

RHODE ISLAND

CoC Recipient Toolkit

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Created by The Technical Assistance Collaborative for the Rhode Island Continuum of Care under a cooperative agreement with the U.S. Department of Housing and Urban Development.



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Introduction to this CoC Recipient Guide

The *Rhode Island CoC Recipient Toolkit* provides CoC Program Recipients and those who anticipate becoming a recipient with an overview of the requirements of the CoC Program, links to key resources, and sample templates and tools to meet these federal financial management requirements and CoC program expectations and requirements.

Resources

All CoC Program funds originate from HUD, and HUD regulations govern operation of programs funded by the CoC Program. Key resources for HUD regulations and guidance interpreting the regulations are:

- CoC Program Interim Rule, 24 C.F.R. Part 578, available at <http://www.onecpd.info/resources/documents/CoCProgramInterimRule.pdf>
- Homeless Definition Final Rule, 24 C.F.R. Parts 91, 582 and 583, available at http://www.onecpd.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf
- HUD Ask-a-Question resource: <http://www.onecpd.info/get-assistance/my-question>
- SNAPS Homeless email notification list: <http://icfi.us5.list-manage.com/subscribe?u=87d7c8afc03ba69ee70d865b9&id=f32b935a5f>. Recipients should make sure that staff working on the CoC Program either in a programmatic or administrative way are signed up for the SNAPS Homeless email notification list.

In addition to these resources, HUD publishes additional materials that can be beneficial to recipients including:

- HUD's CoC monitoring guidance: <https://www.hudexchange.info/programs/cpd-monitoring/#coc>
- HEARTH: Defining "Chronically Homeless" Final Rule provides information needed to assess the accuracy of recordkeeping (not relevant for assessing program participant eligibility). <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>
- CoC Program Start Up Trainings provides an understanding of the requirements and responsibilities related to operations and grant administration. <https://www.hudexchange.info/trainings/courses/coc-program-start-up-training-webinars-for-fy-2013-funds1/>
- CoC Program Grants Administration Guide provides recipients with assistance in administering their project, including a comprehensive discussion of grant administration requirements. <https://www.hudexchange.info/resource/2946/coc-program-grants-administration-user-guide/>
- CoC FAQs provides the latest guidance on topics that have triggered questions among those operating the program. <https://www.hudexchange.info/coc/faqs/>

Section 1: Program Components and Eligible Costs

Program Components

Under the CoC Program, funds may be used to support eligible activities under five program components. These include:

- **Permanent Housing (PH):** community-based housing without a designated length of stay. To be considered permanent housing, the program participant must be the tenant on the lease (or sublease) for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminated only for cause. A lease is different from a program agreement that the recipient may have with the participant. There are two types of PH:
 - **Permanent Supportive Housing (PSH):** provides long-term assistance to individuals and families with a disability. Long-term assistance means that housing assistance lasts for over 24 months, does not have a designated end date, and is provided until the program participant chooses to exit the project or is terminated from the project. Supportive services designed to meet the needs of program participants must be provided
 - **Rapid Re-Housing (RRH):** provides short- (1 to 3 months) and/or medium-term (4 to 24 months) rental assistance and/or supportive services to program participants in housing that is intended to be permanent—meaning the program participant stays in the unit after the CoC Program assistance ends.
- **Transitional Housing (TH):** designed to facilitate the movement of homeless individuals and families to permanent housing within 24 months. Under the CoC Program, all program participants must have a signed lease, sublease, or occupancy agreement for a term of at least one month and extending no longer than 24 months which can be extended on a case-by-case basis only if permanent housing for the individual has not been located or if the individual or family requires additional time to prepare for independent living.
- **Supportive Services Only (SSO):** allows recipients and subrecipients to use CoC Program funding to provide services to homeless individuals and families for whom the recipient or subrecipient is not providing housing or housing assistance. SSO includes street outreach
- **HMIS:** only for CoC-designated HMIS Leads to manage, operate, upgrade, or customize the CoC's HMIS
- **Homelessness Prevention (HP)** – Note that Homelessness Prevention is only allowed for CoCs that are designated as by HUD to be a High Performing Communities. RICOc has not been designated a High Performing Community by HUD.

Each CoC Program grant can only be one of these program components. Recipients must know which component their grant has been awarded under.

Eligible Costs

CoC Program funds can be used to support eligible costs. The following summarizes the eligible costs under each Budget Line Item.

- **Acquisition:** The cost of acquiring property for the provision of one or more structures for housing or the delivery of supportive services

- **Rehabilitation:** The cost of rehabilitation of structures to provide housing or the delivery of supportive services
- **New construction:** The cost of new construction to be used as housing, including the building of a new structure or construction of an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land associated with that construction
- **Leasing:** The costs of leasing a structure or part of a structure in which supportive services or housing are provided to homeless persons
- **Rental assistance:** Rental assistance for homeless individuals and families provided on a short-, medium-, or long-term basis.
- **Supportive services:** The costs of eligible supportive services that address the special needs of program participants
- **Operating costs:** The daily costs associated with running housing.
- **Homeless Management Information Systems:** There are two ways HMIS costs are considered. One is for the HMIS Lead to cover costs to administer the HMIS system and the other is for Recipients to cover the cost of contributing data to the CoC-designated HMIS for their project.
- **Project administrative costs:** The costs to cover grant management related activities.

Although there are other eligible costs, such as CoC planning and Unified Funding Agency (UFA), this guide focuses only on the costs listed above.

Although a grant may only be one component, it may include multiple eligible costs. Each CoC Program grant has budget line items (BLIs) that correspond to the funded eligible activities. Not all eligible costs are eligible under every program component. Exhibit 1 on the following page shows the costs that are eligible under each CoC Program component.

**Exhibit 1: Eligible Costs for Program Components
24 CFR Parts 578.39 to 578.63**

Eligible Costs	Program Components					
	Permanent Housing		TH	SSO	HMIS	HP
	PH: PSH	PH: RRH				
Acquisition	✓		✓	✓		
Rehabilitation	✓		✓	✓		
New Construction	✓		✓			
Leasing	✓		✓	✓	✓	
Rental Assistance	✓	✓ (short & medium term only)	✓			✓
Supportive Services	✓	✓	✓	✓		✓
Operating Costs	✓		✓		✓	
HMIS	✓	✓	✓	✓	✓	✓
Project Administration	✓	✓	✓	✓	✓	✓

Resources

- <https://www.hudexchange.info/programs/coc/toolkit/program-components-and-eligible-costs/>

Note that Operating costs are not eligible under the SSO component because the costs of the day-to-day operation of an SSO facility are eligible supportive service costs for an SSO grant. Additionally, operating and leasing costs are not eligible under the HMIS component because the costs of operating and leasing a structure in which an HMIS is operated are eligible as an HMIS cost in a HMIS grant awarded to an HMIS Lead.

Restrictions On Combining Costs

There are limits on how different eligible costs may be combined. For example, a single unit is prohibited from receiving both rental assistance and operating funds because this would be considered “double-dipping” by essentially subsidizing the unit twice.

In a single structure or housing unit, recipients are prohibited from:

- **Combining Acquisition, Rehab or New Construction costs with:**
 - Leasing,
 - Tenant-based rental assistance, or
 - Other short- or medium-term rental assistance
- **Combining Rental Assistance costs with:**
 - Operating, or
 - Leasing. Note that it is acceptable to use leasing funds in one structure and rental assistance in another structure within the same project

All CoC costs are described below and in detail at 24 CFR Parts 578.39 through 578.63. It is important to note that not all expenses are eligible under every program component (see above) and that not all costs may be combined in a structure/unit. Recipients and subrecipients must understand any restrictions that are relevant to their grant.

It is important for recipients to be aware of the program component and approved budget line items for each grant.

Resources

- CoC Interim Rule:
https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf
- <https://www.hudexchange.info/programs/coc/>
- and by submitting questions to the HUD Exchange Ask A Question CoC Desk:
<https://www.hudexchange.info/get-assistance/my-question/>

Approved versus Eligible Costs

Recipients must understand the difference between approved and eligible costs under the CoC Program.

- **Eligible costs** are all those costs that are included in the CoC Program interim rule, as discussed above.
- **Approved costs** are the budget line items specifically approved by HUD in the recipient's grant agreement.

As part of the annual CoC Program Competition, each applicant submits an application to HUD with a project budget. This budget requests CoC Program funds to pay for specific costs (such as leasing, HMIS, etc.). HUD reviews the project application and budget, and if approved as submitted, incorporates into the recipient's grant agreement with HUD. Recipients must request and receive prior HUD approval to amend their project budget. See page 20 for information on grant amendments.

Eligible Activities within Eligible Costs

Rhode Island Recipients will have one or more of the following approved Budget Line Items.

1. Leasing
2. Rental Assistance
3. Supportive Services
4. Operations
5. HMIS
6. Project Administration

Within each budget line item are specific items or activities that are eligible to be either billed to the CoC grant or to be counted as match (see Page 21 for match information).

Eligible Cost: Leasing

Recipients lease a unit or structure from a property owner. CoC Program leasing funds may be used to cover costs including:

- Up to 100% of the cost of the unit, up to the Fair Market Rent and as long as the rent is reasonable.
- Up to two months' rent for a security deposit
- First and last month's rent
- Staff time and costs related to carrying out leasing-related activities such as:
 - processing payments to landlords/landowners;
 - examining program participant income and family composition; and
 - inspecting units for compliance with housing quality standards

Ineligible Leasing Costs

- Leasing funds cannot pay more than the FMR for housing. A Recipient can identify other funds to cover the difference if rents are above the FMR.
- Leasing funds cannot assist units that are not rent reasonable.
- Leasing funds cannot be used to rent housing owned by the recipient.
- Leasing funds cannot be used to make vacancy payments. However, since the lease is in the recipient's name, the recipient can keep paying rent until a new program participant moves in.
- Utilities are not eligible under the leasing budget line item. If utilities are not included in the rent, the cost of utilities can be paid out of operating budget line item.

Eligible Cost: Rental Assistance

Recipients may use funds to provide rental assistance under the PH (PSH and RRH) and TH program components. Through rental assistance, recipients use CoC Program rental assistance funds to pay the difference of the actual rent for a unit and a percentage of the program participant's income. The types, lengths, and requirements of rental assistance differ depending on the program component under which the rental assistance is being provided.

Rental Assistance may be:

- Short-term (up to 3 months) - TH and RRH
- Medium-term (4-24 months) - TH and RRH
- Long-term (more than 24 months) – PSH

Rental assistance can be:

- **Tenant-based:** Through the tenant-based rental assistance model (TBRA), program participants locate housing of their choice in the private rental market. If the participant later moves to another unit, he/she can take the rental assistance and use it in that new unit. Rapid re-housing projects must use a tenant-based rental assistance model. Although TBRA program participants have the ability to move and retain the rental assistance, recipients administering TBRA may limit where participants may live if it is necessary to facilitate the coordination of supportive services. Recipients may require program participants to live in a specific area for their entire period of participation, or in a specific structure for the first year and in a specific area within their geographic area for the remainder of the period of participation.
- **Project-based:** Rental assistance provided through the project-based rental assistance (PBRA) model is provided through a contract with the owner of a building who agrees to lease the subsidized units to program participants. With this model, the program participant does not retain rental assistance if they move. Rather, the unit would be rented to another eligible participant that would benefit from the PBRA.
- **Sponsor-based:** Sponsor-based rental assistance uses sponsor agencies to locate and rent housing units in the private market and then sublease these units to people who are homeless. Sponsors may be private, non-profit organizations or community mental health agencies established as a public non-profit organization. In this model, a sponsor agency owns units or leases units and then subleases the unit to a program participant. Units that receive sponsor-based rental assistance can be owned or leased by the recipient, subrecipient, or private owner in the community. If the program participant moves out of the unit, the sponsor can then sublease it to the next eligible participant. Or the sponsor can elect to continue SBRA to support the participant in his new unit, or the sponsor can locate another unit in the community and then sublet that unit to the same or a different eligible program participant. The decision is up to the sponsor because the rental assistance stays with the sponsor.

