

Basically CoC Training

Ground rules: Please mute your microphone. Please use the chat function to ask any questions. You may ask questions through the chat at any time.

If we have time at the end of the presentations, we will open up the lines for Q & A time. If we are unable to answer your question, your CPD Representative will follow up.

We will send a copy of this presentation no later than tomorrow COB.

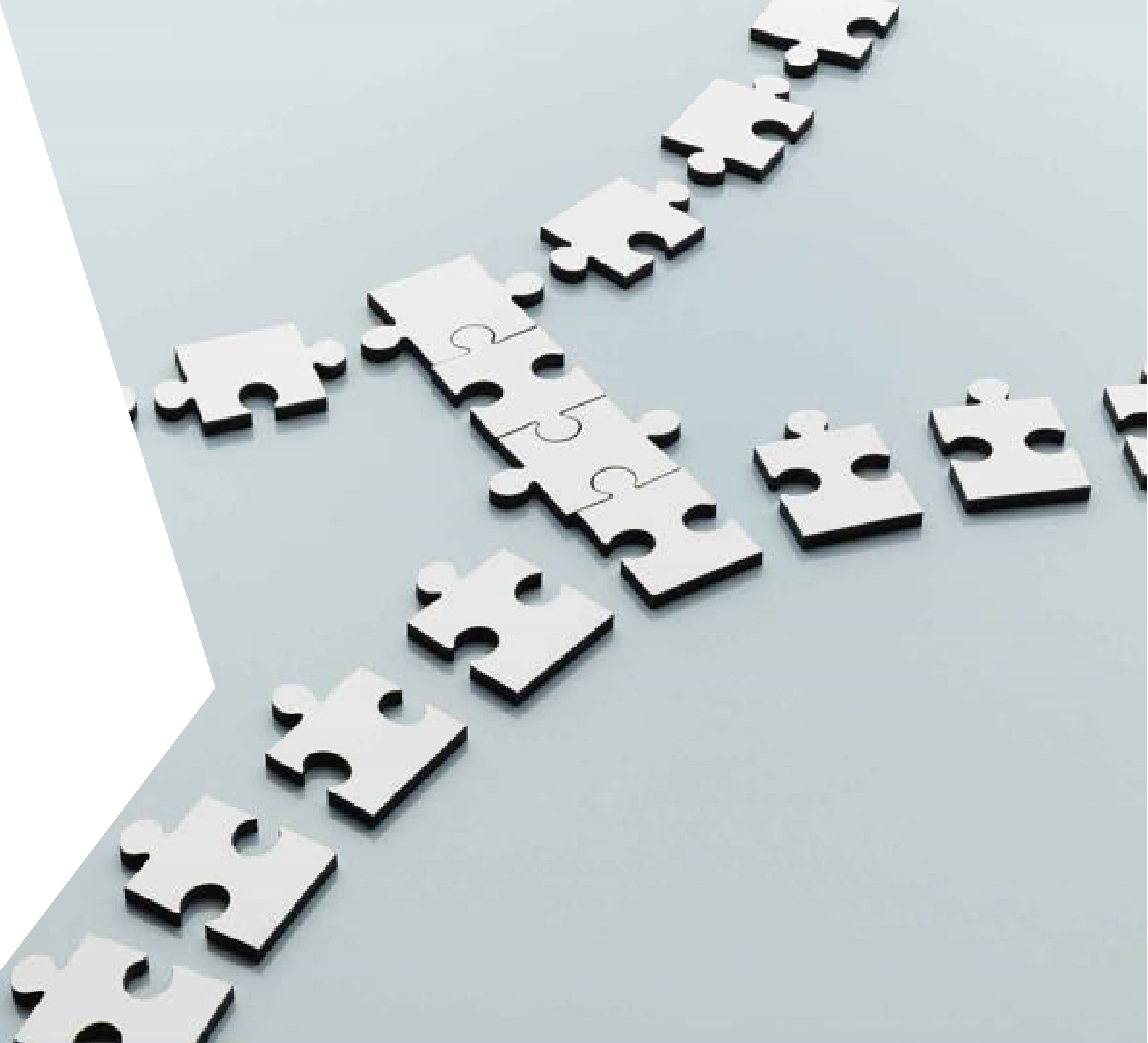
We will begin in at 9:02 AM.

Basically CoC Training

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Objective

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



► Program Overview

Program Goal

HUD Systems for Grant Management

Quarterly Spending Reports

CoC Written Standards

Program Goal

- ▶ To end homelessness by providing funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families
 - ▶ Authority: McKinney-Vento Homeless Assistance Act as amended by the HEARTH Act (Interim Rule)
 - ▶ Regulations: 24 CFR 578

Operating Year

- ▶ The operating period is typically 12 months (exceptions include: construction/rehab projects, grant consolidations, extension requests)
- ▶ Renewal grants start the day after the end of the previous grant term
- ▶ New projects with acquisition or construction start the 1st day of the month following completion of those activities
- ▶ All other new projects start the 1st day of the month the recipient incurs eligible costs

**For planning grants, please reach out to your HUD Rep.*

HUD Systems for Grants Management



- ▶ Application submission
- ▶ e-snaps@hud.gov



- ▶ Annual Performance Report (APR) submission
- ▶ [HUD Exchange: Ask A Question](#)



- ▶ Grant disbursement system
- ▶ [eLOCCS Access Guidelines for Grantees](#)

Recertifying of Users by Approving Officials

- ▶ Approving Officials (AO) need to recertify users as soon as the notification from eLOCCS arrives.
- ▶ The user and the AO need to ensure they **access the system on a quarterly basis** to maintain their access.
- ▶ Both users and AO need to sign onto eLOCCS every three months to ensure their access is maintained.
- ▶ Per [24 CFR 578.85](#) Timeliness Standards (c) *Distribution* (3) Draw down funds at least once per quarter of the program year, after eligible activities commence.
- ▶ If you lose access, please contact your CPD Representative.
- ▶ DO NOT contact LOCCS security directly. Doing so will cause delays in processing that may take time to correct.

Application Process of New Users/Coordinators

- ▶ FIRST Reach out to our HUD Rep for guidance.
- ▶ **Please do not contact/email LOCCS security directly.**
- ▶ Field Office can send you a sample HUD Form 27054e form to guide you.
- ▶ When filling out the HUD Form 27054e form, please note the following:
 - ▶ All users needs an M number
 - ▶ If the user does not have one, please call Reac @ 888 245 4860 Option 1.
 - ▶ Once the Financial Analyst approves the form, the form can be notarized.
 - ▶ Please make sure that both the User and Approving Official are notarized, and the dates are the same.
- ▶ The amount of time it takes to establish access for new users or to recertify access for current users and/or AOs depends on the accurate and timely submission of the required forms being sent to your CPD Rep via email. In other words, access approval is contingent upon timely responses from grantees.

Secret Language of Grant Numbers

Example Project Number CA0565L9D012103

- ▶ CA = state abbreviation
- ▶ 0565 = project identification number
- ▶ L = applicant type
- ▶ 9D = field office correspondence code
- ▶ 01 = last two digits of the CoC regional number
- ▶ 21 = year of funding
- ▶ 03 = renewal sequence number

Spending Reports

- ▶ CoCs receive quarterly CoC Spending Reports with expenditure information from eLOCCS.
- ▶ The report contains basic information about the grant (e.g., the applicant and grant number) and expenditures as reported in eLOCCS (e.g., contract amount and current balance).
- ▶ Recipients have a responsibility to analyze what resources are needed to address homelessness in their communities and to ensure existing resources are being maximized.
- ▶ It is IMPORTANT for recipients to have timely expenditures Quarterly drawdowns are a regulatory requirement. 578.85 (c) (2) and (3).



125,058	154,568	95,054
125,487	56,845	97,511
124,000	110,000	99,011
105,450	150,000	99,216
86,502	35,000	101,090
	83,000	101,684
	45,000	101,962
		102,747
		106,006

CoC Written Standards

- ▶ A CoC must establish and follow written standards that include:
 - ▶ Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
 - ▶ Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance
 - ▶ Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance
 - ▶ Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance
 - ▶ Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance (these policies must include the emergency transfer priority)

Written Standards

- ▶ As a part of the CoC Grant agreement, a recipient agrees to follow the written standards of the CoC
- ▶ The recipient should ensure that they adopt the CoC's written standards
 - ▶ And should be able to demonstrate that they have complied with the standards



A close-up photograph of a person's hands writing on a white document with a pencil. The person is wearing a dark red long-sleeved shirt. The background is blurred, showing a light-colored wall and a wooden desk. The image is positioned on the left side of the slide, partially overlapping a blue geometric design.

