance

- FMR and Leasing
 - Leasing projects cannot use CoC funds to pay above FMR
 - If rent reasonableness is above FMR, non-leasing funds may be used to pay difference
 - Operating funds for utilities only
 - Program income, match, or leverage
- FMR and Rental Assistance
 - RA projects can use CoC funds above FMR
 - As long as the rent does not exceed rent reasonableness



Understanding Match

- Must be cash or in-kind contributions
- Covers eligible project costs
- Costs incurred by partner organization to provide “in-kind” services must be documented by an MOU executed prior to grant agreement
- Program income can be used as match



What is Not Match?

- Cash or any in-kind contribution used as match for another grant
- Cash or in-kind contributions statutorily prohibited as match or ineligible under the CoC Program
- In-kind services provided without an MOU
- Program Participant Savings
 - Savings belong to the program participant, not the recipient or subrecipient



Match Requirements

- Must be able to document all costs
- 25% cash or in-kind for all line items except leasing
- Match is provided to the CoC program grant – not to a specific budget line item
- Matching funds can only be used on eligible CoC program costs. Eligible? Costs that could be reimbursed by grant. Incurred within grant period



Match Example

Without Leasing Funds

Supportive Services	\$15,000
Rental Assistance	\$25,000
Project Admin (10%)	\$4,000
Grant Total	\$44,000
Required Match	\$11,000
(25% of \$44,000)	

With Leasing Funds

Supportive Services	\$15,000
Leasing	\$25,000
Project Admin (10%)	\$4,000
Subtotal w/o Leasing	\$19,000
Required Match	\$4,750
(25% of \$19,000)	

Cash Match Documentation

- Cash match must be supported with written documentation on source organization's letterhead, signed, and dated by an authorized representative
- Documentation must include
 - Amount of cash to be provided to the project
 - Specific date cash will be made available
 - Specific grant number & fiscal year to which cash match will be contributed
 - List allowable activities to be funded by the cash match

In-kind Goods Match Documentation

- In-kind donations must be supported with written documentation provided on the source organizations letterhead, signed, and dated by an authorized representative.
- Documentation must include:
 - Description and value of the donated goods
 - Specific date and grant (including fiscal year) for which the goods will be contributed
 - Method used to determine the value of the donation
 - Utilize sites such as Goodwill, Salvation Army, Tax sites – can provide a link to determine value of goods. Needs to be consistent.



In-kind Services Match Documentation

- An MOU for in-kind services must be in place prior to provision of the service.
- The MOU must:
 - Provide an unconditional commitment to provide the service
 - Describe the specific service to be provided
 - Indicate the profession of persons providing the service and hourly cost of the service
 - The timeframe in which services will be provided
 - The system that will be used to document the actual level and value of services as provided



Tracking Match

Documentation needs to show match being tracked - financial office or case manager:

- Track match within the program year, grant number and CFDA
- Track match of when it was received and when it was spent on eligible expenses (within grant period).
- Match dollar amount in APR should match the financial tracking. Over match in financial tracking. If meet match within 3 months, then no need to go further.
- MOU for services. Recipients need to receive verification services were completed. Monthly reports from Service Provider – provide a form for them to complete.

Occupancy Charges

- Leasing recipients are not required to charge program participants.
- Must treat all participants the same
- May choose to impose occupancy charge equal to no more than highest of:
 - 30% of family's month's adjusted income
 - 10% of family's monthly gross income or
 - Portion of family's welfare assistance, if any, designated for paying rent
- Income calculation must be done according to 24 CFR 578.77, 24 CFR 5.609 and 24 CFR 5.611(a)
 - HUD-recommended Income Calculation Worksheet

Rental Assistance – Participation Rent

- RA participants are required to pay rent (except when receiving RRH assistance)
- Rent must be charged and be equal to the highest of:
 - 30% of family's month's adjusted income
 - 10% of family's monthly gross income or
 - Portion of family's welfare assistance, if any designated for paying rent
- Program Fees
 - Recipients and subrecipient are not allowed to charge program fees