Ineligible Rental Assistance Costs

- Rental Assistance cannot assist a unit that is not rent reasonable.
- Rental assistance cannot be used in a unit with operating or leasing funds.

CoC Program rental assistance funds may be used to cover costs including:

- Up to 100% of the cost of the unit, up to rent reasonableness standard. Note that rent reasonableness cannot be exceeded even if it is below FMR. The FMR can be exceeded if the

higher rent is determined to be rent reasonable. However, subrecipients must manage the funds to ensure that there is sufficient funding to serve the number of participants included in the program application

- Up to two months' rent for a security deposit
- First and last month's rent
- Up to one month's rent for a damage payment due to the action of a program participant
- Up to one month's rent for a vacant unit following the end of the month when vacated

As with other CoC Program funds, rental assistance funds can also be used to cover the staff time and costs related to carrying out rental assistance-related activities such as:

- processing rental payments to landlords/landowners;
- examining program participant income and family composition;
- providing housing information and assistance;
- inspecting units for compliance with housing quality standards; and
- receiving new program participants into a program

Supportive Services

Recipients may use CoC funds to pay for a wide range of supportive services that address the special needs of program participants. All CoC-funded supportive services must be essential to helping program participants obtain and maintain housing (24 CFR part 578.53(a)(1)).

The CoC Interim Rule specifies fifteen (15) eligible supportive service costs (24 CFR part 578.53(d)). Recipients and subrecipients may not use CoC program service funds for any expenses not specifically described in the regulation as an eligible cost of providing supportive services.

Resources

- 24 CFR part 578.53(a)(1)
https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
Annual Assessment of Service Needs	Costs of conducting annual assessment need of service needs	<ul style="list-style-type: none"> • Staff time arranging and conducting annual assessment 	N/A
Assistance with moving costs	Reasonable one-time moving costs	<ul style="list-style-type: none"> • Truck rental • Hiring Moving company 	<ul style="list-style-type: none"> • Costs are one-time only and must be reasonable
Case management	Costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services	<ul style="list-style-type: none"> • Counseling • Developing, securing & coordinating services • Using the centralized or coordinated assessment system • Obtaining federal, State, and local benefits • Monitoring and evaluating program participant progress • Providing information and referrals to other providers • Providing ongoing risk assessment and safety planning with victims of domestic violence • Developing an individualized housing and service plan 	N/A
Child care	Costs of establishing and operating child care and providing child-care vouchers	<ul style="list-style-type: none"> • Provision of meals and snacks in child-care center • Provision of comprehensive and coordinated developmental activities in child-care center • Provision of vouchers to attend child-care center 	<ul style="list-style-type: none"> • Children must be under the age of 13, unless they are disabled children. • Disabled children must be under the age of 18. • Child-care center must be licensed by the jurisdiction in which it operates
Education services	Costs of improving knowledge and basic educational skills	<p>Instruction/training in:</p> <ul style="list-style-type: none"> • Consumer Education • Health Education • Substance Abuse Prevention • Literacy 	<p>Ineligible Costs:</p> <ul style="list-style-type: none"> • Cost of tuition for a degree or vocational accreditation.

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
		<ul style="list-style-type: none"> • English as a Second Language • General Educational Development (GED) <p>Component services include:</p> <ul style="list-style-type: none"> • Screening, assessment and testing • Individual or group instruction • Tutoring • Provision of books, supplies and instructional material • Counseling • Referral to community resources. 	
Employment assistance and job training	Costs of establishing and operating employment assistance and job training programs	<ul style="list-style-type: none"> • Classroom, online and/or computer instruction • On-the-job instruction • Services to assist individuals in securing employment including: <ul style="list-style-type: none"> ○ Employment screening, assessment, or testing ○ Structured job skills and job seeking skills ○ Special training and tutoring including literacy training and prevocational training ○ Books and instructional material ○ Counseling or job coaching ○ Referral to community resources • Services to assist individuals in acquiring learning skills and/or increasing earning potential including the acquisition of vocational licenses and/or certificates. • Providing reasonable stipends to program participants in employment assistance and job training programs 	

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
Food	Costs of providing meals or groceries to program participants	<ul style="list-style-type: none"> • Costs associated with purchasing, preparing and delivering meals to participants • Costs associated with the purchase of groceries for participants 	The purchase of gift cards in and of itself is not an eligible program cost under the CoC Program. However, if the recipient provides a gift card to be used by the program participant for food costs, and the recipient is able to document that it was used to pay for these eligible costs, gift cards may be used to pay for the cost of those services.
Housing search and counseling services	Costs of assisting eligible program participants to locate, obtain and retain suitable housing	<ul style="list-style-type: none"> • Conducting housing search and unit identification • Tenant counseling • Assisting individuals and families to understand leases • Securing utilities • Making moving arrangements. • Mediation with property owners and landlords on behalf of eligible program participants • Credit counseling including accessing a free personal credit report, and resolving personal credit issues • The payment of rental application fees 	
Legal services	Costs for the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with program participant's ability to obtain and retain	<p>Legal fees for representation in the following subject matters:</p> <ul style="list-style-type: none"> • Child support • Guardianship • Paternity • Emancipation • Legal separation 	<ul style="list-style-type: none"> • Fees based on the actual service performed (i.e., fee for service) are only allowed if the cost would be less than the cost of hourly fees • If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
	housing	<ul style="list-style-type: none"> • Orders of protection and other civil remedies for victims of domestic violence • Appeals of veterans and public benefit claim denials • Landlord/tenant disputes • Resolution of outstanding criminal warrants including assistance with expungement <p>Component services or activities include:</p> <ul style="list-style-type: none"> • Receiving and preparing cases for trial • Provision of legal advice • Representation at hearings • Counseling • Filing fees and other necessary court costs 	<p>employees' salaries and other costs necessary to perform the services</p> <p>Ineligible Costs:</p> <ul style="list-style-type: none"> • Legal services for immigration and citizenship matters • Issues related to mortgages and homeownership • Retainer fee arrangements and contingency fee arrangements • Costs incurred by the recipient related to eviction of a program participant
Life skills training	Costs of teaching critical life management skills	<p>Life skills training for:</p> <ul style="list-style-type: none"> • Budgeting of resources and money management • Household management • Conflict management • Shopping for food and other needed items • Nutrition, • Use of public transportation • Parent training 	<ul style="list-style-type: none"> • Services must be necessary to assist the program participant to function independently in the community.
Mental health services	Costs of direct outpatient treatment of mental health conditions that are provided by licensed professionals	<p>Component services include:</p> <ul style="list-style-type: none"> • Crisis interventions • Counseling • Individual, family, or group therapy sessions • Prescription of psychotropic medications or explanations about the use and management of medications 	

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
		<ul style="list-style-type: none"> • Combinations of therapeutic approaches to address multiple problems. 	
Outpatient health services	Costs of the direct outpatient treatment of medical conditions when provided by licensed medical professionals	<ul style="list-style-type: none"> • Providing an analysis or assessment of an individual's health problems and the development of a treatment plan • Assisting individuals to understand their health needs • Providing directly or assisting individuals to obtain and utilize appropriate medical treatment • Preventive medical care and health maintenance services, including in-home health services and emergency medical services • Provision of appropriate medication • Providing follow-up services • Preventive and non-cosmetic dental care 	
Outreach services	Costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants	<p>Outreach worker's transportation costs and a cell phone to be used when performing the outreach</p> <p>Component activities and services include:</p> <ul style="list-style-type: none"> • Initial assessment • Crisis counseling • Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries • Connecting and providing people with information and referrals to homeless and mainstream programs • Publicizing the availability of the housing and/or services within CoC 	
Substance abuse treatment services	<i>Costs of substance abuse treatment services</i>	<ul style="list-style-type: none"> • Program participant intake and assessment • Outpatient treatment • Group and individual counseling • Drug testing 	Program participants may be required to take part in such services as a condition of program participation but only if the purpose of the project is to

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
			provide substance abuse treatment Ineligible Costs: <ul style="list-style-type: none"> • Inpatient detoxification and other inpatient drug or alcohol treatment
Transportation	Costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible CoC services	<ul style="list-style-type: none"> • Mileage allowance for service workers to visit program participants and to carry out housing quality inspections • Costs of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants • Cost of gas, insurance, taxes, and maintenance for the recipient's vehicle • Costs of staff to accompany or assist program participants to utilize public transportation (e.g. bus or train fares/passes) • Where public transportation options are not sufficient, a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle 	<ul style="list-style-type: none"> • Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle • Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car • Recipients may require program participants to share in the cost of car repairs or maintenance Ineligible Costs: <ul style="list-style-type: none"> • Gas/Mileage costs for participant's personal vehicle
Utility deposits.	Assistance to pay utility deposits	<ul style="list-style-type: none"> • Utility deposit payment 	Utility deposits must be a one-time fee paid directly to utility companies. The one-time limit

Supportive Service Category	General Description	Eligible Costs	Restrictions/Ineligible Costs
			applies to each utility type requiring a deposit (e.g. it is allowable to provide a one-time deposit to the gas company and a one-time deposit to electric company).
Direct provision of services.	Staff and overhead costs related to the direct provision of eligible services noted above by the recipient or subrecipient	<ul style="list-style-type: none"> • Costs of labor or supplies, and materials incurred by directly providing supportive services • Salary and benefit packages of the recipient and subrecipient staff who directly deliver the services 	Ineligible Costs <ul style="list-style-type: none"> • Costs related to the provision of other services not described above. • Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services

If supportive services are being provided directly by the recipient eligible costs include the costs of labor (salary and benefits) or supplies and materials directly for providing supportive services to program participants.

Eligible Costs: Operating Costs

Recipients may use CoC operating funds to pay the costs of the day-to-day operations of transitional and permanent supportive housing in either a single building or structure or in individual housing units.

Eligible operating costs include:

Eligible Cost	Description
Maintenance and Repair	Costs related to maintenance including cleaning, plumbing repairs, painting, heating system upkeep, building systems repairs.
Utilities	Electricity, gas, heating oil or other heating/cooling costs, and water
Furniture	Furniture for the operation of the housing; must be retained for use in the project and cannot be kept by program participants with the exception of mattresses.
Equipment	Refrigerators and ranges for use by participants and equipment needed for the maintenance of the housing (ladders, shovels, etc.)
Security	Security for a housing program where more than 50 percent of the units or building area is paid for with grant funds
Taxes and Insurance	Real estate taxes and building/property insurance
Landscaping	Basic lawn maintenance such as lawn mowing and maintenance of walkways.
Reserve fund	Scheduled payments to a reserve fund for the future replacement of major building systems, with payments based on the useful life of the system(s) and the expected replacement cost(s). HUD has not provided guidance on how payments can be made into a reserve fund so recipients should contact their HUD Field Office for additional guidance.

Ineligible Operating Costs

- Landscaping for beautification is not eligible
- Food (eligible supportive service cost only)
- Operating costs in units receiving rental assistance
- Operating funds may not be used in emergency shelters or SSO facilities.
- Building security where less than 50% of the units in the building are paid for with CoC Program funds.
- Maintenance and repair of housing where those costs are included in the lease

As with other CoC Program funds, eligible operating costs include the staff time and overhead costs related to carrying out eligible operating activities.

HMIS Non-HMIS Lead Entity (HMIS costs for TH,PH, SSO projects to implement HMIS within their CoC project)

Any project may have an HMIS Budget Line Item to support costs associated with HMIS data collection.

This cost category is not limited to HMIS Lead agencies. HMIS funds can also be use on the following:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Leasing office space; (vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - (A) Completing data entry;
 - (B) Monitoring and reviewing data quality;
 - (C) Completing data analysis;
 - (D) Reporting to the HMIS Lead;
 - (E) Training staff on using the HMIS; and
 - (F) Implementing and complying with HMIS requirements;
- Paying costs of staff to travel to and attend HUD-sponsored and HUD approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- Paying staff travel costs to conduct intake; and
- Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient is not the HMIS Lead.

Recipients must know how much admin their project was awarded – i.e. how much is approved in each grant.