The Importance of Agency Policies and Procedures

- ▶ Ensures Continuity and Consistency of Operations and Service Delivery
- ▶ Provides Substantive SMART Goals for both Program Delivery and Financial Compliance
- ▶ Provides Clear Operational Guidelines for Management and Staff through Agency growth and/or changes over time
- ▶ Results in Development and Maintenance of funding based on successful sustained performance



Program

- ▶ Components

PH-PSH

Permanent Housing: Permanent Supportive Housing

PH-RRH

Permanent Housing: Rapid Re-Housing

TH

Transitional Housing

Joint TH-RRH

Joint Transitional Housing and Rapid Re-Housing

Joint PH-RRH

Joint Permanent Housing and Rapid Re-Housing

SSO

Supportive Services Only

HMIS

Homeless Management Information System

Program Components

PH: Permanent Supportive Housing

PH-PSH Permanent Supportive Housing	
PH-RRH	<ul style="list-style-type: none">▶ Long-term housing assistance with supportive services to assist homeless persons with a disability to live independently.▶ Families are eligible in which one adult or child has a disability and the family has a qualifying head of household▶ Serves chronically homeless and dedicated PLUS populations▶ Lease must be for a least one year, renewable and terminable only for cause
TH	
Joint TH-RRH	
SSO	
HMIS	

578.37 (a)(1)(i) *Permanent supportive housing for persons with disabilities (PSH)*

PH: Rapid Re-Housing

PH-PSH

Permanent Supportive Housing

PH-RRH

Rapid Re-Housing

TH

Joint TH-RRH

SSO

HMIS

- ▶ Short-term (3 months) or medium-term (4-24 months) rental assistance with supportive services to assist homeless persons obtain permanent housing
- ▶ Lease must be for a least one year, renewable and terminable only for cause
- ▶ Projects must follow CoC-determined, community-wide written policies related to determining eligibility, prioritizing assistance, and calculating the amount of rent that each participant is required to contribute to rental costs

578.37 (a)(1)(ii) *Rapid rehousing*

Transitional Housing

PH-PSH

Permanent Supportive Housing

PH-RRH

Rapid Re-Housing

TH

Transitional Housing

Joint TH-RRH

SSO

HMIS

- ▶ Temporary housing with supportive services to facilitate the participant's obtainment of permanent housing within 24 months
- ▶ Program participants must have a lease, sublease, or occupancy agreement for a term of at least one month and up to 24 months

578.37 (a)(2) *Transitional Housing (TH)*

Social Services Only

PH-PSH	Permanent Supportive Housing
PH-RRH	Rapid Re-Housing
TH	Transitional Housing
Joint TH-RRH	Joint Transitional Housing/Rapid Re-Housing
SSO	Social Services Only
HMIS	<ul style="list-style-type: none">▶ Provides supportive services to unsheltered or sheltered homeless persons for whom the recipient is not providing housing or housing assistance (most commonly, for the operation of the coordinated entry system)

578.37 (a)(3) *Supportive Service Only (SSO)*

Homeless Management Information System

PH-PSH	Permanent Supportive Housing
PH-RRH	Rapid Re-Housing
TH	Transitional Housing
Joint TH-RRH	Joint Transitional Housing and Rapid Re-Housing
SSO	Social Services Only

HMIS

Homeless Management Information System

- ▶ Only available to the HMIS Lead agency to cover items like operating, managing, and upgrading the CoC's HMIS
- ▶ Recipients funded under all other component types can request an HMIS budget line item for costs of contributing client-level data to the HMIS

578.37 (a)(4) HMIS. Funds may be used as noted and for other costs eligible at § 578.57.



Participant

- ▶ Eligibility

Categories of Homelessness

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
Other	Chronic Homelessness (includes disability)

Literally Homeless

Category 1 Literally Homeless

Category 2

Category 3

Category 4

Other

An individual or family who lacks a fixed, regular, and adequate nighttime residence. Three circumstances meet this definition:

- ▶ Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation
- ▶ Living in a shelter designated to provide temporary living arrangements
- ▶ 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 of Homelessness

Category 1

Literally Homeless

Category 2 Imminent Risk of Homelessness

Category 3

Category 4

Other

An individual or family who will imminently lose their primary nighttime residence, provided that:

- ▶ Residence Lost Within 14 Days; and
- ▶ No Subsequent Residence; and
- ▶ Lack of Resources or Support Networks

Homelessness Under Other Federal Statutes

Category 1

Literally Homeless

Category 2

Imminent Risk of Homelessness

Category 3 Homeless Under Other Federal Statutes

Category 4

Other

- ▶ HUD has not authorized any CoC to serve the homeless under Category 3. HUD determines and approves the use of CoC Program funds to serve this population based on each CoC's Consolidated Application.

Fleeing/Attempting to Flee Domestic Violence

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

Other

An individual or family who:

- ▶ Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions; and
- ▶ Has no other residence; and
- ▶ Lacks resources/support networks to secure permanent housing

Chronically Homeless

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

Other Chronically Homeless

A homeless individual (or families with an adult or minor head of household who meets the criteria)

- ▶ Meets the definition of Literally Homeless; and
- ▶ With a disability; and
- ▶ Has been homeless for at least 12 months

Chronically Homeless-Disability

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

Other

Chronically Homeless

The individual or head of household with a disability that:

- ▶ Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post traumatic stress disorder, or brain injury; or
- ▶ With a developmental disability; or
- ▶ With HIV/AIDS

Eligibility Per Component Type

	PSH*		RRH	TH	SSO
	New ±	Renewal			
Category 1 <i>Literally Homeless</i>	X	X	X**	X	X
Category 2 <i>At Imminent Risk</i>				X	X
Category 3 <i>Homeless under other federal programs</i>	* No CoC was approved to serve Category 3 with FY 2019 CoC Program Funds				
Category 4 <i>Fleeing domestic violence, etc.</i>	X	X	X	X	X

± Requires chronic homeless status

* Requires a disability

** Must be residing on the streets or in an emergency shelter

Getting Started with Documentation

Homeless Status

- ▶ Which category of homelessness does the client fall under?

Getting Started With Documentation



Homeless Status

Documentation
Requirements

- ▶ What are the documentation requirements for that specific category?

Getting Started With Documentation



- ▶ What is the preferred method of documentation for that category?



THIRD PARTY
DOCUMENTATION



INTAKE WORKER
OBSERVATIONS



SELF-CERTIFICATION
FROM CLIENT

Preferred Order of
Documentation

Category 1: Literally Homeless Documentation

Literally Homeless

- ▶ HMIS record of street outreach contacts
- ▶ Written referral by street outreach provider
- ▶ Written observation of an outreach worker of the living conditions
- ▶ Written observation by a community member of the living conditions
- ▶ Written observation by staff of the living conditions and explanation of attempts to secure third-party documentation
- ▶ Certification by the individual or head of household seeking assistance and explanation of attempts to secure third-party documentation

Category 2: Imminent Risk of Homelessness Documentation

Imminent Risk of Homelessness

- ▶ Evidence that the household will be evicted by Court Order or similar state action within 14 days of the application date
- ▶ Evidence that the household will be unable to pay for additional nights within 14 days of the application date
- ▶ Oral statement by household member that the landlord will not let them stay (intake worker must certify credibility)
- ▶ Certification by head of household that no subsequent residence has been identified and lacks the resources and support networks necessary to obtain other permanent housing

Category 4: Fleeing/Attempting to Flee DV Documentation

Fleeing or Attempting to Flee Domestic Violence

- ▶ Self-certification from the client
- ▶ If not a victim service provider and safety would not be jeopardized, the oral statement must be documented by:
 - ▶ Written observation by the intake worker verifying the condition client is fleeing; or
 - ▶ Written referral from an organization from whom the individual or head of household has sought assistance

Chronically Homeless Documentation

- ▶ Refer to documentation examples for Literal Homelessness to document residing in a place not meant for human habitation.
- ▶ Next slide will discuss disability documentation
- ▶ To document length of homelessness and breaks in homelessness:
 - ▶ HMIS (or comparable database) record(s)
 - ▶ Written referral by another housing or service provider
 - ▶ Written physical observation by community members
 - ▶ Written physical observation or certification by intake staff

Disability Documentation

- ▶ Written verification of from a professional licensed by the state to diagnose/treat the disability
- ▶ Written verification from the Social Security Administration Receipt of a federal disability check (e.g., SSDI or VA Disability)

Documentation Procedures

1

Participate in CoC's coordinated assessment as part of intake

2

Follow the CoC's written standards for administering assistance

3

Have your organization's policies and procedures for administering assistance



► Eligible Costs

Eligible Costs: Let's Break it down ...

Eligible Costs	Program Components				
	Permanent Housing		TH	SSO	HMIS
	PH:PSH	PH:RRH			
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 vs. Approved Costs

What is the difference?

Eligible Costs	Approved Costs
All Costs included in the CoC Program Interim Rule	Each project has approved budget line items
	Recipients may only spend CoC Program Funds on approved costs
	HUD approval is required to amend the budget to spend money on the CoC Program eligible costs other than those that were included in the project budget approved through the application process

Leasing	Rental Assistance
<ul style="list-style-type: none"> • Rent • Up to two-months security deposit • First and/or last month's rent • Vacancy payments if recipient still meets lease requirements • Property damage is not allowable • Reminder - leasing funds can't be used to lease property owned by the recipient, subrecipient or a partner (can request good cause exception from HUD) 	<ul style="list-style-type: none"> • Rent • Up to two-months security deposit • First and/or last month's rent • Vacancy payments up to 30 days • Property damage up to one month is allowable; one occurrence per participant • Can pay rent for institutional stays up to 90 days • Costs of administering Rental Assistance • Reminder - if there will be a balance of unexpended RA funds, you may increase the number of clients served - more on this later

Eligible Costs:

Leasing vs. Rental Assistance

Eligible Costs: Supportive Services

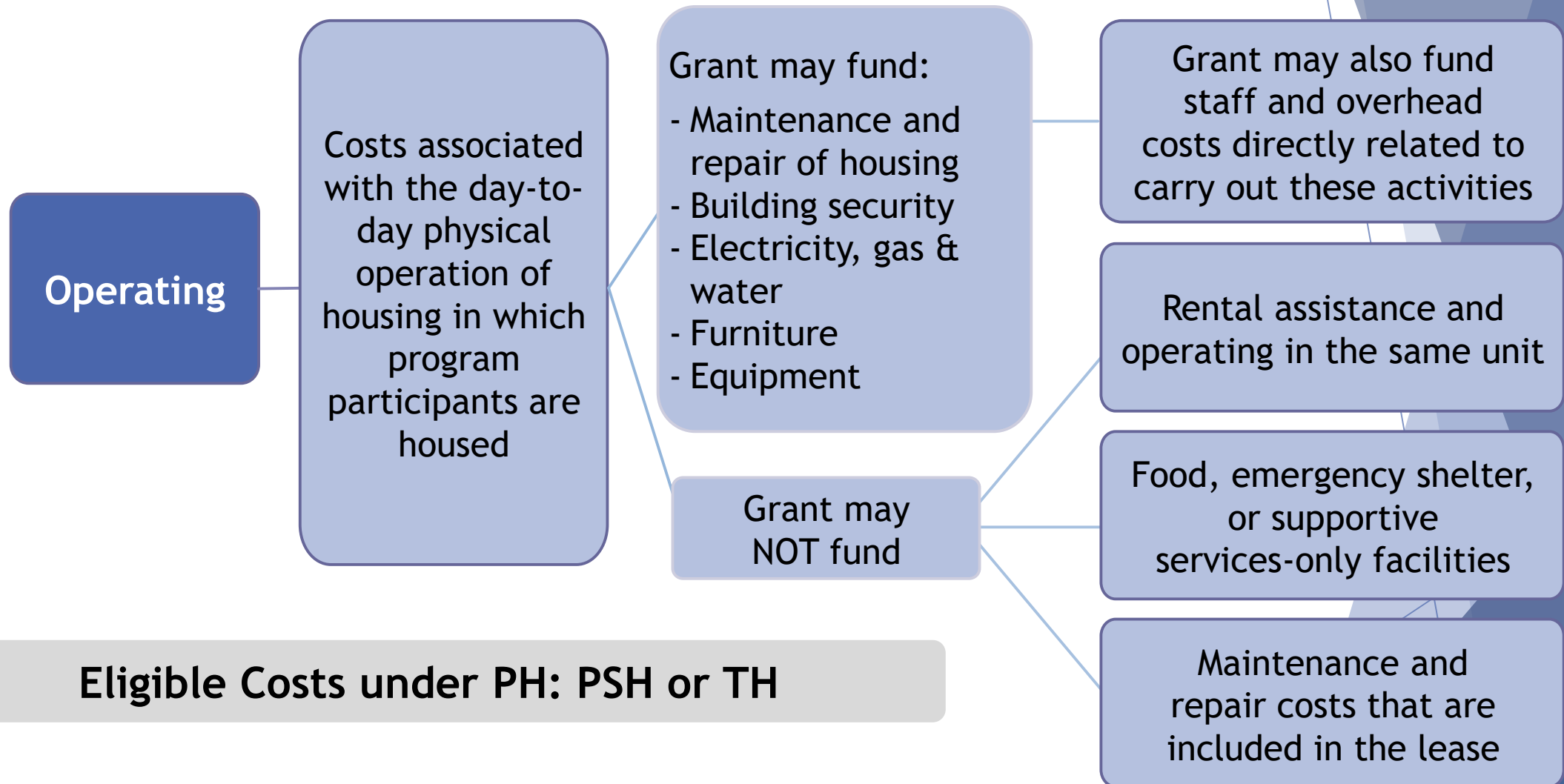
In general, grant funds may be used **only** on those services listed in the CoC Program interim rule:

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

*Services provided must assist program participants to obtain and maintain housing

*Grant may also fund staff and overhead costs directly related to carry out these activities

Eligible Costs: Operating costs



Eligible Costs under PH: PSH or TH

HMIS funds may be used for:

- Purchasing/leasing hardware or software licenses
- Leasing office space or utilities for HMIS activities
- Salaries, operating costs, and duties as required to operate an HMIS
- HMIS trainings
- HMIS reporting to the CoC

The **HMIS lead** can use HMIS funds for:

- Leasing/operating the HMIS facility
- Hosting and maintaining HMIS software and data
- Backing up, recovering, and/or repairing HMIS software or data
- Upgrading, customizing, and/or enhancing the HMIS
- Integrating and warehousing data
- Administering the system
- Reporting (providers, CoC, and HUD)
- Conducting HMIS training (incl. travel

Eligible Costs: HMIS

Any project may have an HMIS budget line item for costs associated with HMIS data collection.

A close-up photograph of a hand holding a silver pen, writing on a document. The hand is positioned on the left side of the frame, and the pen is angled towards the bottom right. The document is white with some faint, illegible text. The background is blurred, showing other parts of the document and possibly another hand.

Eligible Costs: Program Administration

Grantees may request up to 10% in addition to the base grant award (i.e. every activity except Administration) to conduct the following eligible administrative activities:

- ▶ General management, oversight, and coordination
 - ▶ Salaries, wages, and related costs of recipient's staff, staff of subrecipients, or other staff engaged in project administration
 - ▶ Travel costs incurred for monitoring subrecipients
 - ▶ Administrative services performed under third-party contracts or agreements (general legal services, accounting services, or audit services)

But wait ... there's more costs to be covered

Eligible Costs: Program Administration...

Projects may receive administrative funds worth an additional 10% of the total grant (not including administrative costs), which are awarded to conduct:

- ▶ Other costs for goods and services required for administration of projects (rental or purchase of equipment, insurance, utilities, office supplies, rental and maintenance - not purchase - of office space)
- ▶ Costs of providing training on CoC requirements and attending HUD-sponsored CoC trainings
- ▶ Environmental review





► Housing Requirements

Housing Quality Standards

Lead Based Paint

Environmental Reviews

Housing Quality Standards: Inspection time

Inspection Checklist

Housing Choice Voucher Program

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0169
(Exp. 04/30/2018)

Q: What are unit requirements?

A: Housing Quality Standards

- Units must be inspected for HQS, signed off by person completing the inspection and meet HQS and state and local codes **prior to expending CoC funds for rent (i.e. prior to move-in/start date of lease)**
- HQS compliance must be documented - **initial lease up and ongoing, at minimum once a year**
- No certifications required for inspection staff
- Deficiencies must be addressed within 30 days
- HQS Template Form can be found [here](#).



Lead-Based Paint: Why do we have rules?

Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X, to protect families from exposure to lead from paint, dust, and soil. Section 1018 of this law directed HUD and EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978.

The applicability of specific regulatory requirements depends on several housing factors including:

- ▶ Age of the housing unit(s)
- ▶ Property being disposed of or assisted by the federal government
- ▶ Type and amount of HUD assistance
- ▶ Whether the dwelling is rental or privately owned
- ▶ Whether the dwelling is occupied by a child less than six years of age

Lead-based Paint Screening Worksheet

Lead Screening Worksheet

About this Tool

The Lead Screening Worksheet is intended to guide grantees through the lead-based paint inspection process to ensure compliance with the rule. Program staff can use this worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used. A copy of the completed worksheet along with any additional documentation should be kept in each program participant's case file.

INSTRUCTIONS

To prevent lead-poisoning in young children, CoC grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Under certain circumstances, a visual assessment of the unit is not required. This screening worksheet will help program staff determine whether a unit is subject to a visual assessment, and if so, how to proceed. A copy of the completed worksheet along with any related documentation should be kept in each program participant's file.

Note: All pre-1978 properties are subject to the disclosure requirements outlined in 24 CFR 35, Part A, regardless of whether they are exempt from the visual assessment requirements.

BASIC INFORMATION

Name of Building _____

Address _____ Unit Number _____

City _____ State _____ Zip _____

Program Staff Signature: _____ Date: _____

PART 1: DETERMINE WHETHER THE UNIT IS SUBJECT TO A VISUAL ASSESSMENT

If the answer to one or both of the following questions is "no," a visual assessment is not triggered for this unit and no further action is required at this time. Place this screening worksheet and related documentation in the program participant's file.

If the answer to both of these questions is "yes," then a visual assessment is triggered for this unit and program staff should continue to Part 2.

1. Was the leased property constructed before 1978?

☐ Yes
☐ No

2. Will a child under the age of six be living in the unit occupied by the household receiving assistance? (Housing for the elderly, or a residential property designated exclusively for persons with disabilities. No child under the age of six shall be residing in the property.)

☒ Yes
☐ No

PART 2: DOCUMENT ADDITIONAL EXEMPTIONS (24 CFR 35.115)

If the answer to any of the following questions is "yes," the property is exempt from the visual assessment requirement and no further action is needed at this point. Place this screening sheet and supporting documentation for each exemption in the program participant's file.

If the answer to all of these questions is "no," then continue to Part 3 to determine whether deteriorated paint is present.

1. Is it a zero-bedroom or SRO-sized unit?

☐ Yes
☐ No

2. Has X-ray or laboratory testing of all painted surfaces by certified personnel been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint? (Inspections conducted in accordance with 24 CFR 35.1320 (a).)

☐ Yes
☐ No

3. Has this property had all lead-based paint identified and removed in accordance with HUD regulations?

☐ Yes
☐ No

4. Is the client receiving Federal assistance from another program, where the unit has already undergone (and passed) a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving assistance for a security deposit or arrears)?