Mike Cook

- Uniform Administrative Standards
 - Best Practice: Single Audit Tracking

Uniform Administrative Requirements

- 2 CFR Part 200 applies to the CoC Program
- Single Audit requirements at 2 CFR 200 Subpart F
- Single Audit required for recipients/subrecipients expending \$750,000 or more in Federal Funds during their fiscal year.
 - CPD sends out an annual recipient self-certification form (see example)
 - Single Audit is due in the Federal Audit Clearinghouse within nine months of end of recipient's or subrecipient's program year or within 30-days of completion of audit, whichever occurs first.
 - Federal Audit Clearinghouse (FACH) at <https://harvester.census.gov/facweb/>
- If procuring an auditor, this must be done following the procurement standards found in 2 CFR 200.317-326.

HUD Single Audit Tracking

- HUD's role in complying with Single Audit Requirements
 - Track and review Single Audits for grantees that meet the audit threshold.
- Search the Federal Audit Clearinghouse (FACH) to determine if there are any findings on recipients. For HUD-related audit findings, HUD must issue a management decision.
- Maintain audit spreadsheet with FACH submission dates and stages of the audit management decision process.

Subrecipient Audit Tracking

- Recipients must:
 - Inform subrecipients of audit requirements at time of award.
 - Verify subrecipients are audited if they meet the criteria. Check the Federal Audit Clearinghouse.
 - Ensure subrecipients take timely and appropriate action on all deficiencies.
 - Issue a management decision letter detailing corrective action and a decision letter regarding the results of the subrecipients actions.
- HUD recommends the use of a tracking tool to ensure audit compliance (Example - Page 1 of HUD tracking tool)

Single Audit Self-Certification Form

Example Recipient/Subrecipient Self-certification Form

SUBRECIPIENT CERTIFICATION OF FEDERAL FUNDS EXPENDED DURING THE REPORT PERIOD

Organization Fiscal Year Ending Date: _____

Organization Name: _____

<u>FEDERAL AGENCY</u>	<u>AMOUNT EXPENDED</u>
_____	_____
_____	_____
_____	_____

TOTAL FEDERAL EXPENDITURES DURING YOUR FISCAL YEAR: \$ _____

2 CFR Part 200 requires a single audit when entities expend \$750,000 or more in federal funds. Based on your federal expenditures are you required to have a single audit?
_____ Yes
_____ No

IF YES ABOVE, DATE AUDIT WILL BE SUBMITTED TO FEDERAL CLEARINGHOUSE: _____

NAME OF AUDIT FIRM: _____

(AUTHORIZING OFFICIAL SIGNATURE)

(CONTACT PERSON FOR QUESTIONS)

(TITLE AND DATE)

(PHONE NUMBER)

Andrew Houge

- Property Requirements
 - Lead-Based Paint
 - Housing Quality Standards
 - Environmental Review

Lead-Based Paint

- 24 CFR 982.401

Rehabilitation:

**24 CFR Part 35
Subparts A, B, J, & R**

**Project or Sponsor
Based Rental
Assistance:**

**24 CFR Part 35
Subparts A, B, H & R**

**Acquisition, Leasing,
Services, or Operating
Costs:**

**24 CFR Part 35
Subparts A, B, K, & R**

Housing Quality Standards

- Housing units assisted with leasing and rental assistance must meet HQS
- Housing units assisted with operating costs (without leasing and rental assistance) should also meet HQS as verified by HUD HQ
- Each unit must be physically inspected
- Owner has 30 days to correct any deficiencies
- Inspect units at least annually
- HQS inspector do not need to be certified
- Properties must also meet state and local codes

Environmental Review

- All new and renewal projects receiving Federal funds (including all CoC Program activities) require an environmental review
- ERs must be conducted BEFORE funds are committed
- ERs must be completed by a Responsible Entity (RE) under 24 CFR 58
 - Part 58 - Only a unit of general local government may act as a RE
 - Not-for-profits recipients should work with State and local government to coordinate the ER process
 - In very limited circumstances, HUD may perform ERs for CoC projects pursuant to 24 CFR 50 if (1) a not-for-profit is the recipient and (2) no responsible entity can be found