Project Administration

Up to 10 percent funds may be used to cover eligible administrative costs. However, each Notice of Funding Availability (NOFA) may set more restrictive limits on the percent of funds available for administrative costs. In addition, CoCs may put further restrictions on available administrative funds. (Recipients are required to share at least 50 percent of administrative funds with subrecipients.)

Recipients are required to spend the administrative funds on eligible administrative expenses. Administrative costs must be incurred within the term of the grant.

Eligible administrative costs include the costs following:

- **General management, oversight, and coordination.** Management, coordination, monitoring, and evaluation activities may include but are not limited to:
 - The salaries, wages, and associated costs of the Recipient staff engaged in program administration such as:
 - Preparing program budgets and schedules
 - Developing budget amendments and related documentation
 - Developing program compliance systems
 - Developing agreements and/or contracts with contractors to carry out program activities
 - Monitoring for progress and program compliance
 - Preparing program reports and other program documents for submission to HUD
 - Coordinating resolution of audit and monitoring findings
 - Evaluating program results against stated objectives
 - Managing or supervising program administrative staff

Ineligible Admin Costs

- Agency fundraising
- Agency’s general operating costs

- Any administrative services performed under third-party contracts such as accounting, legal, and audit services
- Other costs required for program administration such as:
 - Rental or purchase of equipment
 - Insurance
 - Utilities
 - Office supplies
 - Rental and maintenance of office space (but not the purchase of office space)
- Training on CoC requirements. Costs associated with providing training on CoC requirements and attending HUD-sponsored CoC training, including reasonable and necessary costs for travel and staff time to attend training
- Environmental review. Costs of carrying out activities associated with completing the environmental review according to 24 CFR part 578.31. For more information on Environmental Review please see page 49.

Accounting and Documenting Staff Time

Under each eligible cost, HUD has stated that the costs of staff and direct overhead for carrying out eligible activities for each of the eligible activities under the CoC Program are to be charged to the eligible budget line item for that activity (e.g., maintenance worker should be charged to the operating budget line item, and costs of administering rental assistance should be charged to the rental assistance budget line item). Therefore, these costs (staff and overhead) should not be charged to the project administration budget line item. Only those staff and overhead costs related to carrying out project administration should be charged to the project administration budget line item. More on how to document staff time on page 28.

Special Note for billing certain administrative personnel time

The CoC Interim Rule provides further guidance to recipients for billing personnel to administrative line item. When staff are carrying out activities such as overall program management, coordination, monitoring, and evaluation these costs include, but are not limited to, necessary expenditures for the following: salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. This methodology doesn't apply to staff time/expenses related to the other eligible admin cost categories such as training on Continuum of Care requirements and carrying out environmental review responsibilities.

Resources

- 24 CFR part 578.31
https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

Form To Track Key Information For Each Grant

Program Name: Horizon House

Grant #: RI-3322621

Operating Year: 10/1/16-9/30/17

Program Component (ONLY ONE):

- Permanent Supportive Housing
- Rapid Re-Housing
- Transitional Housing
- Services Only
- HMIS

Approved Budget: (from grant agreement) (CAN BE MORE THAN ONE)

1. Leasing: 24,000
2. Rental Assistance:
3. Supportive Services: 35,000
4. Operations: 4,000
5. HMIS: 1,000
6. Administration: 3,200

TOTAL BUDGET: 67,200

MATCH REQUIREMENT (25% OF LINES 2-6 ABOVE): 16,800

Section 2: Project Changes – Grant Amendments

Significant and minor changes to a project are sometimes necessary during the term of a CoC Program grant. Recipients cannot make any significant changes to projects without prior HUD approval as evidenced by grant amendments signed by HUD and the recipients. Significant changes substantially affect project implementation and represent a departure from the initial application.

Significant changes include:

- Change of recipient
- Change of project site
- Addition or elimination of eligible costs approved for a project
- Shift of more than 10 percent of from one approved eligible cost category to another
- Permanent change in subpopulation served by any one project under the grant
- Permanent reduction in the total number of units funded under the grant.

HUD will not approve requests for a change in recipient unless the new recipient meets the capacity criteria described in either the NOFA under which the grant was awarded or the most recent CoC Program NOFA. HUD may also require approval by the CoC.

HUD will approve a shift in funds or change in subpopulations only if such changes are necessary to better serve eligible persons within the CoC's geographic area and if the change supports priorities established under the CoC Program NOFA in which the grant was originally awarded or the most recent CoC Program NOFA.

Minor Changes

Minor changes from the approved grant do not substantially affect grant implementation. An example of a minor change is a shift of less than ten percent of CoC Program funds from one approved activity to another over the term of the grant. Minor changes do not require HUD approval. However, a Recipient must notify HUD of these changes in writing.

To request a grant amendment or to notify of minor changes, recipients should initiate communication with their HUD Field Office Representative.

Section 3: Matching Funds

Recipients must match at least 25 percent of the total CoC Program grant funds expended, less amounts received for leasing. Leasing funds do not have a match requirement.

The match requirement can be met with cash or in-kind contributions and services on a grant by grant basis. Recipients are responsible for:

- Meeting the 25 percent match requirement over the grant term (this may be one year if a one year grant or two years if a two year grant)
- Securing match contributions for the project
- Tracking match expenditures
- Developing procedures and reporting formats to collect and compile match information

Match must be used to support CoC Program eligible costs as discussed in Section 1 specifically related to the grant-funded project and its participants. Any resources expended on ineligible activities will not be counted towards meeting the 25 percent match requirement.

Match is not specific to an individual budget line item. The match amount is calculated across the sum of all budget line items, except leasing. Examples below show one project with leasing funds and one project without leasing funds.

Match Calculation Examples:

CoC Program A receives: \$25,000 in leasing
 \$30,000 in supportive services
 Match: 25 % x **\$30,000** (leasing is excluded) = \$7,500 (match requirement)

CoC Project B receives **\$25,000** in rental assistance
 \$30,000 in supportive services
 Match: 25 % x (**\$25,000 + \$55,000**) = \$13,750 (match requirement)

Since the match obligation is tied to 25 percent of the total CoC Program grant (except leasing funds) meeting the requirement is not tied to a specific budget line item or eligible cost activity. Rather, the match can be met with cash or in-kind contributions spent on any CoC eligible cost even if that eligible cost is not included in the grant’s CoC budget.

Table XXX: CoC Program Budget Example

Cost	CoC Program Funds Expended	Match	Total
Operating	\$100,000	\$0	\$100,000
Services	\$0	\$25,000	\$25,000
Project Administration	\$10,000	\$2,500	\$12,500
Total	\$110,000	\$27,500	\$137,500

Recipients are required to report on anticipated match or initial commitment agreements during the project application and the total match funds used by the project in the Annual Performance Report (APR) and then during monitoring by HUD where the HUD field office staff will review the supporting match documentation on-site or remotely.

Self-Monitoring for Match

If at the end of a grant term, the match requirement is not met, the recipient may be asked to repay funds in an amount sufficient to meet the 25% match requirement. To avoid failure in meeting match requirements, recipients are encouraged to monitor match activity throughout the grant term. For example, it is advisable for a recipient to track match on a monthly basis along with their LOCCS drawdowns (see page 27).

Sources

Match resources may be contributed to the project from a variety of federal, state, local, or private sources. If using other federal programs as match, the laws governing the other program must permit the funds to be used as match. Recipients are responsible for determining if cash and in-kind match sources are statutorily allowed to be used as CoC Program match. CoC Program funds are not an eligible match source for other CoC funds.

Cash

Cash match is the actual outlay of funds spent on eligible CoC Program costs. Cash only counts as match if the recipient can demonstrate that a payment of funds was made to cover the cost of CoC eligible activities expended during the grant term.

Recipient cash may come in a variety of forms:

- a grant it receives from another entity to support CoC eligible activities
- the recipient's own cash resources spent on the CoC eligible activities
- fundraising efforts organized by the recipient to raise resources that are then spent on eligible CoC activities

Recipients should follow the same documentation processes outlined for CoC expenditures for its match documentation.

Program Income and match

Recipients must be careful in how any program income is treated toward match. Program income is defined as the income received by the recipient directly generated by a grant-supported activity. It includes rents and occupancy charges collected from program participants directly by recipients. Rent paid by a program participant to a private landlord is not program income since the funds are not coming to the Recipient. When the CoC Interim Rule was published, it did not specify that program income can be used as match. This meant that the tenant share of rent or other program income, although spent on CoC eligible activities, could not be counted toward the 25 percent match.

For fiscal year 2015 and fiscal year 2016 CoC Program grants, HUD published guidance outlining that program income could be counted as cash match . Until a final clarification is made on program income and match, recipients will need to closely follow annual guidance provided by HUD through NOFAs or other means.

In-Kind

In-kind match is the value of any real property, equipment, goods, or services contributed to a CoC Program grant that would have been an eligible CoC activity. In-kind match can be donations provided directly by the recipient or it can be from a third party as well. For example, if the local hardware store donates paint to a CoC project to paint the apartments in which program participants reside, then the value of the paint can be a match. If volunteers do the painting, then the time donated by the volunteers would count toward match.

Often an agency that is not the recipient will receive funding from a non-CoC source to provide a service. For example, a local community mental health center may bill a State agency to provide case management services. The value of the case management services provided to the program participants during the grant term can be counted as match as long as an MOU is in place.

Documentation Requirements

As noted previously, match commitments and expenditures must be documented to be considered eligible and the match expenditure must occur during the grant term.

Match documentation occurs during at least four points in a grant's life cycle: at time of application, at time of grant execution, in the grant reporting and at conclusion of grant term.

1. At the time of application, applicants will follow directions included in the annual CoC Program Notice of Funding Availability (NOFA) regarding match documentation. Typically, this includes at least one written commitment to a specific project which describes at a minimum the type, cash or in-kind, the source(s), and the value of the match.
2. At the time of grant execution, recipients are required to demonstrate that they have enough committed resources, cash or in-kind, to meet the match requirements for funds awarded. (*See documentation section below for more details*)
3. In the Annual Performance Report (APR), recipients will document progress towards match. If the grant term was for one year, than the information in the APR should demonstrate that the match requirement was met. If the grant term was for more than one year, than the information in the year one APR would indicate progress toward meeting the match requirement.
4. At the conclusion of the grant term, the recipient must be able to document that the secured match resources, cash and in-kind, were spent on eligible activities. The documentation must also show that the recipient met the 25 percent match requirement, for the grant funds expended, through cash or in-kind resources as described in the application and grant agreement.

Recipients must maintain additional documentation, beyond the initial commitment agreements and APR, which show the match requirements are met. Specifically, recipients must keep records of the source and use of funds and resources used to satisfy match requirements that indicate

- The match was provided for the grant during the grant term
- Value and description of in-kind contributions and services and the actual date provided

Given the importance of the match requirement, it is critical that recipients understand their responsibilities in tracking and documenting match commitments and expenditures.

Documentation for the expenditure of match resources, for cash or in-kind, is required to meet the same standards as CoC Program funds. For example, staff time used as match must be supported by timesheets or an equivalent system for recording the amount of time each day that a staff person dedicates to the CoC Program project and performing eligible activities.

Cash

Cash match must be substantiated in a commitment letter and then must be tracked through the recipient financial statements, general ledgers, and other records that reflect yearly financial status to show the cash was spent on eligible expenses within the operating year.

The cash match written commitment must be documented on the committing agency's letterhead and must be signed and dated by an authorized representative of the agency providing the match. The documentation, at a minimum, must include the:

- Amount of cash to be provided for project
- Specific date the cash will be available to the project
- Grant and fiscal year to which the cash match will be contributed
- Allowable activities to be funded by the cash match.

In-Kind Property, Equipment or Goods

In-kind property, equipment, or goods must be substantiated in a commitment letter and then must be tracked by the recipient to show they were delivered to the project and, if applicable, its participants within the grant term.

Written commitments for in-kind property, equipment, or goods are documented on the committing agency's letterhead and must be signed and dated by an authorized representative of the agency providing the match. The documentation, at a minimum, must include the:

- Description and value of the donated property, equipment, or goods
- Specific date the property, equipment, or goods will be made available to the project
- Grant and fiscal year to which the property, equipment, or goods will be contributed
- Method used to determine the value of the property, equipment, or goods.

