

Policy Checklist for the Continuum of Care (CoC) Program

This Policy Checklist was developed in an effort to assist homeless providers to proactively implement its FY __CoC grant(s) in compliance with applicable regulations codified at 24 CFR Part 578.

Grant recipients are encouraged to use and update this checklist annually to prepare for Annual Performance Review (APR) submittal and for monitoring by HUD.

Grantee Name: _____

Project Name: _____ Grant Term: _____

Grant Number: _____ Grant Amt.: _____ Expiration Date: _____

Date APR is Due to HUD: _____ Date APR Submitted: _____

(Not more than 90 days after the end of each CoC grant's performance period)

General Recordkeeping

- ___ 1. Executed Grant Agreement
24 CFR 578.23(c)
- ___ 2. Documentation of Grant Amendment (request and approval, if applicable)
24 CFR 578.105
- ___ 3. Executed Grant Agreements with Subrecipients
24 CFR 578.23(c)(ii)
- ___ 4. Documentation subrecipients are not debarred
24 CFR 578.23(c)(4)(v)
- ___ 5. Documentation of annual monitoring of Subrecipients
24 CFR 578.23(c)(8)
- ___ 6. Executed Memorandum of Understanding with Service Providers
24 CFR 578.73(c)(3)
- ___ 7. Project Application should be maintained - ensure costs charged against the grant are consistent with the approved budget items identified in the application
24 CFR 578.59(a)
- ___ 8. Documentation that Annual Performance Report was submitted timely
24 CFR 578.103(e)
- ___ 9. Written CoC Program Policies and Procedures to include:
24 CFR 578.103(a)
 - ___ Intake/screening procedures
24 CFR 578.103(a)(3)and(4)

- ___ Personnel Policies and Procedures
2 CFR 200.303, and 24 CFR 578.103(a)
- ___ Termination Policy
24 CFR 578.91
- ___ Grievance Policy
24 CFR 578.91
- ___ Policy Privacy/Confidentiality Policy
24 CFR 578.103(b)
- ___ Drug-Free Workforce Policy
24 CFR 5.105(d), 24 CFR 2424, 24 CFR 225
- ___ Policy identifying the involvement of homeless/formerly homeless individuals
24 CFR 578.23(c)(3)
- ___ Domestic Violence Policy
24 CFR 578.23(c)(4)(i)(ii), 24 CFR 578.103(a)(17)
- ___ Housing First Policy, if applicable
HUD CPD Notice 14-02
- ___ 10. Documentation of participation of homeless/formerly homeless individuals in policymaking
24 CFR 578.75(g)(1)
- ___ 11. Documentation of compliance with environmental review requirements
24 CFR 578.99, 24 CFR 578.31
- ___ 12. Documentation of compliance with fair housing requirements
24 CFR 578.87(b), 24 CFR 578.103(a)(14) and (17), 24 CFR 578.93(c)(1)
- ___ 13. Documentation of compliance with the Equal Access Rule maintained for 5 years
24 CFR 5. 106 (d)
- ___ 14. Documentation of other requirements (i.e. lead based paint, Section 3, Section 504), if applicable
24 CFR 578.99, 24 CFR 35, 24 CFR 578.99(b)

Financial Files

- ___ 1. Written Financial Policies
2 CFR 200.302, 24 CFR 578.23(c)(5), 24 CFR 578.103(a)
- ___ 2. Written Procurement Procedures
2 CFR 200.318 and 2 CFR 200.319
- ___ 3. Written Conflicts of Interest Policy
2 CFR 200.317 and 2 CFR 200.318, 24 CFR 578.95(a)
- ___ 4. Documentation of match (25% of total Grant Amount less leasing)
24 CFR 578.73(a)
- ___ 5. Documentation of Grant Expenditures (during grant term and for approved items in application)
24 CFR 578.37, 24 CFR 578.103
- ___ 6. Documentation of Indirect Cost Rate Proposal, if applicable
24 CFR 578.63(b), 24 CFR 578.103(a)(17)