Environmental Review

- Tenant-based leasing projects are not subject to Section 58.5
- SBRA and PBRA and project-based leasing are classified as categorically excluded subject to 24 CFR 58.5 (CEST) and require a higher level of review than TBRA – called a “limited scope”
- ER Flow Chart can be founds at <https://www.hudexchange.info/resources/documents/CoC-Program-Environmental-Review-Flow-Chart.pdf>
- ER Levels
 - Only one Exempt/CENST form per project
 - CEST Limited Scope
 - EA (Environmental Assessment)

Letty Almodovar

- Grant Administration
 - Project Changes
 - Significant Changes
 - Amendments & Minor Changes
 - Timeliness & Recordkeeping Standards

Significant Change

- For CoCs with more than one recipient:
 - Change of recipient
 - A shift of over 10% of the total amount awarded for one eligible activity to another activity
 - A reduction in the number of units
 - A change in the subpopulation served
 - Change of project site
 - Additions or deletions in the types of eligible activities approved
- For CoCs with only one recipient
 - Change of recipient
 - A shift of over 10% of the total amount awarded for one eligible activity to another activity
 - Permanent change in the subpopulation served
 - Permanent reduction in the total number of units

Amendment Request & Minor Changes

- For significant changes, recipient should:
 - Prepare a written request to the local CPD FO
 - Explain the reason for the change
 - Justify same or improved level of service will be provided
 - Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)
- Minor Changes
 - Notify the Field Office of the change
 - LOCCS and other reporting systems can be adjusted
 - Maintain documentation and make it available to HUD during monitoring and compliance reviews or upon request

Timeliness Standards

- Recipients must promptly initiate approved CoC projects
 - Activities that are dependent on the construction must begin within 3 months of construction completion
- Once activities begin, recipient must draw down funds at least once per quarter
- Recipient must distribute funds to subrecipients within 45 days of receiving an approvable request
- Operating start date sets the 12-month PY
 - New projects start the 1st day of the month the recipient incurs eligible costs
 - Renewal grants start the day after the previous grant term

Recordkeeping Requirements

CoC Records	Homelessness Status	At Risk of Homelessness Status	Records of Reasonable Belief of Imminent Threat of Harm
Annual Income	Program Participant Records	Housing Standards	Services Provided
Match	Conflicts of Interest	Homeless Participation	Faith-Based Activities
Affirmatively Further Fair Housing	Other Federal Requirements	Subrecipient and Contractors	UFA Records

Recordkeeping Requirements

- Obtain documentation from qualified source(s) in accordance with the requirements of the Interim Rule
- Maintain the records in organization, projects, and participant files
- Confidentiality
 - All records containing protected information must be kept secure and confidential
 - The address or location of any program participant must not be made public
- Records Retention
 - All non-construction records must be retained for at least 5 years
 - Participant eligibility documentation must be retained for 5 years after final expenditure of relevant grant

Aaron Bailey

- Other Requirements
 - Conflicts of Interest
 - Participation of Homelessness Individuals
- Monitoring and Compliance
 - Common Findings

Other Requirements

- Procurement
 - Must comply with codes of conduct and conflict of interest requirements at **2 CFR 200.318**
 - CoC Board Members
 - Cannot influence decisions regarding award of grants
- Organizational conflict
 - Recipient/subrecipient is unable to render impartial assistance in the provision of any type or amount of assistance
 - Objectivity in performing work might be otherwise impaired
- Other conflicts
 - No covered person, may obtain a financial interest or benefit from an assisted activity

Other Requirements

- Participation of Homeless Individuals
 - Recipient and subrecipients must document its compliance with the homeless participation requirement (24 CFR 578.75(g))
 - Must provide for the participation of not less than one homeless or formerly homeless individual on the agency board or equivalent policymaking entity
 - Must involve homeless individuals and families in the creation and operation of the project

Other Requirements

Displacement, Relocation, and Acquisition	Fair Housing and Equal Opportunity	Solid Waste Disposal
Section 3	Transparency Act Reporting	Equal Access Rule