Land, buildings and equipment are allowable in-kind match sources, but a recipient must determine how they will use the resources as match. For example, the full value of the property, as valued the first year it is utilized as match, can be counted once, in a lump sum within a single grant year or over multiple grant terms as a prorated amount of the original value. Prorated amount means the full original value is divided by a set number of years, which is then counted in multiple grant years. It is important to understand that proration is not the same as depreciation. Depreciation is a reduction in the value of an asset with the passage of time, due in particular to wear and tear. Depreciation is not an allowable source of match.

In-Kind Services

In-kind services provided by a third party must be substantiated in a commitment letter and a Memorandum of Understanding (MOU) and then must be tracked by the recipient to show the services were delivered to project participants within the grant term. The MOU must include detail of the in-kind services, their value, and the calculation method to be used in determining the value.

Each in-kind service MOU must:

- Establish the unconditional commitment to provide the services, except a requirement for the project to be selected for funding by the CoC and HUD
- Specify the services to be provided to the project
- List the profession of the person who will provide the services
- Include the hourly cost of the services
- List the grant and fiscal year to which the in-kind match will be contributed

- Detail the system to be used to document the actual level and value of the services provided to program participants during the grant term.

During the grant’s term, the actual in-kind services provided to participants must be documented including: Quantity; Value; and Date(s).

Recipients must request information from third-party service providers on in-kind service match activity at least annually and are responsible for verifying that the match is for eligible and related to program participants served in the operating year. It is recommended that Recipients request this information on a more frequent basis such as monthly or quarterly so as not to be deficient in match requirements.

Volunteers

Many Recipients are successful in attracting volunteers to provide in kind services. The value of the volunteers time performing an eligible activity is a form of match. Recipients must document the time and activity of volunteers through sign in sheets or other similar documentation. Eligible activities provided by volunteers must be valued at a standard rate for the industry and geographic area in which the project operates. When feasible, the time (in hours) of volunteers must be supported by the methods used to support the allocation of regular personnel costs. See a sample Volunteer Tracking form at the end of this chapter.

Examples of Match

CoC Program recipients are expected to identify eligible match sources. As discussed earlier, recipients have many options for match contributions and will work locally to identify sources and partners who can support the success of the grant. Below are some examples of match to demonstrate what is allowable and what is not. These lists are by no means exhaustive and serve only as a framework to help recipients understand how to operationalize match requirements.

Match **may include**:

- Donated title services or appraisal fees provided by another agency
- A recipient that is paying the salary of a case manager with non-CoC Program funds to serve program participants would be considered cash match
- A recipient that signs a MOU with another agency for case management services to the program participants would be considered in-kind match
- Groceries provided to participants
- Housing-focused pro-bono legal services
- Hardware costs for equipment used by staff doing HMIS entry
- Software licenses (if not CoC Program funded)
- Personnel costs related to performing HMIS duties if not reimbursed by the CoC grant.

Match **does not** include:

- Cash or in-kind contributions used as match for another grant
- Cash or in-kind contributions that are statutorily prohibited as match under the CoC Program
- In-kind services provided without an executed MOU
- Participant savings accounts
- Mainstream benefits provided directly to program participants (for example food stamps)
- Depreciated value of buildings utilized by CoC Projects.

Volunteer Tracking Form – Sample

Program Name: Hope House

Grant #: RI 000456-17

Operating Year: 2/1/17 – 1/31/17

Date	Name of Volunteer	Tasks/Activities Performed	# Hours	Supervisor approval
3/20/17	Jane Smith	Painted apartment 4c	5	<i>Sally Hanson</i>
3/21/17	Jane Smith	Painted apartment 4b	4	<i>Sally Hanson</i>
3/5/17	Tom Jones	Legal Services	3	<i>Sally Hanson</i>
3/12/17	Tom Jones	Legal Services	3	<i>Sally Hanson</i>
3/19	Tom Jones	Legal Services	3	<i>Sally Hanson</i>
3/26/17	Tom Jones	Legal Services	3	<i>Sally Hanson</i>

For business office:

Volunteer	Total Hours	Rate per hour	Match Total
Jane Smith	9	\$10	\$90
Tom Jones	12	\$150	\$1,800

Total Volunteer Match for the month of March 2017: \$1,890

Note: Recipients must have documentation for how it determined the value of the volunteer’s time.

Section 4: Invoicing and Payment Processing

Recipients are required to submit invoices to HUD on at least a quarterly basis, but ideally monthly.

Invoices are submitted through HUD's Line of Credit Control System. The Line of Credit Control System (LOCCS) is the U.S. Department of Housing and Urban Development's (HUD) primary grant disbursement system, handling disbursements for the majority of HUD programs. Grant disbursements are facilitated via the Internet through the e LOCCS system. Customers (users and approving officials) are required to gain access to Secure System or FHA Connection. Both Secure System and FHA Connection serve as an internet gateway between the general public and the internal eLOCCS application. **Please Note: There is a requirement for a separate eLOCCS User ID and password from Secure Systems access for both users and approving officials.**

The requested payment amount is checked against the grant's available balance in LOCCS to ensure that the request does not exceed the grant's authorized funding limit. LOCCS will only allow **one draw per day** on a given grant, unless funds are requested by project or sub grantee. Once a request/draw is approved, funds are sent from the U.S. Treasury directly to the grantee's bank account, usually within 48 hours from the day the request is made.

In short, recipients will request funds through e-loccs. No backup documentation is submitted to HUD at the time of the e-loccs invoice submission. **However, recipients must maintain all back up documentation for future HUD review and monitoring.**

Strong back up documentation will demonstrate that the cost is eligible, was spent on program participants, occurred during the operating year and overall meets CoC requirements.

The following are strategies to ensure strong documentation. Recipients should make sure they have this back up documentation in place **before** they request CoC funds from HUD.

When monitored by HUD, Recipients who do not have adequate back up documentation may be required to repay the federal government. Do not request funds unless you can fully document the request!

Resources

Complete guidance on LOCCS can be found at:

https://portal.hud.gov/hudportal/HUD?src=/program_offices/cfo/loccs_guidelines-3

HUD LOCCS documents include:

- **HUD Form 27054: LOCCS Access Verification Form**
<https://portal.hud.gov/hudportal/documents/huddoc?id=27054.pdf>
- **ELOCCS Registration Guide**
https://portal.hud.gov/hudportal/documents/huddoc?id=eloccs_registration_guide.pdf

Documenting Eligible Costs

Eligible costs fall into spending categories including: personnel, third party contractors, supplies, mileage, equipment, utilities, furniture, food, and rent. The documentation requirements for these spending categories are generally the same regardless of the Eligible Cost with the exception of personnel which has additional requirements. How you document supplies for administration and supplies for operations will be the same.

Documenting Personnel Costs

Most recipients hire staff to operate their project. These often include supportive services staff such as case managers, operations staff such as maintenance workers and janitors, and administration staff such as a bookkeeper or administrative assistance. At times the staff person may wear only one hat (i.e. perform one job function on one grant) but often staff wear many hats (and perform multiple jobs on one grant or work on more than one grant).

Remember, under each eligible cost, HUD has stated that the costs of staff and direct overhead for carrying out eligible activities for each of the eligible activities under the CoC Program are to be charged to the eligible budget line item for that activity (e.g., maintenance worker should be charged to the operating budget line item, and costs of administering leasing should be charged to the leasing budget line item).

Recipients should make sure they have the following documentation in place for all employee time for which they are seeking reimbursement:

1. Timesheets
2. Payroll company summary sheet or paystubs (demonstrating that the employee was actually paid)

Timesheets

Recipients can use their own agency timesheet format as long as it contains the following:

- Employee Name
- pay period
- dates of service
- specific hours worked broken out by Program and/or CoC Budget Line Item (if applicable)
- specific hours worked on non-CoC activities
- Specific time attributed to agency-approved paid time off/leave time.
- Signature of employee
- Signature of supervisor
- All time reported on the time sheet must add up to 100%

Checklist

- ✓ Timesheets include specific hours worked and hours are broken down by CoC Program areas, CoC programs, Administration functions, etc.
- ✓ Timesheets are assigned by employee
- ✓ Timesheets are signed by a supervisor
- ✓ Payroll Company Summary sheet matches the total number of hours worked and the base rate as noted in the Wage Approval Form

Timesheets must be physically signed and dated by the employee and a supervisor. If an agency uses an electronic signature or related system, this process must prevent any overriding of employee time.

Payroll Company Summary Sheet

In addition to the timesheet, each payroll company provides a summary of the employee's payroll

including gross wages, hours worked, etc. The period covered by the timesheets and the payroll company summary sheets must align.

The Payroll Summary Sheet demonstrates that a payroll check was cut for the employee. It shows how much the employee was paid.

Fringe

Recipients can charge appropriate fringe benefit costs to the CoC program for staff performing CoC eligible activities. Some recipients have an annual fringe rate approved by a third-party auditor and can apply this rate to the hours billed. Or, recipients can calculate the fringe rate for each employee each pay period and apply that rate to the billing.

Time and Effort Reporting

All employees charged to federal grants or whose time is to be considered required match to a federal grant, **must maintain time and effort reporting**. These time and effort records must be maintained by the Recipient. Time and effort records become subject to review during audits, monitoring, or other situations that require the recipient to provide evidence that time funded by the HUD CoC grant was spent working towards the grant's objectives.

What is required? There are two types of required time and effort records: (1) general semi-annual certifications and (2) detailed activity reports. The type of record that must be kept is based on the job responsibilities of the individual charged to the grant.

The lack of time and effort reporting is the single largest audit finding by the US Office of Inspector General (OIG). Costs that do not have adequate documentation are deemed "unallowable" and subject to repayment.

Semi-Annual Certifications (Single Cost Objective)

Employees who work on only one grant and only do one type of activity are considered to have a single cost objective. For example, a janitor who only works on Project A and only does janitorial duties on Project A would be considered to have a single cost objective. **It is rare to have a position that falls into a single cost objective.** Positions that can be characterized as a single cost objective can create and maintain a Semi-annual Certification completed by the Employee and Supervisor. This Certification must identify the Employee's Name, Position, CoC Program, and Reporting Period (the previous 6 months). This document has the employee and a supervisor confirm that **all** of the employee's work during the previous 6 months was on the one project and the one budget line item. If a Recipient has employees in this category they should maintain a copy of these Semi-annual Certifications along with the job description. The following is a sample Semi-annual Certification that a Recipient can use.

Semi-Annual Certification

Employees who are supported solely by CoC Grant **and** One BLI.

Recipient:

Program Name:

Grant #:

Employee Name:

CoC Program Name:

Certification Period: to

Subpart A 200.430 (i) requires employees who are compensated by federal grant dollars and work solely on a federal award to submit at least semi-annual certifications that the employee worked solely on that program.

Subpart A 200.430 (i) Where employees are expected to work solely on a single Federal award or cost objective, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications will be prepared at least semi- annually and will be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

I, _____ certify that 100% of my work time from MM/DD/YY to MM/DD/YY was spent on _____ duties and responsibilities for the above noted program and grant number.

Employee Signature

Supervisor Signature

Date

Date

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. statements code title 18, Section 1001 and Title 31, Sections 3729- 3730 and 3801-3812.

Employees who fall into this single cost objective category must still complete timesheets recording actual hours. In addition, if an employee who provides supportive services meets the criteria for a single cost objective that employee must still complete case notes on all participant interactions. Case notes are discussed on Page 37.

Non Single Cost Objective

All other employees (this represents the majority of employees) who either work on multiple programs or multiple activities/ budget line items within one grant (e.g. operations and services or services and administration) must complete activity reports. The level of detail for activity reports is greatest for supportive service staff. Documentation of effort must be of actual effort, not estimates. Supporting documentation can be logs, work calendars, schedule books, etc. The Activity Log must be signed by the employee. While there is no one format for the Activity Record, the following key information must be included: Date of service, Description of the activity, time spent on that activity, and the employee's signature.