- ___7. Documentation showing compliance with the Single Audit Act
24 CFR 578.99(g), 2 CFR 200 subpart F
- ___8. Documentation showing quarterly draw requests
24 CFR 578.85(c)(3)
- ___9. Documentation showing program income was expended prior to HUD draw requests, if applicable
24 CFR 578.97(b)
- ___10. Documentation of budget adjustments or grant amendments

Participant Program Files – For each individual/household

- ___1. Documentation participants are entered into HMIS or a comparable database
24 CFR 578.103(a)(3)
- ___2. Documentation participant was screened via centralized or coordinated assessment systems
24 CFR 578.23(c)(9)
- ___3. Documentation of Homelessness at intake
24 CFR 578.103(a)(3)
- ___4. Permanent Supportive Housing -Documentation of disability
24 CFR 578.37(a)(i)
- ___5. Transitional Housing- No more than 24 months of services provided except under documented extenuating circumstances
24 CFR 578.79
- ___6. Documentation of ongoing assessment of services
24 CFR 578.75(e)
- ___7. Documentation of examination of income (initial and recertification)
24 CFR 578.103(a)(7)(i)
- ___8. Documentation of initial and follow-up Housing Quality Standards inspections
24 CFR 578.75(b)(2)
- ___9. Leasing-Documentation that the unit/structure is not owned by recipient or subrecipient
24 CFR 578.49(a)
- ___10. Leasing-Documentation lease is between agency and landlord? Tenant agreement?
24 CFR 578.49(b)(5)
- ___11. Leasing-Is there an occupancy agreement, lease or sublease in the file (for individual units)?
24 CFR 578.103(a)(17)
- ___12. Leasing-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.49(b)(1)
- ___13. Rents charged (including utilities) do not exceed HUD-Fair Market Rents
24 CFR 578.49(b)(2)
- ___14. Documentation supporting the correct/current utility allowance schedule is used
24 CFR 578.103(a)(17), 24 CFR 578.49(a)(3)

- ___ 15. Leasing-Documentation of occupancy charges with annual income calculations
24 CFR 578.77, 24 CFR 578.99(b)(6)
- ___ 16. Rental-Documentation the participant has a an executed lease agreement with the landlord
24 CFR 578.77, 24 CFR 578.51(d)(e)
- ___ 17. Rental-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.51(g)

COVID Waivers (2020-2023) example from Sept. 2021)

- ___ 1. Self certification of income without 3rd party documentation
24 CFR 578.103(a)(7) iv
- ___ 2. Housing Quality Standards – Initial Inspection
24 CFR 578.75 (b) (1)
- ___ 3. Suitable Dwelling Size
24 CFR 578.578.75 (b) and (c), and 24 CFR 982.401 (d)(2)(ii)
- ___ 4. Coordinated Entry Annual Stakeholder Consultation
24 CFR 578.7 (a) (8) and CPD 17-01 Section 11.B.15
- ___ 5. Homeless Definition – Institutional Stay increased to 120 days
24 CFR 578.3 (1) (iii)
- ___ 6. Assistance Budget at Time of Renewal
24 CFR 578.33 (c)
- ___ 7. Permanent Housing / Rapid Rehousing Monthly Case Management
24 CFR 578.37(a) (1) (ii) (F)
- ___ 8. Fair Market Rent and Leasing Costs – not capped at FMR
24 CFR 578.49 (b) (2)
- ___ 9. Disability Documentation – PSH – Additional Evidence Not Required
24 CFR 578.103 (a) (4)(i) (B)
- ___ 10. One-Year Lease Requirement
24 CFR 578.3 and 24 CFR 578)(1) (1)
- ___ 11.

Additional Regulatory Resources

- ___ A. **24 CFR 578 HEARH Act Interim Rule (amended 2017)**
- ___ B. **CPD Monitoring Handbook 6509.2 REV 7 _CHG 4 - June 2022**
<https://www.hud.gov/sites/dfiles/OCHCO/documents/65092C2.pdf>
- ___ C. **HUD Exchange Virtual Binders**
<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/>
- ___ D. **Equal Access Rule Recordkeeping Requirements 24 CFR 5.106(d)**

This index should be maintained in the applicable CoC project files or central policy reference

documents binder.