



Continuum of Care Program

**Start-Up Conference
FY2012 Grants**





Workshop Facilitators

- Facilitator Name, Organization
- Facilitator Name, Organization

Participant Introductions



Materials and Logistics

- Training materials
- Facilities
- Cell phones off
- Be respectful when others are talking
- Lunch and Breaks



Overall Objective

Recipients and subrecipients will be able to understand the CoC Program interim rule requirements and responsibilities related to the project operation and grant administration



PROGRAM COMPONENTS



Program Components

- Permanent Housing (PH)
 - Permanent Supportive Housing (PSH)
 - Rapid Re-housing (RRH)
- Transitional Housing (TH)
- Supportive Services Only (SSO)
- HMIS
- Homelessness Prevention



Program Components

- Permanent Housing – Permanent Supportive Housing
 - Long-term housing assistance where supportive services are provided to assist homeless persons with a disability to live independently.
 - Assistance can **only** be provided to individuals with disabilities and families in which one adult **or** child has a disability.



Program Components

- Permanent Housing – Rapid Re-housing
 - Short- or medium-term housing assistance and supportive services are provided to assist homeless persons obtain and maintain stability in permanent housing.
 - Rental assistance for a household is limited to no more than 24 months.



PROGRAM COMPONENTS

- **Transitional Housing:** Facilitates the movement of homeless individuals and families to permanent housing within 24 months.
- **Supportive Services Only:** Is used to pay for eligible costs of supportive services to unsheltered and sheltered persons for whom the recipient or subrecipient is not providing housing or housing assistance.



Program Components

- HMIS – This is intended for HMIS Leads and allows HMIS Leads to manage and operate a CoC's HMIS.
 - Please note: All other components can request an HMIS budget line item for costs of contributing to the HMIS.



PARTICIPANT ELIGIBILITY



Overview of Homeless Definition

- 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



Literally Homeless

- An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
- Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, including
 - car
 - park
 - abandoned building
 - bus or train station
 - airport
 - camping ground



Literally Homeless (cont.)

- Living in a shelter designated to provide temporary living arrangements, including
 - Congregate shelters
 - Transitional housing
 - Safe havens
 - Hotels and motels paid for by charitable organizations or federal/state/local government programs
- **Exiting an institution (e.g., jail, hospital)**
 - where they resided for 90 days or less
 - AND
 - were residing in emergency shelter or place not meant for human habitation immediately before entering institution



Imminent Risk

- Individuals/families who will 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 permanent housing

*Primary nighttime residences include:

- Housing the individual/family owns
- Housing the individual/family rents
- Housing the individual/family shares with others without paying rent
- Rooms in hotels/motels that are paid for by the individual/family seeking assistance



Homeless Under Other Federal Programs

- Unaccompanied youth under 25 or families with children and youth who do not otherwise qualify as homeless, but who:

Meet homeless definition under another federal statute

AND

Have not had lease, ownership interest, or occupancy agreement in permanent housing any time during last 60 days

AND

Have experienced two or more moves during last 60 days

AND



Homeless Under other Federal Programs

- Can be expected to continue in such status for an extended period of time because of
 - Chronic disabilities
 - OR
 - Chronic physical health or mental health conditions
 - OR
 - Histories of domestic violence or childhood abuse (including neglect)
 - OR
 - Presence of a child or youth with a disability
 - OR
 - Two or more barriers to employment



Fleeing/Attempting to Flee DV

- 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

Written policies and procedures must:

- Require intake staff to document
 - At intake/screening for eligibility
 - For ALL persons seeking assistance
 - Evidence relied upon to establish and verify homeless status
- Include standards for documenting due diligence

*Standards must be consistent with recordkeeping requirements and reflect HUD's preferred order



Documenting Homelessness

- In order of preference
 1. third-party documentation
 2. intake worker observations
 3. certification from the person seeking assistance
- Appropriate documentation will vary depending on
 - Type of assistance provided
 - Circumstances of the potential program participant, including individuals fleeing/attempting to flee domestic violence
 - Already available documentation
 - Discharge paperwork
 - HMIS service transactions



Policies for Intake

Remember...

Recipients must participate in the CoC's coordinated assessment as a part of intake.

Recipients must follow the CoC's written standards for administering assistance.

Recipients must have their own policies and procedures for administering assistance.



Termination of Assistance

- The recipient or subrecipient may terminate assistance to a program participant who violated program requirements or conditions of occupancy
- Must provide a formal process:
 - Written copy of program rules
 - Written notice of reason for termination
 - Review of the decision
 - Written notice of the final decision



DEFINITION OF DISABILITY



Definition of Disability

- Physical, mental or emotional impairment
- Developmental Disability
- HIV/AIDS



Physical, Mental or Emotional Impairment

- Impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that
 - Is expected to be long-continuing or of indefinite duration
- AND**
- Substantially impedes the person's ability to live independently
- AND**
- Could be improved by more suitable housing



Developmental Disability

- Defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000 (42 USC 15002)
- Means a severe, chronic disability that
 - Is attributable to a mental or physical impairment or combination
 - AND**
 - Is manifested before age 22
 - AND**
 - Is likely to continue indefinitely
 - AND**



Developmental Disability (continued)

- Results in substantial limitations in three or more major life activities
 - Self-care
 - Receptive and expressive language
 - Learning
 - Mobility
 - Self-direction
 - Capacity for independent living
 - Economic self-sufficiency

AND



Developmental Disability (continued)

- Reflects need for
 - A combination and sequence of special, interdisciplinary or generic services
- OR**
- Individualized supports
- OR**
- Other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated



Developmental Disability (continued)

- An individual may be considered to have a developmental disability without meeting 3 or more of the criteria listed previously, if
 - Individual is 9 years old or younger

AND

 - Has a substantial developmental delay or specific congenital or acquired condition
- AND**
- Without services and supports, has a high probability of meeting those criteria later in life



HIV/AIDS Criteria

- Includes the disease of acquired immunodeficiency syndrome (AIDS)

OR

- Any conditions arising from the etiologic agent for AIDS including infection with HIV



Documenting Disability

Demonstrating eligibility for permanent housing

- May only accept homeless persons with qualifying disability
 - Verification from a professional who is licensed by the state to diagnose and treat that condition
- OR
- Social Security Administration (SSA) can verify for persons receiving disability benefits
 - VA Disability check
 - SSDI check
- Verification must state that the disability
 - Is expected to be long-continuing or of indefinite duration
 - Substantially impedes the individual's ability to live independently
 - Could be improved by the provision of more suitable housing conditions



CHRONICALLY HOMELESS



Who is Chronically Homeless?