Activity Records

Activity records must be maintained by the recipient in either a paper or electronic format. These can be combined with a timesheet or stand alone. However before submitting an invoice for payment, the recipient should confirm that the hours reflected in the activity record match the hours in the timesheets and the hours in the billing sheet.

Sample activity reports are included on the following pages.

Elements of Activity Reports

- Date of Activity
- Brief summary of activity (can be bullets, check boxes, etc.)
- Was activity in person, remote or other means
- Time spent on activity
- Program or BLI if multiple

Maintenance Check list

Staff person: **Program Name:**
Date: **Hours worked:**

General Floor hallways and aisles

- Daily, dry mop, Wet mop hard surfaces
- Daily, vacuum, spot clean carpeted surfaces
- Weekly, Change Matting
- Monthly, buff / burnish hard surfaces Monthly, Damp refresh carpeted areas
- Semi-Annually, shampoo / extract carpeted surfaces
- Semi-Annually, Clean and wax vinyl tile surfaces

Restroom Cleaning

- Daily Clean and sanitize Restroom Floors – Sweep, damp mop with a germicidal solution
- Clean and Sanitize Sinks and Countertops
- Spot clean stall walls and doors, report inappropriate graffiti to security.
- Empty trash, spot clean containers, reline with appropriate size trash bag
- Clean Restroom mirrors
- Clean/Disinfect Dispensers restock all dispensers
- Spot Clean/Disinfect Walls / doors
- Clean all horizontal surfaces.

Common areas

- Empty trash as required, spot clean containers, reline with appropriate size trash bag
- Remove debris from tables and shelves and sanitize
- Sweep and sanitize floor surfaces
- Clean, with disinfectant, all phones/tables.
- Weekly, Scrub floor surfaces
- Semi-Annually, Scrub and recoat floor surfaces

Window cleaning

- Daily-Spot clean all interior windows in the common area.
- Weekly – Clean Sills in common areas

Non-routine requests

- Provide cleaning of “meeting” rooms in between scheduled use.
- Provide additional attention to lobby and entrance areas during poor weather conditions.
- Provide spill cleanup as needed

Exterior

- Sweep sidewalk and remove trash/debris
- Shovel/snow blower
- Ensure removal of ice/disperse rock salt as needed.

Program name:

Employee:

Date:

Common Areas of the Building			
<input type="checkbox"/>	Clean and mop building floors	<input type="checkbox"/>	Paint
<input type="checkbox"/>	Gather and empty trash	<input type="checkbox"/>	Snow removal
<input type="checkbox"/>	Inspect public areas	<input type="checkbox"/>	Mow and trim lawns and shrubbery
<input type="checkbox"/>	Replace lightbulbs	<input type="checkbox"/>	Minor repairs to HVAC
<input type="checkbox"/>	Replace, repair smoke detectors	<input type="checkbox"/>	Spray insecticides and fumigants
<input type="checkbox"/>	(other)	<input type="checkbox"/>	(other)
Total Time on Unit:			

Unit Assistance Note: Unit #			
<input type="checkbox"/>	Respond to request for services/inspect unit	<input type="checkbox"/>	Paint
<input type="checkbox"/>	Spray insecticides and fumigants	<input type="checkbox"/>	Inspect broken light/replace bulbs
<input type="checkbox"/>	Inspect report of broken appliance	<input type="checkbox"/>	Inspect and respond to leaking plumbing
<input type="checkbox"/>	Inspect heat complaint and troubleshoot	<input type="checkbox"/>	(other)
<input type="checkbox"/>	Replace, repair smoke detectors	<input type="checkbox"/>	(other)
<input type="checkbox"/>	(other)	<input type="checkbox"/>	(other)
Total Time on Unit:			

Unit Assistance Note: Unit #			
<input type="checkbox"/>	Respond to request for services/inspect unit	<input type="checkbox"/>	Paint
<input type="checkbox"/>	Spray insecticides and fumigants	<input type="checkbox"/>	Inspect broken light/replace bulbs
<input type="checkbox"/>	Inspect report of broken appliance	<input type="checkbox"/>	Inspect and respond to leaking plumbing
<input type="checkbox"/>	Inspect heat complaint and troubleshoot	<input type="checkbox"/>	(other)
<input type="checkbox"/>	Replace, repair smoke detectors	<input type="checkbox"/>	(other)
<input type="checkbox"/>	(other)	<input type="checkbox"/>	(other)
Total Time on Unit:			

Unit Assistance Note: Unit #			
<input type="checkbox"/>	Respond to request for services/inspect unit	<input type="checkbox"/>	Paint
<input type="checkbox"/>	Spray insecticides and fumigants	<input type="checkbox"/>	Inspect broken light/replace bulbs
<input type="checkbox"/>	Inspect report of broken appliance	<input type="checkbox"/>	Inspect and respond to leaking plumbing
<input type="checkbox"/>	Inspect heat complaint and troubleshoot	<input type="checkbox"/>	(other)
<input type="checkbox"/>	Replace, repair smoke detectors	<input type="checkbox"/>	(other)
<input type="checkbox"/>	(other)	<input type="checkbox"/>	(other)
Total Time on Unit:			

Continuum of Care Maintenance Log

Agency Name: _____ **Employee Name:** _____

Reporting Month: _____ **Employee Title:** _____

Date	CoC Project	Address/Unit	Description of Maintenance Activity	Start Time	End Time	Total Hours

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise.

Print Employee Name **Employee Signature** **Date**

Print Authorizing Official Name **Authorizing Official Signature** **Date**

Supportive Service Staff

As mentioned earlier, staff that provide supportive services to program participants must maintain case notes. If a supportive service staff person falls into the Single Activity/BLI category, they can complete the semi-annual certification for time and activity and they must also maintain case notes on participant interactions.

If a supportive service staff person's position falls into the Multiple Activity/BLI category, they must maintain a record of time, activity and case notes.

Supportive Service Activity Record

Similar to other staff, the activity record for the supportive service staff must provide the date of service, a description of the activity, and number of hours spent on that activity. In addition case notes on meetings and interactions with program participants must be completed. The activity record should align with the case notes meaning the activity record will note a date and meeting with a program participant then the case note should also reflect that date and meeting.

Activity records can be calendars if they reflect actual meetings, calls and work, an activity log, or other recording mechanism. Activity records need to match the information on timesheets and billing sheets.

HUD does not have a format for case notes. Case notes can be entered into HMIS, an agency's own proprietary system, or a paper file. Key elements of good case notes include:

The following are **SAMPLE** Activity Records for a Case Manager. The first is a calendar and the second a distinct activity record/chart. Only one is needed.

Elements of Case Notes

- Date of Interaction or Activity
- Identification of the Problem (if relevant)
- Identification of Progress (if relevant)
- What interventions were provided or discussed?
- What are intended outcomes?
- What are any specific next steps if relevant?

A. Sample Calendar Entries Updated to Reflect Actual Day

Jane Smith's Calendar for Date

9 am	Client file review (15 minutes). Meeting with #PP0625 and case notes (45 minutes)
10 am	Meeting with #pp0475 and case notes (1 hour)
11 am	Called MRC for information on employment programs (30 minutes) Crisis with #pp0224 (
12 pm	Crisis with #pp0224 (Total 90 minutes)
1 pm	Lunch (30 minutes) Prepped for group meeting (30 minutes)
2 pm	Responded to inquiries about the program (30 minutes) Prep for group meeting (30 minute)
3pm	Group meeting (60 minutes)
4pm	Scheduled meeting with #pp00892 (no show) 45 minutes. 15 minute final case notes for day

Make sure Calendar is updated at the end of a day to reflect, "What really happened" vs. what was scheduled to happen.

B. Sample Activity Record

ABC Agency Case Manager Activity Record

Date:		Case Manager: Jane Smith	
Time	Activity	Program Participant	Notes
15	Reviewed client notes/files to prep	All clients	
60	Client meeting and case notes	#pp0475	
30	Call with MRC	All	Research employment programs
90	Crisis with #pp0224	#pp0224	Intervention needed
30	Lunch		
30	Prep for group meeting	All	Prep time
30	Responded to shelter's questions on program	All	
30	Continued prep for group meeting	All	
60	Group meeting	All	Topics: employment barriers
45	No show on scheduled meeting	#pp00892	Called, sent text,
15	Final notes for day	All	

Preparing for the Invoice

Before submitting an invoice, recipients should organize all documents and confirm they have all documentation in a safe and secure place in their office.

Invoice Checklist for Personnel Costs

Required Documentation	<ul style="list-style-type: none">✓ Signed Timesheets✓ Payroll Company Record✓ Activity Charts✓ Case notes for service staff✓ Semi-annual certification if applicable
Steps to confirm accuracy	<ul style="list-style-type: none">✓ Confirm hours on timesheet with Hours billed through eloccs✓ Confirm total hours worked with payroll company✓ Ensure Case Notes available for all client contact✓ Confirm activities for staff match timesheets and LOCCS invoice

Non-Personnel Costs

Non-Personnel costs include contractors or third party entities retained to provide either a one-time service (e.g. repair a leaking sink) or regular on-going services (e.g. bookkeeping or snow removal). Non-personnel costs also include supplies and equipment that are purchased, utilities that are used, mileage expenses on personal vehicles and other transportation-related expenses, food, and rent and leasing charges.

Contractors and third party entities

The selection of all contractors and third party entities must align with the Recipient's procurement policy to ensure that the selection was made in an open and competitive manner and that costs are reasonable. If the service is an on-going, regular service the Recipient should enter into a contract with the vendor for the service. This contract would outline the reimbursement rate or fee as well as the scope of services. For one-time or irregular services, a description of the work and any related materials or labor related to the work is needed.

Recipient should obtain an invoice from the vendor describing the work completed, the date of service and if necessary the address and apartment of the service. This address and unit information can be hand-written as long as initialed by a supervisor (sometimes a vendor's invoice will not include such detail). If the scope included work on a building or a specific unit, the invoice or description of work must reflect that level of detail. The description and invoice must be signed and approved by an authorized staff of the Recipient. Recipients should maintain copies of any contracts, work orders, task orders, their procurement policy, invoices, and proof of payment.

Required Documentation	<ul style="list-style-type: none"> ✓ Invoice from contractor ✓ Includes details on project or unit specifics ✓ Includes details on building wide if applicable ✓ Approved by supervisor ✓ Accurate amount reflected on LOCCS invoice ✓ Contract for services if applicable ✓ Work orders if applicable ✓ Agency procurement policy
Steps to confirm accuracy	<p>To do:</p> <ul style="list-style-type: none"> ✓ Confirm amount on invoice = amount on LOCCS invoice ✓ Did an authorized staff member approve the invoice by signature ✓ Keep organized records of work performed

Supplies and Equipment

The purchase of supplies and equipment should align with the Recipient’s procurement policy.

Supplies and equipment may be purchased on an “as needed basis” or in bulk to anticipate future needs. For example, the janitor might purchase one roll of paper towels or order boxes of paper towels for the next few months. Both methods of purchase are allowed as long as the bulk purchase is reasonable and the inventory can be secured for future eligible use during the operating year. Documentation for both types of purchases is required in order to bill the CoC program or to count the purchase as an in-kind match.

Recipients will obtain and maintain a receipt for the supplies and equipment. If building or housing unit specific a note with the address and/or unit number is needed. This information can be hand written on the receipt as long as signed or initialed by an authorized staff member. Recipients should also maintain copies of any purchase orders if applicable. For purchases that involve bulk purchases, evidence of inventory control to ensure that merchandise is kept safe and available for future use by the CoC program, and the Recipient’s procurement policy.

Supplies/Equipment	<ul style="list-style-type: none"> ✓ Receipt for supplies ✓ If program specific, note on address, unit, etc. ✓ If bulk, note on allocation plan. Same allocation as approved in Step 2. ✓ Accurate amount reflected on LOCCS invoice ✓ If bulk, inventory control process ✓ Recipient Procurement policy
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Confirm total on receipts

Mileage

At times employees must use their personal vehicles for work-related activities. This could be a case manager visiting participants in their apartments or a maintenance worker traveling to a unit to inspect a reported problem. If the Recipient pays the employee for the use of their vehicle and wants to seek reimbursement from the CoC funds or seek match credit, documentation is required.