☐ Yes (Obtain documentation for the case file.)
☐ No

5. Does the property meet any of the other exemptions described in 24 CFR [35.115\(a\)](#)?

☐ Yes
☐ No

Please describe the exemption and provide appropriate documentation of the exemption.

PART 3: DETERMINE THE PRESENCE OF DETERIORATED PAINT

To determine whether there are any identified problems with paint surfaces, program staff should conduct a visual assessment prior to providing financial assistance to the unit as outlined in the following training on HUD's website at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

If no problems with paint surfaces are identified during the visual assessment, then no further action is required at this time. Place this screening sheet and certification form (Attachment A) in the program participant's file.

If any problems with paint surfaces are identified during the visual assessment, then continue to Part 4 to determine whether safe work practices and clearance are required.

Lead-Based Paint: Leasing and Rental Assistance

	Leasing	Rental Assistance
Applicable Regulation(s)	24 CFR Part 35: <ul style="list-style-type: none">• Subpart A• Subpart B• Subpart H• Subpart R	24 CFR Part 35: <ul style="list-style-type: none">• Subpart A• Subpart B• Subpart K• Subpart R

Generally, recipients and subrecipients are expected to (A) screen for, (B) disclose the existence of, and (C) take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978

Lead-based Paint Policy & Procedures

- ▶ The policy states what the course of action was adopted by the agency.
- ▶ The procedures state who will do what in order to enact the policy.
 - ▶ It will provide step-by-step guidance on who is responsible for each step within the procedure.
 - ▶ It should be very detailed.
 - ▶ If the agency is monitored, HUD will request to see some sort of policy & procedures related to LBP.

Lead-Based Paint Policy and Procedures

POLICY

To prevent lead-poisoning in young children, CoC grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Under certain circumstances, a visual assessment of the unit is not required.

. must provide the lead hazard information pamphlet to any resident who will be residing in a unit built before 1978. The tenant must receive the pamphlet before moving into the unit.

For units older than 1978 which will house one or more children under the age of 6, landlord and tenant must complete a Lead-Based Paint Disclosure form. The form describes any known current or previous lead-based paint hazards, and documents tenant's receipt of records and the lead hazard information pamphlet. Additionally, a visual lead-based paint assessment must be completed by a person trained in this inspection process. The inspection may be completed in conjunction with the habitability inspection if the inspector is qualified. At Intake, it should be noted on the Application Form if there will be any child in the household younger than 6 years. This information should be provided to the habitability inspector prior to their examination of the proposed rental unit.

If a notification is received from a public health department or other medical health care provider that a child of less than 6 years of age living in a unit funded by CoC rental assistance, has an elevated blood lead level, an environmental investigation of the dwelling unit and common lead level, an environmental investigation of the dwelling unit and common areas servicing the dwelling unit in which the child lived, regardless of whether the child is still living in the dwelling. For more information, see 24 CFR 35.730 and 35.1225.

Essential service activities, such as, counseling, case management, street outreach, referrals to employment, etc., are exempt and excluded from the lead-based paint inspection requirements.

PROCEDURES

Program Director is responsible for completing the Lead Screening Worksheet.

The *Lead Screening Worksheet* is intended to guide grantees through the lead-based paint inspection process to ensure compliance with the rule.

1. The Program Director can use the worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used.
2. A copy of the completed worksheet along with any additional documentation should be kept in each program file.
3. If a lead-based paint visual assessment is required, Scharf Builders will conduct a visual assessment. The Program Director/Executive Director will contact Scharf Builders if a visual assessment is needed. Contact information can be found below.

- ▶ Landowner/landlord remediation not completed where units failed inspection.
- ▶ Agency must provide a completed lead disclosure form to occupants during lease-up or move-in along with any known records or reports regarding lead-based paint or lead hazards at the property. This must be evidenced in the tenant file.
- ▶ 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.

Resources to use:

[Lead Based Paint Disclosure Form](#)

[Lead Based Paint Pamphlet\(s\)](#)

[Lead Safe Housing Rule Compliance Advisor](#)

[Lead Safe Housing Rule Resource Portal](#)

Lead-Based Paint: Common compliance issues

Environmental Review

PROCESS

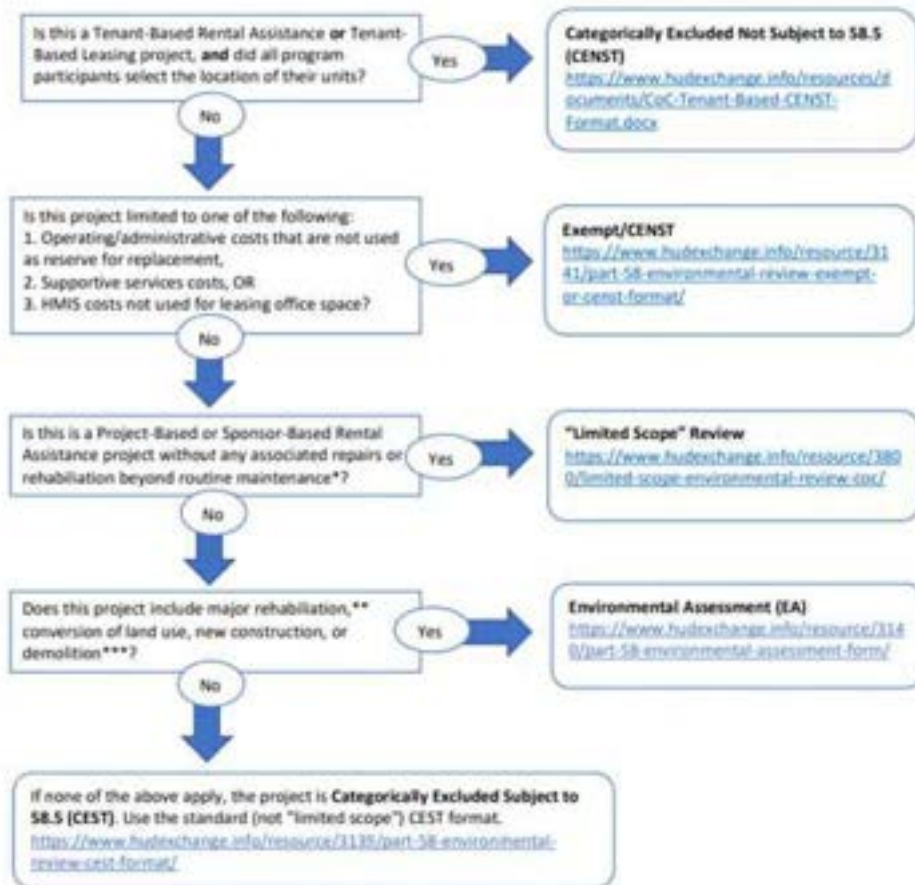
TYPES OF REVIEWS

Environmental Review

All new and renewal projects receiving Federal funds (including all CoC Program activities) require an environmental review

- ▶ Environmental reviews must be conducted BEFORE funds are committed
- ▶ Activities under the CoC Program require environmental reviews by a Responsible Entity (RE) under 24 CFR 58
- ▶ [Flowchart](#) to determine what kind of Environmental Review your project should complete

What level of review and which format should be used to complete environmental reviews for Continuum of Care (CoC) Program projects?



**This document applies only to CoC program projects.
For more information on determining level of review, consult 24 CFR Part 58.**

Important to Remember

- ▶ HUD may provide a blanket “exempt” review for a series of projects to include the units selected by the clients.
- ▶ In general, CoC agencies should go first to their Units of General Local Government (UGLG) for assistance in completing the reviews that are not exempt.
- ▶ **For** limited scope environmental review (ER), a grantee needs to perform them every 5 years. All the CENST level environmental reviews need to be completed annually.



Determining Rental

► Amounts

Fair Market Rate (FMR)

Rent Reasonableness

Fair Market Rent

Definition:

- ▶ Fair Market Rents (FMRs) are an **estimate of gross rent**, considering both rent and the cost of necessary utilities (except telephone service)
- ▶ FMRs are calculated for 530 metropolitan areas and 2,045 non-metropolitan areas nationwide at
 - ▶ <https://www.huduser.gov/portal/datasets/fmr.html>

****The FMR amount must be applicable to the geographic area in which the housing unit is located**





SAN DIEGO-CARLSBAD, CA MSA SMALL AREA FY 2023 FAIR MARKET RENTS

All Housing Choice Voucher programs operated in the San Diego-Carlsbad, CA MSA will use Small Area FMRs as defined by ZIP codes.

For FMR information for other programs, please click [here](#).

San Diego County, CA is part of the San Diego-Carlsbad, CA MSA, which consists of the following counties: San Diego County, CA. All information here applies to the entirety of the San Diego-Carlsbad, CA MSA.

In metropolitan areas, HUD defines Small Areas using ZIP Codes within the metropolitan area. Using ZIP codes as the basis for FMRs provides tenants with greater ability to move into "Opportunity Neighborhoods" with jobs, public transportation, and good schools. They also provide for multiple payment standards within a metropolitan area, and they are likely to reduce need for extensive market area rent reasonableness studies. Lastly, HUD hopes that setting FMRs for each ZIP code will reduce overpayment in lower-rent areas.

NOTE: ZIP Code areas are defined by the postal service to facilitate the efficient delivery of mail. Because of this, ZIP code areas may cross city, county, and in some limited instances, state lines. Consequently, ZIP codes which cross county lines may lie within more than one metropolitan area, or cover parts of one or more nonmetropolitan counties and part of a metropolitan area.