- An individual who:
 - Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
 - Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.



Who is Chronically Homeless?

- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of chronically homeless; or
- A 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 paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.



Permanent Housing Bonus

- Serve chronically homeless individuals and families (with priority on serving those with the longest histories of homelessness)
- No more than 20% of CoC Program grant funds may be used for case management. The remaining 80% may be used for eligible housing costs.



Permanent Housing Bonus

- Projects **exclusively** serving chronically homeless individuals and families must ensure that all participants meet the eligibility requirements as defined by HUD.
- Participants must come directly from
 - the streets
 - other places not meant for human habitation
 - emergency shelters
 - safe haven programs



ELIGIBLE COSTS AND MATCH



Eligible Costs

- Acquisition/Rehabilitation/New Construction
- Leasing
- Rental Assistance
- Supportive Services
- Operating Costs
- HMIS
- Project Administration Costs



Eligible Costs

Eligible Costs	Program Components				
	Permanent Housing		TH	SSO	HMIS
	PH: PSH	PH: RRH			
Acquisition	✓		✓	✓	
Rehabilitation	✓		✓	✓	
New construction	✓		✓		
Leasing	✓		✓	✓	
Rental assistance	✓	✓	✓		
Supportive services	✓	✓	✓	✓	
Operating costs	✓		✓		
HMIS	✓	✓	✓	✓	✓
Project Administration	✓	✓	✓	✓	✓

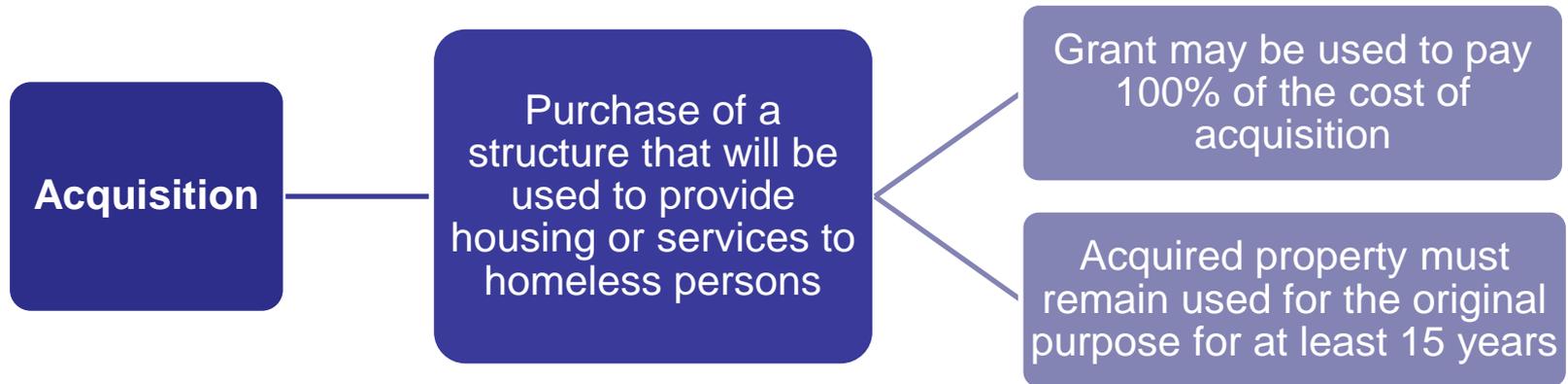


Eligible vs. Approved Costs

Eligible	Approved
<p>All costs included in the CoC Program interim rule</p>	<ul style="list-style-type: none">• Each project has approved budget line items
	<ul style="list-style-type: none">• Recipients may only spend CoC Program funds on approved costs
	<ul style="list-style-type: none">• HUD approval is required to amend the budget to spend money on CoC Program eligible costs other than those that were included in the project budget approved through the application process