Monitoring

- To determine that grant activities are implemented and administered in compliance with:
 - CoC Program Interim Rule
 - NOFA
 - Grant Agreement
 - Uniform Administrative Requirements
 - Other Programmatic Guidance
- Recipients and subrecipient should monitor themselves at least annually
- Review can be remote or on-site
 - Must comply with recipient and subrecipient policies & procedures

Common Findings

- 2018 – 7 CoC Monitoring Reviews
- 49 CoC Findings
 - 6 Client-related Findings
 - 11 Financial Management Findings
 - 7 Lead-based Paint Findings
 - 17 Overall Management Findings
 - 2 Match Findings
 - 6 PSH Findings

Common Findings

- Client-Related Common Finding
 - Intake Procedures - Order of Priority
 - Records demonstrated insufficient written intake procedures excluding evidence of homelessness: (1) third-party documentation; (2) intake worker observations; and (3) self-certification.
- Financial Management Common Findings
 - Financial Identification of the CoC Program
 - Records did not identify CoC program and grant(s) received and expended by specifying the Catalog of Federal Domestic Assistance (CFDA) title and number, HUD award identification grant number and year
 - In-kind Match
 - Records did not include sufficient documentation, including procedure for calculating the value of the donated item value on the donated items.
 - Records did not adequately track the receipt of in-kind match donations
- Lead-Based Paint Common Findings
 - Lead Hazard Information was not distributed to participants based on file reviews
 - Lead visual assessments were not done, adequately completed, or correctly recorded in the HQS inspections
 - Lead visual inspections completed by staff that had not completed the HUD Lead training

Common Findings

- Overall Management Common Findings
 - Operating Manual
 - Recipients have not established and maintained standard CoC operating procedures
 - HQS Inspections
 - HQS inspections not completed at all or untimely
 - HQS inspection resulted in deficiencies not addressed by recipient
 - Timeliness Standards
 - APR submitted after due date
 - LOCCS drawdowns were not done quarterly
- PSH Common Findings
 - Occupancy Agreements and Leases
 - Signed agreements were executed for only six months instead of the required minimum one year
 - Leases were not signed by all parties as reviewed in participant files
 - Rent Reasonableness
 - Rent reasonableness documentation was incomplete at review or not documented annually

Resources

- [CoC Program Laws, Regulations, and Notices](#)
 - [CoC Interim Rule - Updated Version](#) (includes VAWA and Mobility Options)
 - [CoC Program Interim Rule Amendment to § 578.51\(c\): Increasing Mobility Options for Homeless Individuals and Families With Tenant-Based Rental Assistance](#)
 - [Defining Homeless Final Rule](#)
- [CoC Program Toolkit](#): CoC Program Intro, CoC Responsibilities & Duties, Documenting Homelessness, Program Components & Eligible Costs, Grant Administration, and Program Application & Reporting Systems
- [CoC Program Eligibility Requirements](#)
- [Coordinated Entry](#)
- [Importance of Documenting Match Under the CoC Program Podcast](#)
- FY2015 CoC Start Up Training (to be emailed after training)

Resources

- [Chronic Homelessness](#)
 - [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining "Chronically Homeless" Final Rule](#)
 - [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness in PSH and Recordkeeping Requirements for Documenting CH Status](#)
- [CoC Program Leasing and Rental Assistance Projects: Examples of Lease Agreements](#)
- [2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
 - [2 CFR Part 200 Overview for Grantees](#)
 - [Federal Audit Clearinghouse \(FACH\)](#)
- [Environmental Review Training and Resources](#)
 - [Environmental Reviews for Continuum of Care Grantees](#) (Dec 2017)
 - [CoC Program Environmental Review Flow Chart](#)
 - [Environmental Review Frequently Asked Questions \(FAQs\)](#)

Resources

- [HUD Paint Visual Assessment Training Course](#)
- [CoC Program FAQs](#)
- [Ask A Question \(AAQ\) - CoC Program on HUD Exchange](#)
- [Join a Mailing List on HUD Exchange](#)
- [Housing First in Permanent Supportive Housing Brief](#)