Reimbursement for mileage must be based on the Recipient’s mileage reimbursement rate policy. The Recipient can elect to use the General Services Administration (GSA) Reimbursement Rate or their own rate as long as it does not exceed the GSA rate. For example, if the GSA rate is \$.54/mile the agency can use \$.54 or it can create its own rate of \$.50/mile as long as its own rate is less than the GSA rate. The mileage reimbursement rate factors in gas, vehicle insurance, maintenance and repairs. The mileage reimbursement rate does not factor in tolls or parking fees if applicable. These would be reimbursed as an additional cost with proper documentation. GSA rates are updated at least annually.

Staff must maintain and submit documentation of the number of miles they traveled, the purpose of the trip, the date of travel. Recipients should use a Mileage Reimbursement Form. Two sample forms are in the appendices.

Required Documentation	<ul style="list-style-type: none"> ✓ Mileage log or similar way to note miles ✓ Activity chart with note for purpose/client ✓ Proof of payment to employee
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Confirm total on mileage log(s) match total on LOCCS invoice

Subrecipient’s Own Vehicle

If the Recipient owns a vehicle and seeks mileage for the vehicle it owns, it would follow the same procedures described above including maintaining a log with date, miles, purpose, etc. The only difference would be there would be no reimbursement made to a staff person.

Required Documentation	<ul style="list-style-type: none"> ✓ Mileage log or similar way to note miles ✓ Activity chart with note for purpose/client
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Confirm total on mileage log(s) match total on LOCCS invoice

Utilities and Operating Funds

Utilities are an eligible operations expenses. Recipients can seek CoC reimbursement if they have an operations budget line item. In general utility expenses may be incurred in housing owned by the Recipient or in units leased by the Recipient. In either case, documentation is required.

Recipient will maintain copies of bills from the utility company. If these bills do not include clear information regarding the address of the housing or specific unit number, the Recipient should write that information on the bill.

Required Documentation	<ul style="list-style-type: none"> ✓ Invoice from utility company with notes on units/program. ✓ If utilities are in a unit leased by the Recipient, a copy of the lease showing that utilities are not included in the rent
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Confirm amount invoice equals amount on LOCCS invoice

NOTE: ADDITIONAL GUIDANCE ON UTILITY REIMBURSEMENTS IS PENDING

Resources

- <http://www.gsa.gov/portal/content/100715>

Furniture

Under the CoC Interim Rule, furniture is only eligible under operations and must be for the operation of the housing program. As such the furniture must be retained for use in the project and cannot be kept by program participants. Mattresses are an exception and can be retained by the program participant. Furniture cannot be purchased in units receiving rental assistance since rental assistance and operations cannot be in the same unit.

Recipient would maintain the receipt or invoice for the furniture with documentation on the address of the housing and any specific unit number, if applicable. In addition, Recipients must demonstrate a system for inventory control including when the furniture was purchased, type of furniture, date of purchase and unit where the furniture was moved. If the Recipient has a system for inspecting the furniture (e.g. an annual inspection) then a note that the inspection took place and any findings.

Required Documentation	<ul style="list-style-type: none">✓ Receipt✓ Housing address and Unit✓ Inventory control✓ Purchase order if applicable✓ Procurement policy
Steps to confirm accuracy	<ul style="list-style-type: none">✓ Confirm amount invoice equals amount on billing sheet✓ Update inventory system with the new purchase✓ Procurement policy

Food

Food is only eligible under supportive services. Eligible food costs are those related to providing meals or groceries to program participants in a specific CoC program.

Recipients may operate a meal program in different ways. The Recipient may purchase food and prepare it in a housing program that serves only program participants. In this case, the Recipient would maintain receipts for the purchased food.

Or a Recipient may have a meal program that serves food to participants from many different programs. In this case, the Recipient would determine the per meal cost by adding all food purchases and dividing by the average number of people served. It would then bill the CoC program for the number of program participants who were served meals by the per meal cost. Recipients should maintain copies of all receipts for food, a record of how it determined the average per meal cost, and a record of program participants receiving the meal.

Recipients should maintain documentation of receipts for the bulk food purchases, records of donations of food (if used for match), and demonstrate inventory control system to ensure that the food is retained and available for program participants. Menus of meals provided if applicable should be maintained.

Required Documentation	<ul style="list-style-type: none"> ✓ Receipts for food ✓ Methodology to determine per meal cost if applicable ✓ Menus, if applicable ✓ Inventory Control ✓ Proof of donations ✓ Procurement policy
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Receipts and/or per meal per program participant matches information on LOCCS

Rent

Rental Assistance and Leasing budget line items include the monthly rent payment for which the CoC program is responsible and could also include security deposits, first and last month's rent, and for rental assistance damages and vacancy payments up to 30 days following the end of the month when the unit was vacated. The Recipient of rental assistance funds (not leasing) can also use rental assistance funds to cover the rent for up to 90 days if the program participant is in an institution for up to 90 days.

Before making any rent payments the Recipient must ensure that the unit and rent amount meet certain criteria. This criteria includes: environmental review; housing quality standards; rent reasonableness; and if leasing Fair Market Rent limits. These are explained in detail beginning on page 48.

Required Documentation	<ul style="list-style-type: none"> ✓ Documentation that the rent was paid and the amount of the rent paid ✓ Copies of leases ✓ If rental assistance, rent calculation for program participant (see page 52) ✓ If leasing, rent calculation for program participant if applicable. ✓ Proof of Environmental Review, HQS, rent reasonableness
Steps to confirm accuracy	<ul style="list-style-type: none"> ✓ Compare rent rolls and amount of rent paid to the amount owed as per leases and rent calculations

Program Income and Accounting for Rental Income

In CoC-funded leasing programs, rents received by Recipients are considered to be “program income.” The following rules apply to program income:

- Funds are subject to all applicable requirements for CoC programs.
- Funds are to be used for previously approved eligible activities in the project (with one exception: Transitional housing rent may be put into client savings accounts).
- Funds are used *before* additional cash withdrawals are made from CoC Program funds.

As stated on page 22, Recipients must be careful in how any program income is treated toward match. Program income is defined as the income received by the recipient directly generated by a grant-supported activity. It includes rents and occupancy charges collected from program participants directly by recipients. Rent paid by a program participant to a private landlord is not program income since the

funds are not coming to the Recipient. When the CoC Interim Rule was published, it did not specify that program income can be used as match. This meant that the tenant share of rent or other program income, although spent on CoC eligible activities, could not be counted toward the 25 percent match.

For fiscal year 2015 and fiscal year 2016 CoC Program grants, HUD published guidance outlining that program income could be counted as cash match. Until a final clarification is made on program income and match, recipients will need to closely follow annual guidance provided by HUD through NOFAs or other means.

Ensuring Compliance with Housing Requirements

As described in Section 6, units assisted with CoC funds must meet certain housing and rent standards and conditions. Recipients should have a system in place to confirm that units for which they are seeking CoC reimbursement from HUD have met the various requirements. The following is an example of what a Recipient could use to track compliance.

Property located at: _____
Unit number (if applicable): _____
Contract rent (with landlord): _____
Fair Market Rent (FMR): _____.
Unit met rent reasonableness: <input type="checkbox"/> Yes <input type="checkbox"/> No Date: _____ (documentation attached)
Unit passed Housing Quality Standards: <input type="checkbox"/> Yes <input type="checkbox"/> No (documentation attached)
Property passed Environmental Review: <input type="checkbox"/> Yes <input type="checkbox"/> No Date: _____(documentation attached)

Section 5: Required Policies and Procedures

CoC Recipients are expected to establish and maintain policies and procedures for ensuring that CoC program funds are used in accordance with the requirements of the CoC Program interim rule. This section provides a list of required policies and procedures and a description of what is required for each.

Homeless Consumer Participation

Recipients must provide for the participation of at least one homeless or formerly homeless individual on the board of directors or other equivalent policymaking entity.

Conflicts of Interest

Recipients must have a written Conflict of Interest Policy which prohibits organizational conflicts of interest.

An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the Recipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when an employee of a Recipient participates in making rent reasonableness determinations and housing quality inspections of property that the Recipient or a related entity owns or one that the employee owns.

Code of Conduct

Recipients must maintain a written code of conduct which includes the following provisions:

- No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.
- The officers, employees, and agents of the Recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements. However, Recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.
- The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the Recipient.

Procurement Policy

Recipients must have written Procurement Policies that ensure that purchases are conducted in a manner to provide, to the maximum extent practical, open and free competition. Recipients must have procurement policies in place regarding the following types of procurements.

Small purchase procedures are used for procurements under \$25,000, and are relatively simple and informal procurement methods. Sound business practices are required for small purchases, which is met by obtaining price or rate quotations from at least three (3) qualified sources.

Procurements in excess of the small purchase threshold must be conducted using a solicitation process. Procurement records and files for purchases in excess of the small purchase threshold shall include the following at a minimum: basis for contractor selection; justification for lack of competition when competitive bids or offers are not obtained; and basis for award cost or price.

Recordkeeping: Confidentiality and Retention

Confidentiality of Records

Recipients must develop and implement written procedures to ensure:

- All records containing protected identifying information will be kept secure and confidential.
- The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the Recipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

Period of Record Retention

All records containing information related to CoC Program funds and activities must be retained and kept accessible for either 5 years or the period specified below, whichever is longer.

- Program participants' qualifications, eligibility documentation, and other program participant records must be retained for 5 years after expenditure of all funds from grant under which program participants were served.
- Records for acquisition, new construction, and rehabilitation must be retained for 15 years following the date the project is first occupied, or used, by program participants. Only those records related to the acquisition, rehabilitation, or new construction must be retained for 15 years. All other records must be retained for the period of time specified above.

Nondiscrimination and Reasonable Accommodation/Modification Policy

Recipients must have written policies regarding nondiscrimination and reasonable accommodations/modifications.

CoC Programs must operate in compliance with federal nondiscrimination and equal opportunity requirements including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. Recipients may not discriminate on the basis of actual or perceived sexual orientation, gender identity or marital status. For persons with disabilities, it is unlawful to: (1) Fail to make reasonable accommodation in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit and (2) Fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

Affirmatively Furthering Fair Housing

A Recipient must implement its programs in a manner that affirmatively furthers fair housing, which means that the Recipient must:

- Affirmatively market its housing and supportive services to eligible persons—regardless of race, color, national origin, religion, sex, age, familial status, or handicap—who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities.
- Where a Recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan.
- Provide program participants with information on rights and remedies available under applicable federal, state and local fair housing and civil rights laws.

To document compliance with the requirements to affirmatively further fair housing, Recipients must maintain copies of marketing, outreach, and other materials used to inform eligible program participants who are least likely to apply, in the absence of special outreach, for the project.

Policies Governing Faith-Based Activities

Recipients shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief, including a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice. Explicitly religious activities (such as worship, religious instruction, or proselytization) must take place separately (in time or location) from CoC-funded activities and must be voluntary for participants in CoC-funded programs. If a program participant or prospective program participant of the CoC program supported by HUD objects to the religious character of an organization that provides services under the program, that organization must undertake reasonable efforts to identify and refer the program participant to an alternative provider to which the prospective program participant has no objection.

Program Rules: Termination of Assistance to Program Participants

The Recipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy. In terminating assistance to a program participant, the Recipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- Providing written notice to the program participant containing a clear statement of the reasons for termination;
- Conducting a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Providing prompt written notice of the final decision to the program participant.

Recipients that are providing permanent supportive housing must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To comply with these requirements, Recipients must have written program rules and a termination process.

Checklist of Policies and Procedures

- ✓ Homeless Consumer Participation
- ✓ Conflicts of Interest
- ✓ Code of Conduct
- ✓ Procurement
- ✓ Recordkeeping: Confidentiality and Retention
- ✓ Nondiscrimination and Reasonable Accommodation/Modification Policy Affirmatively Furthering Fair Housing
- ✓ Policies Governing Faith-Based Activities
- ✓ Program Rules: Termination of Assistance to Program Participants

Section 6: Housing Requirements

Programs receiving leasing or rental assistance funds must ensure that certain housing related standards and requirements are met.