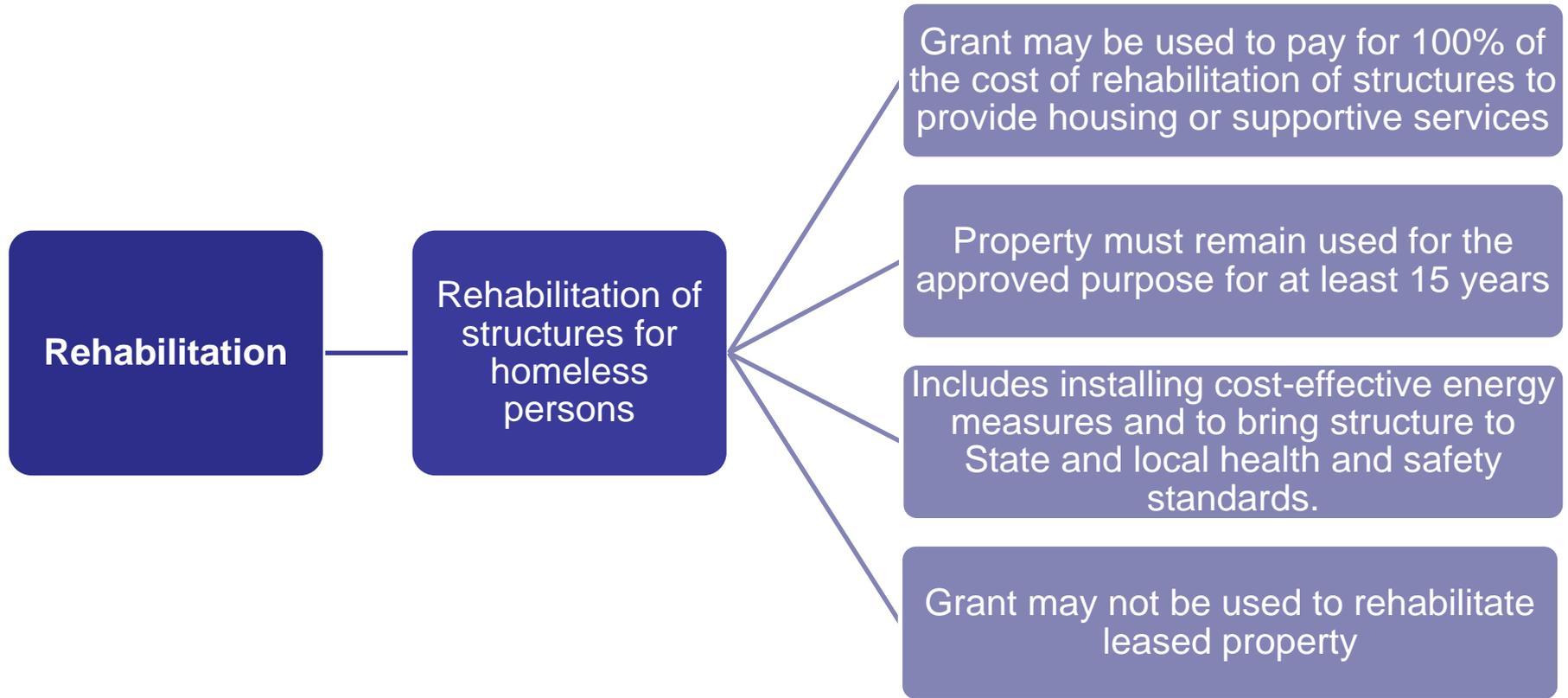
Eligible Costs – Acquisition



Eligible Cost under PH: PSH, TH, or SSO



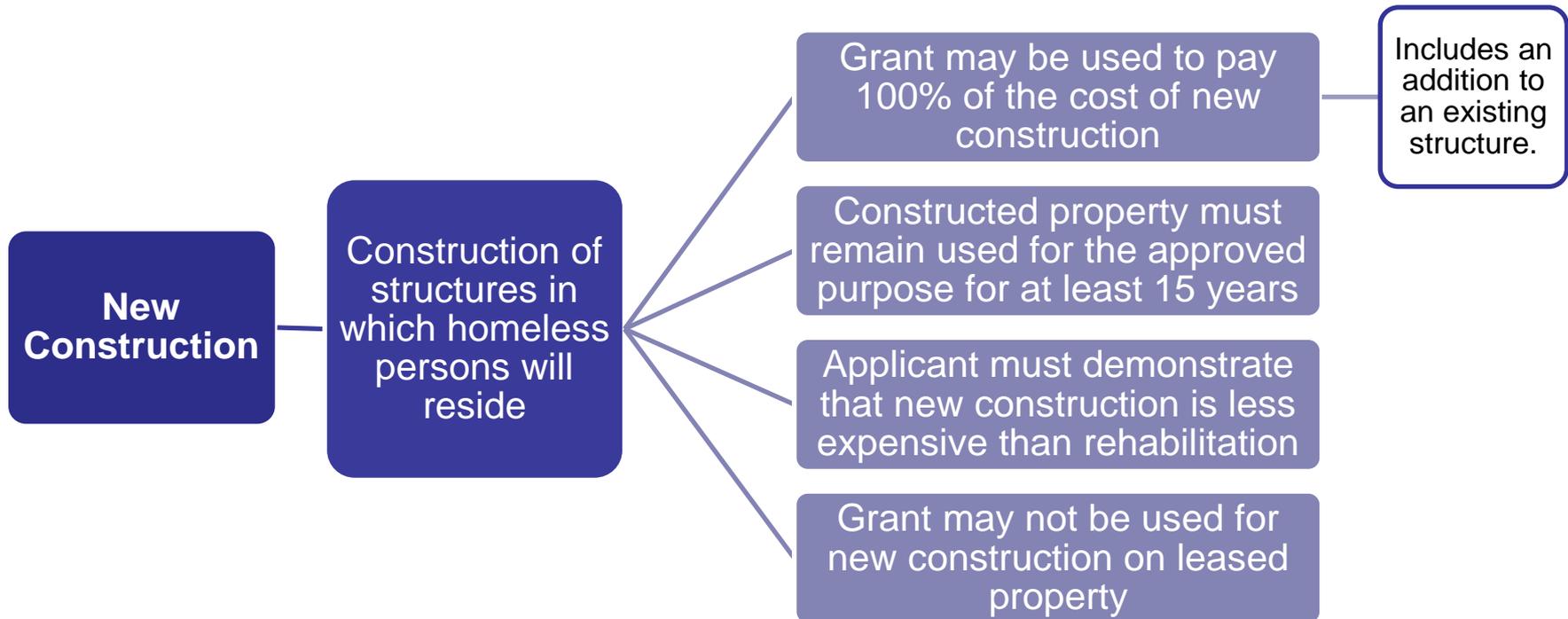
Eligible Costs – Rehabilitation



Eligible Costs under PH: PSH, TH, or SSO



Eligible Costs – New Construction



Eligible Cost under PH: PSH or TH

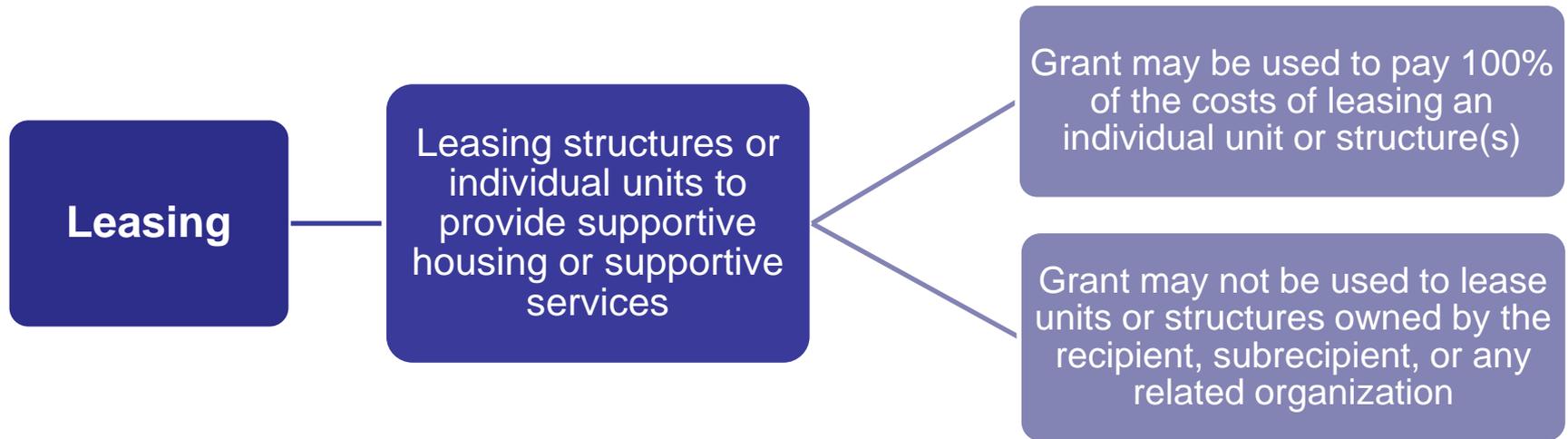


Hard Costs – Comparison

CoC Program	SHP, S+C, SRO Programs
Use restriction: 15 years	Use restriction: 20 years
No limit on grant amount for acquisition, rehab, and new construction	Limit on grant amount for acquisition, rehab, and new construction: \$200,000-\$400,000 per structure