San Diego-Carlsbad, CA MSA Small Area FMRs By Unit Bedrooms					
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
91901	\$1,630	\$1,790	\$2,280	\$3,120	\$3,790
91902	\$1,930	\$2,120	\$2,700	\$3,690	\$4,490
91903	\$1,710	\$1,890	\$2,400	\$3,280	\$3,990
91905	\$1,460	\$1,610	\$2,040	\$2,800	\$3,390
91906	\$1,180	\$1,300	\$1,650	\$2,260	\$2,740
91908	\$1,710	\$1,890	\$2,400	\$3,280	\$3,990

Fair Market Rent

Leasing	Rental Assistance
<ul style="list-style-type: none">• The amount of CoC Program funds used for leasing an individual unit may not exceed the current FMR for that unit size and location• FMRs do not impact the amount of funding used to lease a structure	<p>The amount of CoC Program funds used for rental assistance may exceed the current FMR for that unit size and location, as long as the contract rent is reasonable</p>

Rent Reasonableness

► Definition:

- Recipients/subrecipients of federal funds must offer reasonable rent in comparison to that paid for private units:
 - In a similar location
 - Of a similar size, quality, and age
 - Offering similar amenities and utilities

► Purpose:

- Rent reasonableness is designed to:
 - Ensure Fairness
 - Prevent Inflation



Determining Rent Reasonableness

- ▶ **Rent plus the cost of any utilities** that must, according to the lease, be the responsibility of the tenant.
- ▶ Recipients/subrecipients are responsible for determining what documentation is required in order to ensure that the rent reasonableness standard is met for a particular unit





Documenting Rent Reasonableness

▶ A project can determine rent reasonableness via:

- ▶ A market study of rents charged
 - ▶ A review of advertisements for comparable units
 - ▶ Written verification from a property owner or management company on letterhead affirming that the rent is comparable to that charged for similar unassisted units managed by the same owner
- ▶ Comparable rents vary over time, so ensure that the comparison is up-to-date and appropriate for each unit

See worksheet:

<https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>

Policies and Procedures

- ▶ Recipients and subrecipients must establish their own written policies and procedures for documenting comparable rents, including:
 - ▶ A methodology for documenting comparable rents
 - ▶ Case file checklists and forms
 - ▶ Standards for certifying comparable rents as reasonable
 - ▶ Staffing assignments
 - ▶ Strategies for addressing special circumstances
- ▶ Determination must be supported documentation in the case file



Rent Reasonableness: Leasing vs. Rental Assistance

Leasing	Rental Assistance
<ul style="list-style-type: none">• In communities where the FMR exceeds the reasonable rent, the reasonable rent is the ceiling for the amount of CoC leasing funds that can be used on a single unit• Thus, use of CoC Program leasing funds is capped at the lower of rent reasonableness or FMR amounts	<ul style="list-style-type: none">• The amount of CoC Program funds used for rental assistance may not exceed rent reasonableness• In communities where the reasonable rent is higher than the FMR, projects may use rental assistance funds to pay up to reasonable rent (so long as the project continues to serve the contracted number of participants for the remainder of the grant term)

Rent Limits in Leasing Projects

	1-Bedroom Unit	2-Bedroom Unit	3-Bedroom Unit
Reasonable Rent	\$850	\$1,325	\$1,700
Fair Market Rent	\$775	\$1,400	\$1,700
Allowable Rent Payment	?	?	?

Rent Limits in Leasing Projects

	1-Bedroom Unit	2-Bedroom Unit	3-Bedroom Unit
Reasonable Rent	\$850	\$1,325	\$1,700
Fair Market Rent	\$775	\$1,400	\$1,700
Allowable Rent Payment	\$775	\$1,325	\$1,700

Utilities:

- The FMR in each community assumes the provision of necessary utilities
- Eligible utilities include:
 - (1) gas/oil
 - (2) electricity
 - (3) water
 - (4) sewage
- Ineligible utilities include:
 - (1) telephone
 - (2) internet
 - (3) cable television





If rent includes utilities...

- CoC leasing funds can be used to pay the entire rent up to the FMR
- A utility allowance must be applied to the occupancy charge calculation if participants are expected to pay for utilities

If rent does not include utilities...

- Operating funds or occupancy charges can be used to pay for utilities
- Participants can be required to pay for utilities
- A utility allowance may be applied to the occupancy charge calculation

Recordkeeping Requirement

- ▶ Required for leasing and rental assistance projects
- ▶ Important to have both FMR and Rent Reasonableness
- ▶ Common findings or concerns:
 - ▶ Missing supporting documentation
 - ▶ Comparing units that are not similar
 - ▶ Incomplete forms

RENT REASONABLENESS CHECKLIST AND CERTIFICATION

	Proposed Unit	Unit #1	Unit #2	Unit #3
Address				
Number of Bedrooms				
Square Feet				
Type of Unit/Construction				
Housing Condition				
Location/Accessibility				
Amenities				
Unit:				
Site:				
Neighborhood:				
Age in Years				
Utilities (type)				
Unit Rent				
Utility Allowance				
Gross Rent				
Handicap Accessible?				

CERTIFICATION:

A. Compliance with Payment Standard

Proposed Contract Rent + Utility Allowance = Proposed Gross Rent

Approved rent does not exceed applicable Payment Standard of \$_____.

B. Rent Reasonableness

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] is [] is not reasonable.

☐ Supporting documentation for comparable units attached.

Fair Market Rent: [HTTPS://WWW.HUDUSER.GOV/PORTAL/DATASETS/FMR.HTML](https://www.huduser.gov/portal/datasets/fmr.html)
DATA FOR FAIR MARKET RENT SHOULD BE OBTAINED FROM THE ABOVE WEBSITE.

County unit is located: _____ Year: _____

Unit size: _____ Posted FMR for unit size: _____ Proposed unit rent: _____

Based upon current FMR, the proposed unit [] meets or [] exceeds the payment standard amount.

Name:	Signature:	Date:
-------	------------	-------

Break Time

- We will have a ten (10) minute break now.
- We will reconvene at 10:16.



Match

DEFINITION

AMOUNTS & CALCULATIONS

DOCUMENTATION & RECORDKEEPING



Definition of Match

To meet the **match requirement**, each recipient or subrecipient must:

- Match **all** grant funds (except for leasing funds)
- With **no less than 25%** of that funding
- In the form of **cash or in-kind contributions/services**
- On a **grant-by-grant basis**
- To be used on **eligible costs** of the project (as defined under Subpart D of the HEARTH Act)

578.73 Matching requirements.

Calculating Match: Example

	Project A	Project B
Leasing	---	\$90,000
Rental Assistance	\$90,000	---
Supportive Services	\$10,000	\$10,000
Administration	\$10,000	\$10,000
Subtotal (for Match)	?	?
25% Match	?	?

Calculating Match: Example

	Project A	Project B
Leasing	---	\$90,000
Rental Assistance	\$90,000	---
Supportive Services	\$10,000	\$10,000
Administration	\$10,000	\$10,000
Subtotal (for Match)	\$110,000	\$110,000-Leasing= \$20,000
25% Match	\$27,500	\$5,000

Eligible and Ineligible Sources for Match

Eligible Sources	Ineligible Sources
<ul style="list-style-type: none">• A recipient or subrecipient may use funds from any source, including any other federal sources (except for CoC Program funds), including from State, local, and/or private sources• The funds must not be statutorily prohibited from being used as match (the recipient or subrecipient must ensure that the rules governing use of the funds source allow the funding to be used as match for the CoC Program)	<p>Resources already used as match for another grant (no “double-dipping”)</p> <ul style="list-style-type: none">• Program participant resources (e.g., savings)• CoC Program funds• Funding sources that are prohibited from being used as match for the CoC Program

In-Kind Match

- A recipient or subrecipient **may use the value of any of the following** that are contributed to the project as match, provided that the costs would've been eligible under Subpart D of the HEARTH Act had the recipient or subrecipient had to pay for them with grant funds:
 - Real property
 - Equipment
 - Goods
 - Services (time, expertise, etc.)
- Note: In-kind match has special documentation requirements (discussed later)



Documenting Match

- ▶ All match must be documented, with cash match and in-kind match having separate requirements:
- ▶ Cash match requires a written commitment
- ▶ In-kind match requires a Memorandum of Understanding (MOU) which contains (at a minimum):
 - ▶ The unconditional commitment (except for selection to receive a grant);
 - ▶ The name of the project and the organization to which the contribution will be given;
 - ▶ The name of the organization providing the contribution;
 - ▶ The date or time period that the services will be available (which should match the grant's operating year);
 - ▶ The specific service to be provided;
 - ▶ The profession of persons providing services (if professional services are used as match);
 - ▶ The hourly cost of any services to be provided.
- ▶ Include a system to document the actual value of services provided during the grant term (such as fair market value or going rate).
- ▶ Be signed and dated by an authorized representative of the match source (and his/her name and title are clearly stated).

Recordkeeping Requirements

Apart from documenting match prior to grant agreement, the grantee must:

- ▶ Keep records of the source and use of contributions made to satisfy the match requirement (e.g., a general ledger), including that match was expended on eligible costs
- ▶ Indicate the grant and fiscal year for which each matching contribution is counted
- ▶ Show how the value placed on third-party in-kind contributions was determined:
 - ▶ To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs





► Amendments

TYPES OF CHANGES

PROTOCOL

CHECK FOR UNDERSTANDING



What's an Amendment?