Housing Quality Standards

Housing leased with CoC program funds, or for which rental assistance payments are made with CoC program funds, must meet HUD housing quality standards (HQS). Before any assistance may be provided on behalf of a program participant, the Recipient must physically inspect each unit to assure that the unit meets HQS. CoC funds cannot be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the Recipient verifies that all deficiencies have been corrected.

Recipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

Recipients must retain documentation to demonstrate compliance with HQS. The HUD HQS Inspection Long Form, attached as Appendix J, can be used to document unit conditions upon move-in. The HQS Inspection Short Form, attached as Appendix K, can be used at annual inspections after the initial move-in inspection.

Suitable Dwelling Size

The dwelling unit must have at least one bedroom or living/sleeping room for each two persons.

Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. If household composition changes during the term of assistance, Recipients may relocate the household to a more appropriately-sized unit.

Lead Paint

The lead-based paint requirements are located at 24 CFR Part 35. The requirements vary for each type of grant assistance, as demonstrated in the chart below:

Lead-Based Paint Requirements under the CoC Program			
Rehabilitation Requirements	Project or Sponsor-Based Rental Assistance	Acquisition, Leasing, Services, or Operating Costs	Tenant-Based Rental Assistance
24 CFR Part 35 Subparts A, B, J, and R	24 CFR Part 35 Subparts A, B, H and R	24 CFR Part 35 Subparts A, B, K and R	24 CFR Part 35 Subparts A, B, M and R

Resources

- https://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/disclosure
- https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12345.pdf

Under Subparts H, J, K, and M, if the unit was constructed prior to 1978, the recipient is required to notify occupants, provide an EPA-approved information pamphlet on identifying and controlling lead-based paint hazards, conduct a visual assessment, and include an attachment to the lease, sublease or occupancy agreement which includes a Lead Warning Statement and confirms that the landlord has complied with notification requirements.

Furthermore, the lead-based paint regulations require conducting a visual assessment of existing paint surfaces in dwellings before leasing the unit and annually as long as assistance is provided. However, visual assessments are only triggered under certain circumstances, including:

- The unit was constructed prior to January 1, 1978; and
- A child under the age of six or a pregnant woman resides or is expected to reside in the unit.

Any zero bedroom unit, including a single room occupancy (SRO) unit would be exempt from a visual assessment.

Environmental Review

An environmental review must be conducted for all projects for which CoC funds are being requested prior to funds being committed to the project. Three levels of review are most common for CoC Program projects:

- Exempt/Categorically Excluded Not Subject to 58.5 (CENST);
- Categorically Excluded Subject to 58.5 (CEST); and
- Environmental Assessment (EA).

In projects where the program participant chooses the location of the unit, such as those offering tenant-based rental assistance or tenant-based leasing, the project is not subject to 24 CFR 58.5 and recipients will use the [Exempt/CENST form](#) to cover those units. The Exempt/CENST form is used for projects that receive CoC Program funding for operating costs (except when using these funds as a reserve for replacement costs), supportive services, or HMIS (except when using these funds to lease office space) *only*.

Sponsor-based and project-based rental assistance, project-based leasing, and acquisition projects without any associated repairs or rehabilitation are categorically excluded and subject to 24 CFR 58.5 (CEST). These projects require a higher level of review called a [Limited Scope Environmental Review](#). <https://www.hudexchange.info/resource/3800/limited-scope-environmental-review-coc/>

For projects that include major rehabilitation, conversion of land use, or new construction or demolition of more than four units, the project would have to undergo an [Environmental Assessment](#).

Resources

- <https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/>
- <https://www.hudexchange.info/resource/3800/limited-scope-environmental-review-coc/>
- <https://www.hudexchange.info/resource/3140/part-58-environmental-assessment-form/>

Rehabilitation Requirements	Project or Sponsor-Based Rental Assistance	Tenant-Based Rental Assistance, Operating*, supportive services or HMIS**
Environmental Assessment	CEST	CENST *except if used for replacement reserve fund ** except when using funds to lease office space

Environmental reviews are completed by a Responsible Entity, which is a unit of state or local government that assumes responsibility for the environmental review under 24 CFR part 58. Only a unit of state (Rhode Island Housing) or local government may act as a Responsible Entity; therefore nonprofit recipients must work with their state or local governments to complete environmental reviews for their activities. In very limited circumstances, HUD may perform environmental reviews for CoC projects if no responsible entity can be found.

For more information, recipients or subrecipients should review the [Environmental Review Flow Chart](#) and the [Environmental Review FAQs](#) on the HUD Exchange.

Lease Requirements

Under the CoC Program, all PH projects, including PSH and RRH, are required to utilize leases or subleases with program participants. TH projects are allowed to use leases or subleases and, under certain circumstances, may use an occupancy agreement depending on the type of CoC funding.

In projects that receive grant funds for leasing, recipients or subrecipients execute a lease with the landlord and subsequently execute a sublease or occupancy agreement with the program participant, depending on the project type. A lease in which all three names are on the lease – program participant, recipient or subrecipient, and landlord – is also allowable.

In projects funded with TBRA or PBRA, program participants execute a lease directly with the landlord, and the recipient or subrecipient executes a separate contract with the landlord to govern the subsidy payment. In projects funded with SBRA, the recipient or subrecipient contracts with a sponsor, who locates and rents housing units. The sponsor then subleases the units to program participants.

Resources

- <https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>
- <https://www.hudexchange.info/faqs/crosscutting-requirements/environmental-review/>

The chart below outlines the different lease or occupancy agreement requirements for each project type.

Type of CoC Funding				
Type of CoC Project	Rental Assistance			Leasing
	TBRA	PBRA	SBRA	
Permanent Supportive Housing	Must use a lease	Must use a lease	Must use a lease or sublease	Must use a lease or sublease
Rapid Re-housing	Must use a lease	Cannot use PBRA funds in RRH	Cannot use SBRA funds in RRH	Cannot use Leasing funds in a RRH project
Transitional Housing	Must use a lease	Must use a lease	Must use a lease	May use an occupancy agreement

In PSH and RRH, leases and subleases must:

- Have an initial term of at least one year,
- Be renewable upon expiration for terms that are a minimum of one month long (except on prior notice by either party); and
- Be terminable only for cause.

In TH, occupancy agreements, leases, and subleases used must:

- Have a term of at least one month; and
- Be automatically renewable upon expiration, up to a maximum term of 24 months.

Remember, occupancy agreements may be used only in TH projects that receive leasing funds. Communities should use their own local standards for determining what is defined as an occupancy agreement. Landlord-tenant laws vary widely across the country; therefore, HUD recommends that recipients and subrecipients contact their attorney or other legal professional to ensure their documents comply with local requirements.

Resources

- A sample “Rent Reasonableness Checklist and Certification” form is available at: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc. This sample form is used across different housing programs.

Section 7: Unit Rent and Rent Calculations

There are two different ways to discuss rent. The first is the rent that a private landlord charges for a housing unit (“Unit Rent”). The second is the rent or occupancy charge that a program participant is required to pay (Program Participant Rent).

CoC Leasing and Rental Assistance funds can be used to rent housing units from private landlords. Recipients need to review the rent against two different standards: Fair Market Rent (FMR) and Rent Reasonableness.

Unit Rent and Fair Market Rents (FMR)

HUD establishes Fair Market Rents (FMRs) to determine payment standards or rent ceilings for HUD-funded programs that provide housing assistance. FMRs are published annually – around October 1 – in the Federal Register and are available [online](#). [October 1, 2016 FMRs are in the back of this section](#). FMRs are set for different size units, and are gross rent estimates. They include rent plus the cost of all utilities.

FMRs and CoC Leasing Funds

The amount of CoC Program leasing funds **cannot** exceed the current published FMR for the relevant geographic area and cannot exceed rent reasonableness (see below).

However, recipients with leasing funds may use non-CoC Program funds to pay for the difference between FMR and the unit rent as long as the unit rent is reasonable.

If utilities are not included in the unit rent, then the recipient must take the FMR and subtract out a utility allowance to address those utilities not covered.

FMRs and CoC Rental Assistance

The amount of CoC Program rental assistance funds used to pay the rent may exceed the current FMR for that unit size and location; as long as the unit rent is reasonable (see below).

Recipients of rental assistance funds do not need to seek a waiver from HUD to pay for units above FMR with their rental assistance funds. Even though a waiver is not needed, projects with unit rents in excess of the FMR must also be able to fulfill the project commitment to serve the number of participants and fund the rent for the number of units as outlined in the project’s grant agreement. Recipients who choose to pay above the FMR must establish strong financial management tracking systems to ensure that the project can meet its full commitment.

Unit Rent and Rent Reasonableness

HUD’s rent reasonableness standard is designed to ensure that rents paid with CoC Program leasing and rental assistance funds are reasonable in relation to rents charged for comparable unassisted units in the same market.

Recipients are required to have a protocol in place to ensure that compliance with rent reasonableness standards is documented prior to executing the lease for an assisted unit. Under the CoC Program, all units and structures for which rent is paid with grant funds **must be reasonable**.

Recipients determine rent reasonableness by considering the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities provided by the landlord.

To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, consider the entire housing cost: rent plus the cost of any utilities that are, according to the lease, the responsibility of the participant. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite television service, and internet service should be excluded.

Recipients are responsible for determining what documentation is required in order to ensure the rent reasonableness standard is met for a particular unit.

Comparable rents can be determined by using a market study of rents charged for units of different sizes in different locations, or by reviewing advertisements for comparable rental units. For example, a program participant's case file might include the unit's rent and description, a printout of three comparable units' rents, and evidence that these comparison units share the same features (location, size, amenities, quality, etc.). Another acceptable method of documentation is written verification signed by the landlord or management company, on the organization's letterhead, affirming that the rent for a unit assisted with CoC Program funds is comparable to current rents charged for similar unassisted units managed by the same owner.

Recipients should assess leased units **annually** to determine if the rent continues to meet rent reasonableness standards and falls within the local FMR.

A sample rent reasonableness form can be found at:

https://portal.hud.gov/hudportal/documents/huddoc?id=19671_rentreasonableche.pdf

Remember:

With CoC Leasing funds: unit rent must be reasonable and CoC leasing funds cannot exceed the current FMR.

With CoC Rental Assistance: unit rent must be reasonable and CoC rental assistance funds may exceed the current FMR.

Rent Calculations and Income Certification

Projects receiving CoC leasing and/or operating funds

Where Recipients use CoC operating or leasing funds for units occupied by program participants, Recipients are not required to impose rent or occupancy charges on program participants as a condition of residing in the housing. However, if rent/occupancy charges are imposed, they may not exceed the highest of:

- 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);
- 10 percent of the family's monthly income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

Projects receiving CoC Rental Assistance

Where recipients use CoC rental assistance funds in a PSH or TH project, the program participant on whose behalf rental assistance payments are made must pay a contribution toward rent, which shall be the maximum of:

- 30 percent of the family's monthly adjusted income (adjustment factors include the number of

- people in the family, age of family members, medical expenses, and child-care expenses);
- 10 percent of the family's monthly income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically
- designated by the agency to meet the family's housing costs, the portion of the payments that is
- designated for housing costs.

Rapid Rehousing Projects

CoC Rapid Rehousing projects have greater flexibility in how they determine what rental assistance a participant will receive and thereby what rent payment a recipient is required to make. In setting rent payment requirements, the RRH project must follow the written policies and procedures established by the Continuum of Care for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance, as well as the amount or percentage of rent that each program participant must pay. The Written Standards allow the CoC and Recipient to set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance. The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

Calculation of Income Occupancy Charges/Rent

As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the Recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment. Recipients or subrecipients must keep track of all certifications and documentation.

Recipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income or in family composition (e.g., birth of a child) are identified.

Adjusted income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Documentation of adjusted income and rent calculations must be kept in the participant's file.