Projects have 24 months to secure site control	Projects have 12 months to secure site control
The amounts requested for acquisition, new construction, and/or rehabilitation must be included in the match calculation for the grant. The total grant (minus funds for leasing) must be matched by 25% cash or in-kind resources.	100% cash match of total grant amount for acquisition, rehabilitation, and new construction to be spent on same budget line item.



Eligible Costs – Leasing

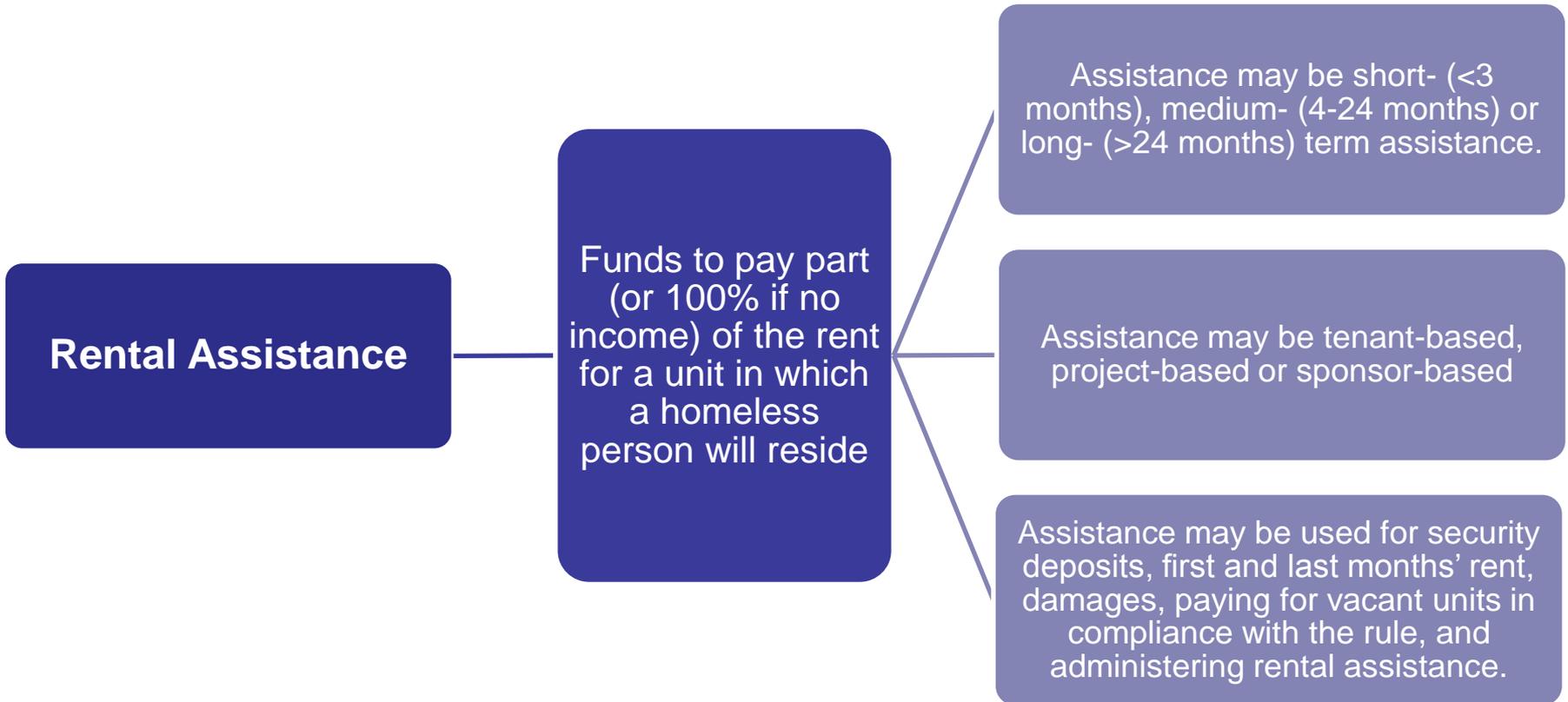


Eligible Costs under PH: PSH, TH, and SSO

A good source comparing leasing and rental assistance is located here:
<http://www.oneCPD.info/index.cfm?do=viewResource&ResourceID=4685>