- ▶ Whenever a change needs to be made to the CoC grant agreement, an amendment is triggered.
- ▶ Grant Amendments include a budget transfer of more than 10% (including budget cost element changes), CoC grant administration transfer, and a CoC program component change all require the formal amendment process.
- ▶ Budget Modifications include, a budget change of less than 10% budget line item, and do not require the formal amendment process, however notification to HUD is required. The HUD rep will make the necessary changes in LOCCS and these changes will be transferred to SAGE.

Grant Agreement Amendments are triggered when 10% or more is moved out of a Budget Line Item (BLI) and applied to another BLI.

For Grant Agreement Amendments, recipients must:

- ▶ Prepare a detailed, written request to the local HUD CPD Field Office
- ▶ Explain the reason for the change
- ▶ Certify same or better level of service will be provided
- ▶ Submit revised budgets as applicable
- ▶ Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

Important tip: You should discuss changes with your CoC so they can submit an accurate GIW to Washington each year at the beginning of the Competition. Most CoC's require this information.

Budget Modifications:

Minor changes

- ▶ For budget modifications -i.e., anything under 10%, the recipient must:
 - ▶ Fully document any changes
 - ▶ Notify the Field Office of the change so LOCCS and other reporting systems can be adjusted
 - ▶ Maintain documentation and make it available to HUD during monitoring and compliance reviews or upon request



Amendments Protocol

Changes to E-Snaps Screen c.1.9.b are done when:

- ▶ Moving funds between CoC budget line items.
- ▶ Adding funds to eligible costs not previously approved in your application.
- ▶ Changes in number of units/beds.

Important Tip: These changes will require HUD to issue an amended Grant Agreement. Please have a discussion with your CPD Representative if you would like to make one of these changes.

Amendments: Pop Quiz!

Moving funds from one approved eligible cost to another eligible cost that has not been approved:

Current grant agreement: \$30,000 in Supportive Services for

- ▶ Case Management - \$12,500
- ▶ Food - \$2,500
- ▶ Legal Services - \$15,000

And you want to switch it to

- ▶ Case Management - \$12,000
- ▶ Food - \$2,000
- ▶ Legal Services - \$12,000
- ▶ Life Skills - \$4,000 (Not previously included in your application.)

Does this require an amendment? or a budget modification?

Amendments: Pop Quiz!

Q: Does this require an amendment or a budget modification?

A: A Budget Modification

In this case, even though the overall budget for supportive services is still \$30,000, you have added an eligible cost that was not previously in your application, therefore not approved by HUD, and you need to let us know about it. Otherwise, once the Agency submits the APR, this amount (\$4,000 in the example above) is subject to repayment.

Amendments Key Points

When are you required to notify HUD about grant amendments and/or budget modifications?

- ▶ Always *before* you make the changes! However, the level of notification changes depending on the circumstances.
- ▶ If you are moving money from one CoC budget line item to another (e.g. money from Operating Costs to Supportive Services, or to Leasing), then you need to notify HUD via official notification (i.e. Signed letter).
- ▶ If you are moving money from one approved cost element to another cost element that has not been approved (i.e. is not in your original application), then you need to notify HUD via official notification.
- ▶ If you are moving money from one approved cost element to another approved cost element, then you do not need to send an official letter but you must send your HUD Representative an email notifying the changes. (Note: In some cases, if the changes are substantial, we might require an official notification.)
- ▶ For example: Changing number of beds/units (increasing/decreasing)
- ▶

Amendments Key Points (Cont.)



► What is the deadline to make budget corrections on grants about to expire? **90 days prior** to expiration date. But CPD Reps have the right to accept requests beyond the deadline. (On a case-by-case basis.)

► How many amendments can be done per year?

We received guidance to limit amendments to no more than 1 per year.

► **Disclaimer:** The CPD Director reserves the right to reject an amendment.



▶ Record Keeping

Reasons to Document

- ▶ **Reimbursement:** HUD will only reimburse projects for CoC funds spent on eligible activities for eligible persons
- ▶ **Reporting:** Proper documentation will help you with completing the Annual Performance Report due 90 days after operating period ends.
- ▶ **Monitoring :** HUD periodically monitors grantees to ensure compliance with applicable laws and regulations and to ensure program effectiveness and efficiency.



Record Keeping Requirements

- ▶ 24 CFR 578.103 is the primary source for record keeping requirements, as well as the NOFA that funded the project.
- ▶ Always keep clean and detailed records on the following topics:

Program Participants	Program Components	Eligible Costs
Project Progress	Match Documentation	Subrecipient Management
Recipient Management	Financial Management	Cost Allowability
Procurement	Equipment and Equipment Disposition	Other Federal Requirements

[eCFR :: 24 CFR 578.103 -- Recordkeeping requirements.](#)

A close-up, slightly blurred photograph of a person's hands writing in a spiral-bound notebook with a silver pen. The person is wearing a white long-sleeved shirt. The background is out of focus, showing a desk and some papers.

Record Keeping: Grantee Responsibility

- ▶ Grantees must ensure that:
 - ▶ Funds are spent only on **eligible participants**
 - ▶ Funds are spent only for **eligible activities and allowable costs**
 - ▶ Funds are committed and **expended within prescribed deadlines**
 - ▶ The use of funds is supported by the **required documentation**
 - ▶ Policies and procedures are **consistent with all applicable federal, local, or grant-specific requirements**

Additional Considerations



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



Record 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
- ▶ Acquisition, new construction, or rehabilitation records must be retained for 15 years after the date the project site is first occupied

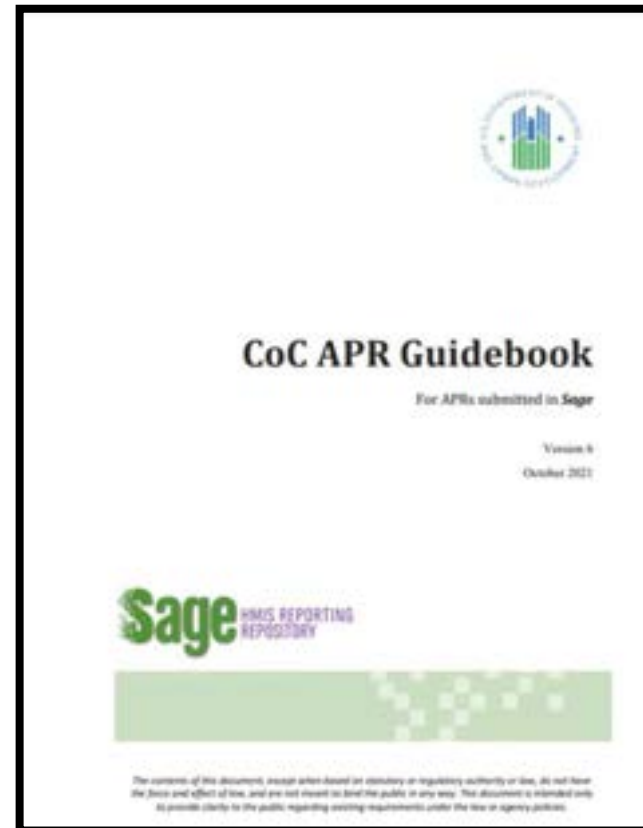
Annual Performance Report

WHAT HUD LOOKS FOR
MOST COMMON ISSUES

Grantee APR Review Guidebook

<https://files.hudexchange.info/resources/documents/sage-coc-apr-guidebook-for-coc-grant-funded-programs.pdf>

Latest Version: October 2021



What HUD looks for:

An APR Submission needs to meeting the following requirements:

- ▶ Timeliness
 - ▶ Timely Submission
- ▶ Bed/Unit Utilization Rate
 - ▶ National Benchmark:
 - ▶ TH – 80%,
 - ▶ PH – 85%
- ▶ Program Eligibility
 - ▶ Client are eligible to receive assistance under HUD's definition of homelessness
- ▶ Financial
 - ▶ 25% match requirement met
 - ▶ LOCCS and APR column match

Common Issues: Low Bed/Unit Utilization Rate

- ▶ **Bed/Unit Utilization Rate:** National Benchmark: TH - 80%, PSH - 85%.
- ▶ If you don't meet this rate, you must provide an explanation in the comments section.
- ▶ If an explanation is not provided, the APR will be rejected.

Bed and Unit Inventory

Proposed to Actual Inventory

Reviewer note: If the proposed inventory is blank it was not received by Sage from e-snaps. The reviewer should check the application in e-snaps. Thus, the reviewer will need to calculate the percentages themselves.

	As Proposed in the Application Total	Occupied AND Available for Occupancy As Completed in the APR by the Recipient				Average % of Actually Available to Proposed
		January	April	July	October	
Units	8	8	8	8	8	100.00%
Beds	12	12	12	12	12	100.00%

Persons/Households Relative to Available Inventory

Reviewer note: This inventory compares the number of units and beds actually available on the last Wednesday of the month to the number of households and beds come from the recipient's completion of the bed/unit inventory in the APR and the number of persons served comes from the CSV

	Actual Beds	Persons Served	Utilization (Persons Served / Actual Beds)
January	12	10	83.33%
April	12	10	83.33%
July	12	10	83.33%
October	12	10	83.33%

Common Issues: Clients Coming from Other Locations

Program Eligibility

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Homeless Situations					
Emergency Shelter	4	4	0	0	0
Transitional Housing	3	3	0	0	0
Place not Meant for Human Habitation	2	1	1	0	0
Safe Haven	0	0	0	0	0
Interim Housing					
Institutional Settings	0	0	0	0	0
Other Locations 	1	1	0	0	0
Total	10	9	1	0	0


Program Eligibility: If they are a DV survivor coming from other locations, you must provide an explanation of this in the **comments section**.