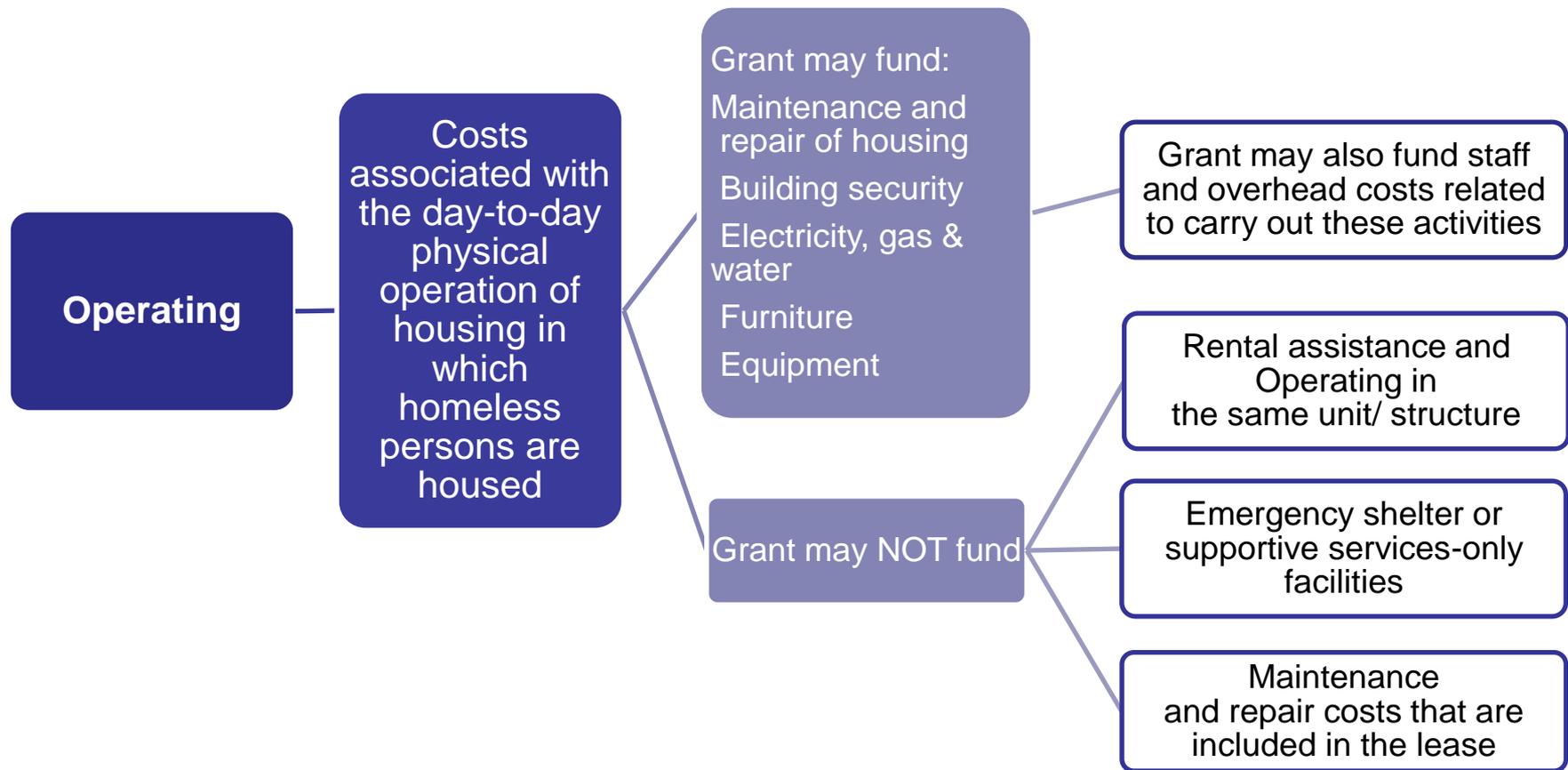
Eligible Costs – Rental Assistance



Eligible Costs under PH and TH



Eligible Costs – Operating



Eligible Costs under PH: PSH or TH



Eligible Costs – Supportive Services



Eligible Costs under PH, TH, SSO



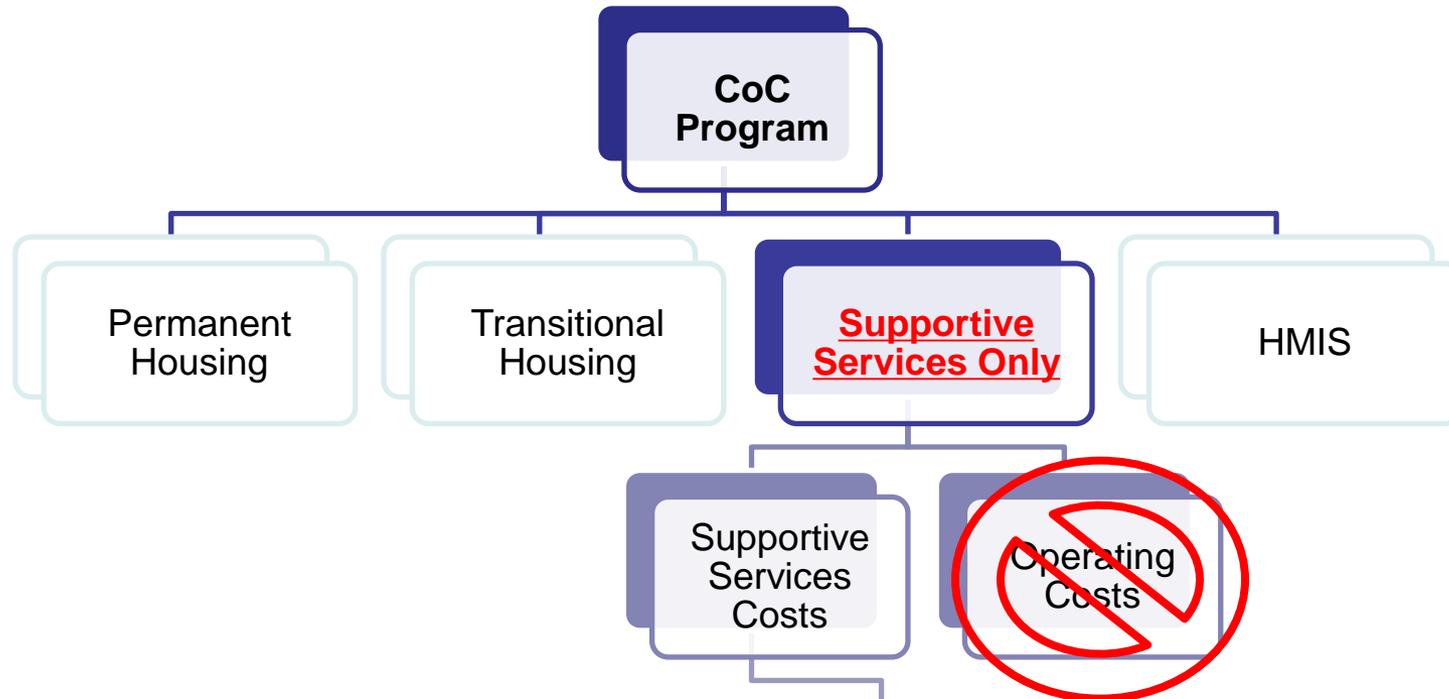
Eligible Costs – Supportive Services

Supportive Services - In general, grant funds may be used on those services listed in the CoC Program interim rule *only*

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



Operating Costs in SSO Projects



Day-to-day operation of the supportive service-only facility (maintenance, repair, building security, furniture, utilities and equipment) are eligible as a supportive service



HMIS Costs

Eligible HMIS costs under the HMIS program component are:

1. Leasing and operating the facility in which the HMIS is based
2. Hosting and maintaining HMIS software or data
3. Backing-up, recovering, or repairing HMIS software or data
4. Upgrading, customizing and enhancing the HMIS
5. Integrating and ware-housing data
6. Administering the system
7. Reporting to providers, the Continuum of Care, and HUD
8. Conducting HMIS training, including traveling to the training



Eligible Costs – Project Administration

Recipients may use up to 10% of the amount awarded for eligible grant activities to conduct:

- General management, oversight and coordination
- Training on CoC requirements
- Environmental review
- Rental assistance projects can carve out administrative costs

Recipients that are not UFAs are required to share at least 50% of project administrative funds with subrecipients

* Actual amount available is defined in the CoC Program NOFA

Eligible Activity under ALL components



Match Requirements

- All CoC Program costs and match must be in your approved budget
- Must be able to document all costs
- Match requirement - 25% cash or in kind for all line items except leasing
- Match is provided to the CoC Program grant - **not** to a budget line item
- Matching funds can only be used on eligible CoC Program costs



Understanding Match

- Match must be in the form of cash or in-kind contributions
- Is spent by or donated to the recipient or subrecipient to cover eligible costs of the project
- Costs incurred by a partnering organization to provide “in kind” services to the program participants must be documented by a MOU



What Is Not Match?

- Program Participant Savings
 - Savings belong to the program participant, not the recipient or subrecipient
- Program income
- Cash or any in kind contribution used as match for another grant.



Documenting Match

- Must document match to demonstrate compliance with CoC Program requirements
- Must keep source documentation (e.g., MOU) on file for review when needed
 - Requirements for the MOU:
 - Must establish the unconditional commitment
 - The specific service to be provided
 - The profession of the persons providing the service,
 - The hourly cost of the service to be provided.



RESIDENT RENT & OCCUPANCY CHARGES



Rent – Rental Assistance

Program Participant Contributions Are Required for Rental Assistance (except Rapid Re-housing)

- Rent must be charged and may not exceed the highest of:
 - 30 percent of the family's monthly adjusted income;
 - 10 percent of the family's monthly income; or
 - The portion of the family's welfare assistance, if any, that is designated for housing costs.



What is Rental Assistance?

Rental Assistance Includes:

- Processing rental payments to landlords;
- Examining participant income and family composition;
- Providing housing information and assistance;
- Inspecting units for compliance with housing quality standards
- Receiving new participants into the program

Expenses can be paid by:

- Using matching funds
- If the project is not 100 percent leased, rental assistance funds may be used
- Or if the project is 100 percent leased but the project is paying at below FMR rates, then it may use the excess.



Rental Assistance & Rapid Re-Housing

Rental Assistance Must Be:

- Short-term (up to 3 months) or medium-term (4-24 months)
- Tenant based

Recipient May Set Maximum:

- Amount of Rental Assistance
- Number of months tenants may receive assistance
- Number of times participants may receive rental assistance

Program Participants:

- Must have an initial lease for at least a year
- May be required to share in the costs of rent
- Are required to meet monthly with a case manager
- Must be re-evaluated at least once annually for eligibility

Funds May Be Used For:

- Rental Assistance payments
- Security deposits and first and last month's rent
- Vacancy payments



Utilities – Rental Assistance

- If tenant pays separately for utilities:





Occupancy Charges – Leasing

Program participants in housing assisted with leasing funds may be required to pay an occupancy charge.

- If occupancy charges are imposed, they may not exceed the highest of:
 - 30 percent of the family's monthly adjusted income;
 - 10 percent of the family's monthly gross income; or
 - The portion of the family's welfare assistance, if any, that is designated for housing costs.



When are Utilities Charged to the Leasing BLI

- Utilities as a leasing cost:
 - If electricity, gas, and water are included in the rent.
- Utilities as an operating cost:
 - if utilities are **not** included in the lease
- Utilities as a supportive service cost:
 - If the structure is being used as a supportive service facility



Program Income

- Program income is income received by the recipient or subrecipient that is directly generated by a grant-supported activity
 - Rent and occupancy charges are considered program income
- Program income from rent and occupancy charges in transitional housing can be used to assist residents moving to permanent housing
- Program income is **not** an eligible source of match



CHANGES THAT REQUIRE GRANT AMENDMENTS



What is a Significant Change?

UFAs and 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

CoCs with more than one recipient

- Change of recipient
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project
- 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



How To Make a Change

- For significant changes, recipients should:
 - Prepare a detailed, written request to the HUD Field Office
 - Explain the reason for the change
 - Justify same or better level of service
 - Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)



Amendments and Changes

- For minor changes, the recipient must:
 - Fully document any changes
 - Maintain documentation and make it available to HUD during on-site reviews or upon request



RECORDKEEPING



Recordkeeping Requirements

- Obtain documentation from qualified source
- Maintain the records in your files
- Monitor at least annually for compliance



Recordkeeping Requirements

- CoC Records
- UFA 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 Furthering Fair Housing
- Other Federal Requirements
- Subrecipients and Contractors
- Other Records Specified by HUD



Recordkeeping Requirements

- Confidentiality
 - All records containing protected information will be kept secure and confidential.
 - The address or location of any program participant will not be made public.
- Record Retention
 - All records must be retained for the greater of 5 years
 - Acquisition, new construction, or rehabilitation records must be retained for 15 years after the date the project site is first occupied



ANNUAL PERFORMANCE REPORTS (APR)



E-snaps APR

- Projects with operating year ending on or after June 1, 2011 must submit the CoC Full APR in *e-snaps*
- Recipients have 90 days from the end of their operating year to submit the APR
- Recipients must use data collected according to the latest version of the HMIS Data Standards
 - The most current version to date is the revised HMIS Data Standards published March 2010:
https://www.onecpd.info/resources/documents/FinalHMISDataStandards_March2010.pdf



E-snaps APR

- HUD is developing a revised APR per the creation of the requirements of the CoC Program by the HEARTH Act
- The APR will largely resemble its current format
- Changes will reflect changes under the McKinney-Vento Act, as amended by the HEARTH Act, to include:
 - The ability to report data specific to rapid re-housing
 - Data on chronically homeless persons



E-snaps APR

- Performance measures provide an opportunity to quantify what recipients accomplished
- *E-snaps* will only show the questions that pertain to the recipients' program so questions are not sequential
- Response to Q3- Project Information is critical to determining what questions the recipients will see on the APR