NOTE: APRs is a reporting tool only. If you have questions about client eligibility, work with your CPD Rep outside of Sage to ensure you are in compliance with client eligibility.

Common Issues: Financial

Financial

Reviewer notes: 1. Grants fulfilling a use restriction (indicated by -CC after the grant number) and SRO's do not have financial information reported; 2. LOCCS data is transmitted weekly to S APR expenditures do not match the dollars reported in the LOCCS draw the reviewer should check the LOCCS system prior to returning the APR to the recipient; 3. Real Property Leasing do

	eSNAPS Amount Awarded	Amended Budget	LOCCS Drawn	APR
Development	\$0	\$0	\$0	\$0
Supportive Services	\$8,333.00	\$8,333.00	\$8,333.00	\$8,333.00
Operating	\$93,566.00	\$93,566.00	\$93,566.00	\$93,566.00
Leasing	\$0	\$0	\$0	\$0
Rental Assistance	\$0	\$0	\$0	\$0
HMIS	\$0	\$0	\$0	\$0
Admin	\$9,577.00	\$9,577.00	\$9,577.00	\$9,577.00
CoC Planning (UFA only)	\$0		\$0	
UFA Costs	\$0		\$0	
Total	\$111,476.00	\$111,476.00	\$111,476.00	\$111,476.00
Difference between APR Total and LOCCS Total				\$0

difference should
always be zero

Financial: The APR and LOCCS column must match. Please consult with your accounting/finance department to verify financials.

Remember: The last voucher must be submitted within 90 days of the end of the grant period. Your last voucher should be submitted BEFORE you submit your APR.

HOW TO REDUCE APR REJECTIONS

- ✓ **Include comments in your initial submission!!**
 - ✓ If your actual inventory is less than 100%, include a comment explaining why.
 - ✓ If your households/persons served is under the national benchmarks, include a comment explaining barriers encountered.
 - ✓ If clients the CSV Upload as coming from “Other Locations”, add comments explaining eligibility.



► Monitoring

EXHIBITS

CPD MONITORING HANDBOOK

Annual Monitoring

- ▶ Every fiscal year, each CPD Field Office is responsible for developing an office work plan with monitoring strategies encompassing CPD grantees and programs to be monitored.
- ▶ A complete range of all CPD programs are reviewed in the analysis for selection for monitoring
- ▶ Program risks are identified, ranked, and specific monitoring objectives are developed.



A photograph of several white paper cutouts of human figures holding hands in a line, set against a green background. The figures are slightly out of focus, with the one in the foreground being sharper.

Monitoring Exhibits

- ▶ HUD utilizes the CPD Monitoring Handbook to conduct monitoring sessions.
- ▶ This handbook is made available to the public and the monitoring exhibits identify the questions HUD will ask the recipient during the monitoring session.
- ▶ Each exhibit question refers directly to the program regulations.
- ▶ HUD recommends recipients to review the monitoring handbook.

hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

CPD Systems Training HR & Pay CDBG Federal Systems

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CPD MONITORING HANDBOOK (6509.2)

This transmits CHG-2 to REV-7 of the *CPD Monitoring Handbook 6509.2*. The primary purpose of this revision is to incorporate the Community Compass Technical Assistance and Capacity Building Program (TA) into this Handbook. TA Program and its related exhibits are incorporated into Chapter 17. Updates to Chapter 1 and 2, and Exhibit 2-2 also reflect applicability to the TA Program. Further, Chapter 23 was updated to exclude the TA Program and to update the name of HUD office overseeing Chapter 23 requirements.

Transmittal: Revision 7 CHG -3	PDF	WORD
Transmittal: Revision 7 CHG -2	PDF	WORD
Table of Contents	PDF	WORD
Cover Page		WORD
CHAPTER 1: INTRODUCTION	PDF	WORD
CHAPTER 2: MANAGEMENT OF MONITORING ACTIVITIES	PDF	WORD
Exhibit 2-1 - CPD Monitoring Summary Form		WORD



- Search CPD Monitoring Handbook

CHAPTER 29: CONTINUUM OF CARE (CoC) PROGRAM	WORD
Exhibit 29-1 - Guide for Review of Homeless and At-Risk Determination/Recordkeeping Requirements	WORD
Exhibit 29-2 - Guide for Review of CoC Collaborative Applicant Responsibilities	WORD
Exhibit 29-3 - Guide for Review of CoC Recipient Overall Grant Management	WORD
Exhibit 29-4 - Guide for Review of CoC Subrecipient Grant Management	WORD
Exhibit 29-5 - Guide for Review of CoC Rapid Rehousing Requirements	WORD
Exhibit 29-6 - Guide for Review of CoC Safe Haven Requirements	WORD
Exhibit 29-7 - Guide for Review of CoC Permanent Supportive Housing Requirements	WORD
Exhibit 29-8 - Guide for Review of CoC Supportive Services-Only Requirements	WORD
Exhibit 29-9 - Guide for Review of CoC Transitional Housing Program Requirements	WORD
Exhibit 29-10 - Guide for Review of CoC Homeless Management Information System (HMIS) Requirements	WORD
Exhibit 29-11 - Guide for Review of CoC Match Requirements	WORD
Exhibit 29-12 - Guide for Review of CoC Financial Management and Cost Allowability	WORD
Exhibit 29-13 - Guide for Review of CoC Procurement Requirements	WORD
Exhibit 29-14 - Guide for Review of CoC Equipment and Equipment Disposition Requirements	WORD

► Exhibit 29: Continuum of Care Program

Exhibit 29-5 Continuum of Care (CoC) Program		6509.2 REV-6 CHG-2			
Guide for Review of CoC Rapid Rehousing Requirements					
Name of Recipient:					
Name of Subrecipient(s):					
Grant Number:					
Project Name:					
Staff Consulted:					
Name(s) of Reviewer(s)		Date			
<p>NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must select "NO" in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "Finding."</p> <p>Instructions: This Exhibit is designed to assess the recipient's compliance with the Rapid Rehousing program component of the Continuum of Care (CoC) Program. Rapid rehousing is a form of permanent housing that is short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in 24 CFR 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. Each project still has to not only follow the CoC program rules, but also the rules under the Notice of Funds Availability (NOFA) under which it was awarded. This Exhibit should be used in conjunction with all other Exhibits relevant to the project being monitored. The Exhibit is divided into three sections: Homeless Status and Eligibility Determination; Component-Specific Requirements; and Eligible Costs.</p> <p>Questions:</p> <p>A. HOMELESS STATUS AND ELIGIBILITY DETERMINATION</p> <p>1. Did the recipient determine whether program participants' eligibility was adequately documented in terms of their homeless status upon entry into the program?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"> <p>NOTE: The HUD reviewer MUST complete Exhibit 29-1, <i>Guide for Review of Homeless and At-Risk Determination Recordkeeping Requirements</i>, to answer this question.</p> <p>[24 CFR 578.103]</p> <p>Describe Basis for Conclusion:</p> </td> <td style="width: 20%; text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </td> </tr> </table>				<p>NOTE: The HUD reviewer MUST complete Exhibit 29-1, <i>Guide for Review of Homeless and At-Risk Determination Recordkeeping Requirements</i>, to answer this question.</p> <p>[24 CFR 578.103]</p> <p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>NOTE: The HUD reviewer MUST complete Exhibit 29-1, <i>Guide for Review of Homeless and At-Risk Determination Recordkeeping Requirements</i>, to answer this question.</p> <p>[24 CFR 578.103]</p> <p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
<p>2. Did the recipient and its subrecipients meet the requirement to assess the participants to ensure eligibility criteria established by NOFA in the year of original award (e.g., the household was residing in a place not fit for human habitation, in an emergency shelter, or fulfilled the criteria for chronic homelessness) was met?</p> <p>[NOFA for FY 2014 or FY 2013-2014; 24 CFR 578.103(a)(3)]</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"> <p>Describe Basis for Conclusion:</p> </td> <td style="width: 20%; text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </td> </tr> </table>				<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
<p>B. COMPONENT-SPECIFIC REQUIREMENTS</p> <p>3. Did program participants who were receiving rapid re-housing assistance have a signed lease agreement of at least 1 year that was renewable (for a minimum term of 1 month) and terminable only for cause?</p> <p>[Definition of permanent housing in 24 CFR 578.3; 24 CFR 578.103(a)(17)]</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"> <p>Describe Basis for Conclusion:</p> </td> <td style="width: 20%; text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </td> </tr> </table>				<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
<p>4. a. Did the CoC establish a system for prioritizing persons for RRM?</p> <p>b. If so, did the recipient and its subrecipients comply with the written policies and procedures established by the CoC for determining and prioritizing which families and individuals would receive rapid rehousing assistance?</p> <p>c. Did the recipient and its subrecipients comply with the written policies established by the CoC on the amount (or percentage) of rent that each program participant must pay?</p> <p>[24 CFR 578.37(a)(1)(ii)(A); 24 CFR 578.103(a)(17)]</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"> <p>Describe Basis for Conclusion:</p> </td> <td style="width: 20%; text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </td> </tr> </table>				<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
<p>5. Did the recipient and its subrecipients meet the requirement to expend grant funds for only supportive services, tenant-based rental assistance, administration, or relocation, and only if the grant agreement provided funds for those costs?</p> <p>[24 CFR 578.37(a)(1)(vi)]</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"> <p>Describe Basis for Conclusion:</p> </td> <td style="width: 20%; text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </td> </tr> </table>				<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				