APR Guidebook

- For each question on the CoC APR, the guidebook (currently v.4) provides detailed information and screenshots on how to enter data from your HMIS into *e-snaps*
- Grantees should review the guidebook prior to submitting a CoC APR:
<https://www.onecpd.info/resources/documents/esnapsCoCAPRGuidebook.pdf>



Answering Questions in *e-Snaps*

- All questions with an asterisk require a response
- Most questions have an automatic validation check when you click “Save”
- If the system detects an error in your data, a message will appear in red font at the bottom of the screen, alerting you of the error
- You will not be able to submit your APR until you have corrected all identified errors
- The system can run slowly, sometimes taking several minutes to load between pages



Key Definitions

Adult	Any person 18 years of age or older
Children	Any person under the age of 18
Household	Either a single person or multiple persons who jointly participate in a program
Households without Children	Unaccompanied adults Multiple adult households Pregnant women over 18 not accompanied by other children
Households with Children	Any household with at least one adult and one child
Households with Only Children	Persons age 17 and under, including: Unaccompanied youth Adolescent parents and their siblings Adolescent siblings
Households of Unknown Category	Persons who cannot be listed in the above household types due to missing dates of birth



Key Definitions

Leavers

participants who exited and were not in the program on the last day of the operating year

Stayers

participants who were in the program on the last day of the operating year. Includes participants who exited the program and re-entered the program before the end of the operating year



HMIS Questions

Question 6 – Bed Coverage Rates

- A bed is covered in HMIS if:
 - The project is making reasonable efforts to record all universal and program specific data elements on all clients served by that bed
- AND**
- Project directly enters client data into HMIS or uploads data through an agreed upon method at least annually

*Note 1: Victim services providers will not see this question on the APR as they are **prohibited** by VAWA to enter data into HMIS*

Note 2: SSO grantees will not see this question on the APR as those grants do not pay for housing



HMIS Questions

Question 7 – Data Quality

- Assess the quality of the HMIS data
- Report on the extent to which required universal and project specific data are recorded in HMIS
 - Percentages of “Don’t Know” or “Refused”
 - Percentage of missing data for each element listed



HMIS Questions

Question 30 – Expenditures & Match

- Divided into 4 sections
 - Development costs
 - Supportive Services costs
 - HMIS costs
 - Leasing/Operations/Admin costs
- Match does not require a row by row entry but is summarized by category for the operating year



HMIS Questions

Question 34

- Reports the percentage of the total annual project budget that is funded through McKinney-Vento funds
- Grantees must provide the percentage of HUD funds that support the full program budget, not the percentage of HUD funds that support the agency's budget
- For example, if this program has a \$300,000 budget, and the CoC Program grant provides \$100,000 annually, then the response to this question should be 33 percent



HMIS Questions

Question 3 – Guidance for VAWA Providers

- Specify if your program is operated in whole or in part by a victims service provider as defined in section 40002 of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (42 U.S.C. 13925), also referred to as VAWA



Performance Measurement

- Focus of APR is on reporting on progress made in achieving program level goals
- Two types of performance measures in APR:
 - HUD defined (project type specific)
 - Project defined



HEARTH Act Focuses on Performance

- Greater focus on CoC-level performance measures – such as...
 - Reducing the length of time individuals and families remain homeless
 - Reduction in the number of times individuals and families experience homelessness
 - Success of outreach to homeless individuals and families
 - Overall reduction in the number of homeless individuals and families
 - Jobs and income growth for homeless individuals and families;
 - Success of prevention efforts
 - Success in achieving outcomes related to serving families with children and youth defined as homeless under other federal statutes



Performance Measurement

- In the Project Application, new and renewal applications set targets for accomplishments during the operating year
- Each performance measurement question has a narrative section to allow for explanation of discrepancies between projected and actual accomplishments



Performance Measurement

Question 36 – Categories for SHP

- Permanent Housing
- Transitional Housing
- Services Only - Street Outreach
- Services Only – with Housing Goals
- Safe Haven



Performance Measurement

Permanent Housing

- Housing stability
 - Maintained or exited to new permanent housing
- Total Income Measure
 - Maintained or increased total income
- Earned Income Measure
 - Maintained or increased earned income



Transitional Housing

- Housing stability
 - Exited to permanent housing
- Total Income Measure
 - Increased total income
- Earned Income Measure
 - Increased earned income



Performance Measurement

Services Only – Outreach

- Housing Stability
 - Placed into housing (ES, TH, PH)
- Services Linkages
 - Received a service for a physical or mental health condition that they were not receiving at program entry
- Report on Leavers only



Services Only – with Housing Goal

- Housing Stability
 - Exited to permanent housing
- Total Income Measure
 - Increased total income
- Earned Income Measure
 - Increased earned income
- Report on Leavers only



Performance Measurement

Safe Havens

- Housing Stability
 - Remained in Safe Haven or exited to permanent housing
- Total Income Measure
 - Maintained or increased total income



Performance Measurement

Question 37

- Optional for all projects except for the following:
 - SSO projects that are not outreach or have a housing goal
 - Projects that listed additional goals in the Project Application
 - Data is not required to be entered into HMIS
 - Measured by methods described in the Project Application



APR – Questions 40 & 42

Question 40

- Allows the recipient to describe any significant accomplishments during the program year

Question 42

- Allows for comments on any areas that may need an explanation
- For example: differences in projected and actual project outputs or bed utilization



MONITORING AND COMPLIANCE



Monitoring

- Determine compliance with statute, regulation, NOFA, and OMB Circulars
- Determine whether activities are implemented as described in application
- Conduct review remotely or on-site



Monitoring Areas

Beneficiaries	Housing	Supportive Services
Project Progress	Match Documentation	Subrecipient Management
Overall Systems Management	Financial Management	Cost Allowability
Procurement	Equipment and Equipment Disposition	Other Federal Requirements



Monitoring: Participant Eligibility

- Example of compliance issue:
 - Insufficient documentation to support eligibility:
 - Homeless status
 - Chronic homelessness status
 - Disability



Monitoring: Eligibility Documentation

- Examples of compliance issues:
 - Disability not documented or signed by a person not credentialed to make a diagnosis
 - Notes do not illustrate participant's situation, barriers, needs, and other factors
 - Initial consultation files not signed/dated – unclear chronology when documenting chronic homelessness episodes



Monitoring: Supportive Services

- Examples of compliance issues:
 - Individual supportive services plans not in program participants' files
 - Ongoing program participant assessments not completed and/or documented in file



Monitoring: Resident Rents

- Examples of compliance issues:
 - Overcharging rent
 - Income verification inadequate
 - Not reviewing income annually





Monitoring: Lead-based Paint

- Examples of compliance issues:
 - Lead-based paint visual assessments were not conducted for ALL units receiving financial assistance if they were constructed before 1978, and will have a child under age 6 or pregnant woman residing in a unit.
 - Landowner/landlord remediation not completed where units failed inspection



Monitoring Financial Documentation

- Examples of compliance issues:
 - Missing or insufficient documentation for incurred expenses and/or ineligible expenses
 - Drawing a percentage of the grant each month with no support of why the money was drawn
 - Reimbursement of expenses outside the grant term
 - Lack of financial oversight for subrecipients
 - Paying rental expenses over the FMR
 - Salary costs cannot be tied to an eligible grant expense
 - Paying rent to someone who is not the property owner



Monitoring: Match

- Examples of compliance issues:
 - Insufficient Match
 - In-kind services provided by a third-party without an MOU that are counted as match
 - Ineligible sources used as match
 - Inadequate tracking and documentation of match



Monitoring: Staff Time Distribution

- Examples of compliance issues:
 - Lack of time distribution records for HUD funded staff.
 - Not keeping time and activity records
 - Estimated hours or hours based on percentages
 - Salary cannot be linked to program participants or actual tasks
 - Case management salary cannot be linked to participants
 - Use of a calendar to track time, but cannot be tied back to the salary paid
 - Estimated fringe, instead of actual
 - Timesheets not signed or dated by supervisor



TIMELINESS STANDARDS



Timeliness Standards

- Recipients must *promptly* initiate approved CoC Program-funded projects.
 - Non-construction projects must begin within 12 months
 - Construction activities must begin within 9 months and be complete within 24 months



Timeliness Standards

- Once activities begin, recipients must draw down funds at least once per quarter.
- Recipients must distribute funds to subrecipients in advance of expenditures
- Recipients must distribute funds to subrecipients within 45 days of approvable request.



Operating Start Date and Program Year

- Operating start date - When the project started to serve homeless persons
 - New projects without acquisition or construction starts the 1st day of month that the recipient incurs eligible costs.
 - New projects with acquisition or construction starts the 1st day of month following completion of acquisition or construction.
 - Renewal grants start the day after the end of previous grant term.



Operating Start Date and Program Year

- Operating Start Date sets beginning of 12-month program year
- The Annual Performance Report is based on the period defined by the operating start date.



PROPERTY REQUIREMENTS



Housing Quality Standards

- Lead-based paint requirements

24 CFR 982.401

Rehabilitation
Requirements:
24 CFR part 35
Subparts A, B,
J, and R

Project or
Sponsor Based
Rental
Assistance:
24 CFR part 35
Subparts A, B,
H, and R

Acquisition,
Leasing,
Services, or
Operating
Costs:
24 CFR part 35
Subparts A, B,
K, and R



Environmental Review

- Activities under the CoC Program are subject to environmental review by a responsible entity under 24 CFR Part 58.



Environmental Review

CoC Program activities that are **subject to** environmental review include:

- Acquisition, rehabilitation, new construction
- Leasing
- Sponsor-based and project-based rental assistance

CoC Program activities that are generally **excluded** from environmental review include:

- Tenant-based rental assistance
- Supportive services
- Operating costs
- HMIS



Environmental Review

- No activities can be performed on a project site until HUD has completed the environmental review and has given approval of the property
- If environmental issues are found, mitigating measures required by HUD for the original property must be carried out or an alternative eligible property must be selected
- It is the responsibility of the recipients to carry out the mitigating measures required by HUD or select an alternative eligible property and to facilitate the review

HUD has the right to eliminate from consideration any application that would require an Environmental Impact Statement (EIS)



Other Program Requirements

Limitation on
Transitional
Housing

Term of
Commitment

Displacement,
Relocation,
and Acquisition

Limitation on
Use of Funds

Termination
Policy

Fair Housing
and Equal
Opportunity

Conflict of
Interest

Other Federal
Requirements



Limitation on Transitional Housing

- A homeless individual or family may remain in TH for up to 24 months or a longer period if necessary to facilitate the movement into PH.
 - However, HUD may discontinue assistance for TH projects if more than half of the individuals or families remain in the project for more than 24 months.



Conflicts of Interest

- Procurement
 - Must comply with codes of conduct and conflict of interests requirements under 24 CFR 85.36 (for governments) and CFR 84.42 (for private nonprofits)
- The recipient and subrecipient must document its compliance with the homeless participation requirement under 24 CFR 578.75(g)
- No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a CoC Program grant or other financial benefits to the organization that the member represents.



Limitation on Use of Funds

- No assistance may be used to replace state or local funds previously used/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



Limitation on Use of Funds

- In a single structure or housing unit, the following types of assistance cannot be combined:
 - Leasing and acquisition, rehabilitation, or new construction
 - Tenant-based rental assistance and acquisition, rehabilitation, or new construction
 - Short- or medium-term rental assistance and acquisition, rehabilitation, or new construction
 - Rental assistance and leasing
 - Rental assistance and operating



Line of Credit Control System (LOCCS)

Dialing for Dollars



Beginning the Process

- Minimum of two people with LOCCS access authorization
- USERID issued by LOCCS Security
Do **NOT** share this number with anyone
- 10-digit VRS number
- Voucher



Making the Call

- Prepare the voucher
- Call LOCCS
- Enter USERID and password
- Select SNAP as the program area
- ESTABLISH OPERATING START DATE



Making the Call

- Enter the 3-digit program number
 - 001
- Write down the remaining six digits of the voucher number
- Reenter the 9-digit voucher number
- Enter the 4-digit line item number
- Funds are wired within 48 hours
- Allowed one call per day per grant



LOCCS Checklist

- Is there a voice response number?
- Has an operating start date been established?
- Is there adequate source documentation?
- Costs charged to correct grant?
- Is request consistent with approved budget?
- Is request for correct grant term?
- Is request for correct month?
- What is the source and use for the match for this draw?
- Has the voucher form been completed; signed and dated?



Resources

A list of CoC Program resources including webinars, user guides, and tools can be found at:

www.onecpd.info/coc