- ▶ Did program participants who were receiving rapid re-housing assistance have a lease **of at least 1 year** that was renewable (for a minimum term of 1 month) and terminable only for cause?
- ▶ Did the recipient and its subrecipients comply with the **written policies and procedures** established by the CoC for determining and prioritizing which families and individuals would receive rapid rehousing assistance?
- ▶ Did the recipient and its subrecipients comply with **the written policies established by the CoC** on the amount (or percentage) of rent that each program participant must pay?
- ▶ Did the recipient and its subrecipients meet the requirement to expend grants funds for only supportive services, tenant-based rental assistance, administration, or relocation, and **only if the grant agreement provided funds for those costs**?
- ▶ Did the recipient and its subrecipients meet the requirement that program participants **receive supportive services for no more than 6 months** after rental assistance ended?
- ▶ Were the program **participants re-evaluated not less than once annually** to determine if they lacked sufficient resources and support networks to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing?
- ▶ Does the project require participants **to meet with a case manager at least once per month** to assist the participant in ensuring long-term housing stability

Monitoring Exhibit 29-5: Review of CoC Rapid Rehousing Requirements



Written Intake Policy and Procedures

- ▶ Some areas to focus on:
 - ▶ Homelessness documentation
 - ▶ HUD's order of priority
 - ▶ Disability documentation (if applicable)
 - ▶ Housing Choice
 - ▶ HQS Inspections
 - ▶ Rent Reasonableness
 - ▶ Income Calculations
 - ▶ Rent Calculations
 - ▶ Lead Based Paint Inspections

*If the recipient does not have its own CoC policy and procedures, it may adopt CoC-wide policy and procedures, however there must be documentation guiding staff of this.

NAVIGATING THROUGH

HUD EXCHANGE


HUD Exchange FAQ

Resources and assistance to support HUD's community partners

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Resource Library



Explore featured publications and browse regulations, policy guidance, toolkits, and other resources.

FAQ Collections



Find answers to frequently asked questions.

RHP | FEB 17 Recovery Housing Program Website and Program Support Now Available

HOUSING COUNSELING PROGRAM | FEB 17 FHA Extends Foreclosure and Eviction Moratoria and Expands Temporary COVID-19 Forbearance and Servicing Policies

https://www.hudexchange.info/resources/

1:59 PM 2/24/2021

HUD Exchange FAQ

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Home - FAQs

Frequently Asked Questions

Find answers to frequently asked questions grouped by programs, systems, and related topics.

Search FAQs by keyword

FAQ Collections

FAQ 811 Project Rental Assistance	FAQ AFFH: Affirmatively Furthering Fair Housing	FAQ CDBG Entitlement Program
FAQ CoC: Continuum of Care Program	FAQ DCTA: Distressed Cities Technical Assistance	FAQ DRGR: Disaster Recovery Grant Reporting System
FAQ eCon Planning Suite	FAQ Environmental Review	FAQ ESG: Emergency Solutions Grants Program

Windows taskbar: 2:01 PM 2/24/2021

HUD Exchange FAQ

The screenshot shows the HUD Exchange website interface. At the top, there is a dark blue header with the HUD Exchange logo and navigation links: My HUD Exchange, Programs, Resources (highlighted), Trainings, Program Support, Grantees, and News. A red arrow points to the 'Resources' link. Below the header, the breadcrumb trail reads 'Home > Programs > CoC > CoC FAQs'. The main content area is titled 'CoC FAQs' and includes an 'Export (pdf)' button. On the left, a 'Filters' sidebar contains a 'FAQ Keyword Search' field, a 'Related Programs and Systems' section with a 'HHS' link, and a 'Topics' list with expandable items: Activity, Permanent Supportive Housing, Rental Assistance, Cross Cutting Requirements, Environmental Review, and Program Management. A red speech bubble with the text 'You can filter based on topics' points to the 'Topics' list. The main content area displays 'FAQs' and 'Viewing 18 of 18 FAQs'. The first FAQ is titled 'Do I have to complete the whole Final CoC Self-Rating survey or just update certain indicators?' with a date of April 2012. The second FAQ is 'How do CoC stakeholders access the CoC Self-Assessment?' with a date of November 2011. The third FAQ is 'Will CoCs be able to choose a Group of individuals (like a regional group) to complete the Check-up as ONE respondent?' with a date of November 2011. The Windows taskbar at the bottom shows various application icons and the system clock indicating 2:06 PM on 2/24/2021.

Resources and assistance to support HUD's community partners

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Home > Programs > CoC > CoC FAQs

CoC FAQs Export (pdf)

Filters

FAQ Keyword Search:

Keywords

Related Programs and Systems:

Instructions: To narrow search results you may select from one of the following programs or systems.

HHS

Topics:

- Activity
- Permanent Supportive Housing
- Rental Assistance
- Cross Cutting Requirements
- Environmental Review
- Program Management

FAQs Viewing 18 of 18 FAQs

Topic/Subtopic: CoC Check-up

Do I have to complete the whole Final CoC Self-Rating survey or just update certain indicators?

Date Published: April 2012

Yes, the whole Final CoC Self-Rating must be completed by each CoC. The final CoC Self-Rating is not the same as the CoC Lead rating provided during stage 1 of the CoC Check-up process. The self-rating survey represents the ratings for each indicator that the CoC lead decision-making group believes best reflect the CoC's performance. ...

How do CoC stakeholders access the CoC Self-Assessment?

Date Published: November 2011

CoC stakeholders who are invited to complete the assessment will receive an email with a link to the survey from their CoC Lead. If the respondent does not complete the survey in one session they will use the same link to re-enter the site. The system will bookmark where they stopped the survey and when they reenter they will be taken to that page.

Will CoCs be able to choose a Group of individuals (like a regional group) to complete the Check-up as ONE respondent?

Date Published: November 2011

Yes, this is the CoC's tool. Please remember that there is a minimum requirement of 6 respondents in order to complete the Check-up. Four of the respondent types must be the CoC Lead, HHS Lead, ESG/HRP Grantee, and one CoC Provider.

Related Programs and Systems: HHS

2:06 PM 2/24/2021

SNAPS Office Hours

Resources and assistance to support HUD's community partners

HUD EXCHANGE

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Home > News > Office Hours: COVID-19 Planning and Response for Homeless Assistance Providers - Fridays at 2:30 PM EST

February 22, 2021 [Print](#) [Share This](#)

HUD's Office of Special Needs Assistance Programs (SNAPS) invites homeless assistance providers and their partners to participate in weekly Office Hours to discuss COVID-19 planning and response on **Fridays from 2:30 - 4:00 PM EST**. Presenters from the following federal agencies and their partners will be available for a live question and answer session:

- Centers for Disease Control and Prevention (CDC)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs (VA)
- National Healthcare for the Homeless Council (NHC)

Join Friday's Office Hours

Date and Time: Friday, February 26, 2021 at 2:30 PM EST

Participants do not need to register in advance. It is strongly recommended that you join the Office Hours 15 minutes prior to the start time (2:15 PM EST). To join the Office Hours, simply access the login page at the link below.

[Join the Office Hours on Friday, February 26, 2021](#)

Previous Office Hours Recordings and Slides

If you participated in previous Office Hours, you are still encouraged to attend future Office Hours for the latest information and updates. [View the recordings and slides from previous Office Hours.](#)

Questions?

If you have any questions about this Office Hours or encounter difficulties joining the Office Hours, please contact Thomas_Bednar@abkxosoc.com.

Additional Resources

CoC Binders

- ▶ Eligible Activities
- ▶ Environmental Review
- ▶ Financial Management
- ▶ Grant Administration
- ▶ Homeless Eligibility
- ▶ Leasing and Rental Assistance
- ▶ Match
- ▶ Program Components
- ▶ Rent Calculation



<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/>

HUD No Longer Using HUD Exchange for HUD-Issued Program/Competition Information

HUD's Office of Special Needs Assistance Programs (SNAPS) will use two different listservs on HUD's website to communicate information regarding information developed by HUD/SNAPS concerning:

- Continuum of Care (CoC) Program;
- Emergency Solutions Grant (ESG) Programs;
- Youth Homelessness Demonstration Program (YHDP);
- Other Notices of Funding Opportunity (NOFO) developed by SNAPS; and
- Any other information related to SNAPS programs and the work to end homelessness.

Information and guidance produced by HUD technical assistance providers regarding SNAPS programs remains on the HUD Exchange and new information will continue to appear. But documents and communication written by SNAPS will no longer be sent through the HUD Exchange listserv.

To subscribe to the SNAPS Competitions listserv please click on [the link](#)

To subscribe to the SNAPS Program Information listserv please click on [the link](#)

Q&A

Contact your CPD Rep

- Eunice Cho Eunice.Cho@hud.gov
- Cynthia Blatt Cynthia.J.Blatt@hud.gov

THANK YOU!

- This PowerPoint presentation and a resource list of all links discussed will be emailed to you.
- You will also be emailed a survey. We covered a lot of topics today and we want to learn from you what future trainings you would like to see from HUD staff.