Project Sponsors must keep the following documentation of annual income:

- Source documents (e.g., most recent wage statements, unemployment compensation statements, public benefits statements, bank statements) for the assets held by the program participants and income received before the date of the evaluation;
- To the extent that source documents are unobtainable, written statements by the relevant third parties (e.g., employer, government benefits administrator) or written certification by the Project Sponsors' intake staff of the oral verification by the relevant third party of the program participant's income over the most recent period; or

- To the extent that source documents and third-party verification are unobtainable, written certification by the program participants of the amount of income that the program participants are reasonably expected to receive over the three-month period following the evaluation.

When to determine income

The requirements are different for projects receiving leasing and rental assistance for when to determine a participant's income. For leasing income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

For rental assistance as it relates to rent and not occupancy charges, recipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.

Verification. As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment.

Step 1: Calculate Maximum Participant Contribution

The rent contribution the participant must pay when the recipient is providing rental assistance in TH or PSH or in leasing and operating projects the maximum amount a program participant can be charged (in leasing and operating it can be less than the maximum). (Rounded to the nearest dollar):

- 30 percent of the family's monthly adjusted income (as outlined at Part 5.609 and 5.611(a));
- 10 percent of the family's monthly gross income; or If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

Please keep in mind that for TH and PSH projects in which rental assistance is provided, the rent contribution is not optional and must equal the rent contribution specified above.

For projects that provide TH or PSH using funds other than rental assistance funds, the occupancy charge is optional and can be lower but not higher than the maximum occupancy charge specified above

Step 2: Determine the Utility Allowance

When some or all utilities are not included in the rent, the recipient must apply a utility allowance to reduce the amount of rent the program participant would pay. For the purposes of determining the reasonable monthly utility consumption, recipients or subrecipients must use the local PHA's schedule of utility allowances, which are based on unit size and the utilities the program participant is expected to pay. Contact your local PHA to obtain the schedule of utility allowances and

exception utility allowances.

Step 3: Calculate Final Program Participant Payment Obligation

Take the maximum calculation from Step 1 and if applicable subtract out the utility allowance from Step 2 to determine the final program participant payment (for TH and PSH rental assistance projects this is the Final Payment and for leasing and operating projects it represents the maximum amount a program participant can be charged).

Determining Income involves itemizing the program participant's income and subtracting from the deductions that the program participant is eligible to receive.

The following two pages offer a condensed guidance on income to include and to exclude. The third page shows a sample rent calculation spreadsheet. This spreadsheet is available as an excel document as well. Recipients may also use the income and rent calculator at www.onecpd.info/incomecalculator and include a print-out of the tool's downloadable Rental Assistance Summary.

Depending on the number of rent calculation certifications a recipient anticipates conducting, software is available to facilitate this certification process. In addition, professional training is available (typically geared toward the Housing Choice Voucher Program) that recipients can identify and send their staff to. This income certification process is complicated and can involve significant nuances related to which income to include and which deductions to apply. Recipients need to make sure their staff are well trained to carry out the rent calculation process or partner with another agency that may perform this responsibility more frequently (e.g. a local Public Housing Agency).

Annual income includes:

- (1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
- (2) The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits and other similar types of periodic receipts, including lump sum payment for delayed start of a periodic payment;
- (3) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay;
- (4) Welfare assistance. Welfare or other payments to families or individuals, based on need, that are made under program funded, separately or jointly, by Federal, State or local governments (e.g. Social Security Income (SSI) and general assistance available through state welfare programs);
- (5) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling;
- (6) Net income from the operation of a business or profession;
- (7) Interest, dividends, and other net income of any kind from real and personal property;
- (8) All regular pay, special pay and allowances of a member of the Armed Forces, except special hostile fire pay.

Income that Must Be Excluded

Annual income does not include:

- (1) Income from employment of children (including foster children) under the age of 18 years;

- (2) Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the tenant family, who are unable to live alone);
- (3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property;
- (4) Amounts received by the family, that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- (5) Income of a live-in aide as defined in Sec. 813.102;
- (6) The full amount of student assistance paid directly to the student or to the educational institution;
- (7) Amounts received under training programs funded by HUD;
- (8) Amounts received by a disabled person that are disregarded for a limited time for purposes of SSI income eligibility and benefits because they are set aside for use under a Plan for Achieving Self-Support (PASS); or
- (9) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
- (10) A resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;
- (11) Compensation from state or local employment training programs and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance;
- (12) Temporary, non-recurring or sporadic income (including gifts);
- (13) For all initial determinations and reexaminations of income carried out on or after April 23, 1993, reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- (14) Earnings in excess of \$480 for each full time student 18 years old or older (excluding the head of household and spouse);
- (15) Adoption assistance payments in excess of \$480 per adopted child;
- (16) Deferred periodic payments of SSI income and social security benefits;
- (17) Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;
- (18) Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;
- (19) Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that included assistance under the U.S. Housing Act of 1937:
 - a. The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b));
 - b. Payments to volunteers under the Domestic Volunteer Service Act of 1973 (42 U.S.C.5044, 5058);
 - c. Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626);

- d. Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e);
- e. Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f));
- f. Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b));
- g. Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Public Law 94-540, 90 Statute 2503-2504);
- h. The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims (25 U.S.C. 1407-1408) or from funds held in trust for an Indian tribe by the Secretary of Interior (25 U.S.C. 117);
 - i. Scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs that are
- i. made available to cover the costs of tuition, fees, books, equipment, materials, supplies, transportation, and miscellaneous personal expenses of a student at an educational institution (20 U.S.C.1087uu);
- j. Payments received from programs funded under Title V of the Older Americans Act of 1965 (U.S.C. 3056(f));
- k. Payments received after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.); and
- l. Payments received under Maine Indian Claims Settlement Act of 1980 (Pub.L. 96-420, 94 Statute 1785);
- m. Earned income tax credit refund payments received from the Internal Revenue Service on or after January 1, 1991. Payments may be received in a resident's regular pay or as a single sum payment;
- n. Payments received as AmeriCorps Living Allowances (29 U.S.C. Sec.1552);
- o. Payments received under WIC-Supplemental Food Program for Women, Infants, and Children;
- p. Payments received under the National School Lunch Program (42 U.S.C. 175-176);
- q. Payments received under the Child Nutrition Act (42 U.S.C. 1771-1778);
- r. Payments received under the Child Care Block Grant Act of 1990.

Program Participant Rent Calculation Worksheet

1.	Annual income from all sources	\$
2.	Income Exclusions	\$
3.	Annual Income	\$
Calculating Adjusted Income: Dependent Allowance		
4.	Number of Dependents	\$
5.	Multiply line 4 by \$480	\$
Calculating Adjusted Income: Child Care Allowance		
6.	Anticipated Unreimbursed Expenses for Care of Children	\$
Calculating Adjusted Income: Disabled Assistance Allowance		
7.	Disabled Assistance Expenses	\$
8.	Multiply line 3 by 0.03	\$
9.	Subtract Line 8 from Line 7	\$
10.	Family Member Earnings which were dependent on the disabled assistance expenses	\$
11.	Lesser of Lines 9 or 10	\$
Calculating Adjusted Income: Medical Expenses/Elderly Family Allowances		
12.	List Total for Medical Expenses	\$
13.	If Line 9 > 0, enter amount from Line 12; Otherwise add Line 7 and 12 and subtract Line 8.	\$
14.	Elderly/Disabled Allowance (Enter \$400, if applicable)	\$
Adjusted Income		
15.	Total Income Adjustments (Add Lines 5, 6, 11, 13 and 14)	\$
16.	Adjusted Income (Subtract Line 15 from Line 3)	\$
Resident Rent Determination		
17.	30% of Monthly Adjusted Income (Divide Line 16 by 12 and multiply by 0.3)	\$
18.	10% of Monthly Income (Divide Line 3 by 12 and multiply by 0.1)	\$
19.	Portion of welfare payment designated by the agency to meet the family's housing cost, if applicable	\$
20.	Enter the Largest of Lines 17, 18 or 19. This is the amount per month that may be charged for resident rent in a CoC Rental Assistance Program and the maximum amount that may be charged to a program participant in a CoC leasing or operations funded project.	\$
Determining Resident Rent for Units where Utilities are not included in Rent		
21.	Utility Allowance (obtain from local PHA)	\$
22.	Resident Rent (Subtract Line 21 from Line 20)	\$
23.	Utility Reimbursement (only if Line 22 < 0)	\$

Section 8: Reporting and Recordkeeping

Service and Case Management

Recipients must keep records for each program participant that documents the services and assistance provided to the program participant, including evidence that the Recipient:

- Conducted an annual assessment of services for program participants who remain in the project for more than a year,
- Adjusted the service package accordingly, and
- Provided case management services not less than once per month to program participants receiving rapid re-housing.

In addition, as discussed on page 37, Recipients billing staff time to supportive services must keep case notes. Case notes can be electronic or paper.

Records of Reasonable Belief of Imminent Threat of Harm

For each program participant receiving tenant-based rental assistance who has moved to a different CoC in response to imminent threat of further domestic violence, dating violence, sexual assault, or stalking per 24 CFR part 578.51(c)(3), each Recipient must retain the following:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file.
- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking.

HMIS

Recipients of CoC grants are required to regularly submit client-level data to the CoC's Homeless Management Information System (HMIS), except for victim service providers, who are not permitted to enter data into HMIS, and legal service providers, who may choose not to use HMIS if it is necessary to protect attorney-client privilege. Victim service providers and legal service providers are required to establish and operate a comparable database that complies with HUD standards.

Annual Performance Report (APR)

The Annual Performance Report (APR) is due to HUD no later than 90 days after the end of the program grant year. Recipients must understand the steps to obtain APR data from HMIS and submit the completed APR to HUD before the 90-day deadline. HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if the recipient fails to submit an APR in a timely manner for the grant year immediately prior to renewal, or the recipient submits an APR that HUD deems unacceptable or that shows non-compliance with the requirements of the grant and the CoC Program interim rule.

Additional CoC Reports

The Rhode Island Continuum of Care may request additional reports and information from Recipients as part of its oversight of CoC funded projects and/or its requirement to rank projects in the CoC Competition. Recipients must meet the reporting requirements of the CoC.

Match Documentation

Cash Match

Recipient: _____

Program Name: _____ Grant #: _____

Required Match: _____

Total CoC budget (less leasing): \$ _____ x .25 (25%) = _____ (required match)

Source	Amount	CoC Eligible Activity	Proposed Timeframe for spending funds
Total Cash Match:			

Note: In the Proposed Timeframe for spending funds, please indicate specifics such as: Will use cash to cover % of costs on a monthly basis; will use cash to support 100% of costs for the period Date to Date, etc.

In Kind Match

Source	Amount	CoC Eligible Activity	Proposed Timeframe for spending funds
Total in kind Match:			

Note: In the Proposed Timeframe for spending funds, please indicate specifics such as: is the in kind donation a onetime donation? Is it an on-going service and if so, the frequency of the donation/service. If the in kind match is on supportive services, you must have an MOU regarding this match and the related services. Submit these MOUs with the Project Profile.

Total Cash Match: _____

Total In kind Match: _____

Total Match: _____ (Cash + In Kind)

Semi-Annual Certification

Employees who are supported solely by CoC Grant and One BLI

Subrecipient: _____

Program Name: _____ Grant #: _____

Employee Name: _____

CoC Program Name: _____

Certification Period: _____ to _____

Subpart A 200.430 (i) requires employees who are compensated by federal grant dollars and work **solely** on a federal award to submit at least semi-annual certifications that the employee worked solely on that program.

Subpart A 200.430 (i) Where employees are expected to work solely on a single Federal award or cost objective, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications will be prepared at least semi-annually and will be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

I, _____ certify that 100% of my work time from

MM/DD/YYYY to MM/DD/YYYY was spent on _____ duties and responsibilities for the above noted program and grant number.

Employee Signature

Date

Supervisor Signature

Date

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. statements code title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)

Employee Name:

Subrecipient Name

Address

City, State

Day: Date:	1st Week							2nd Week						
	Sunday 01/00/00	Monday 01/01/00	Tuesday 01/02/00	Wednesday 01/03/00	Thursday 01/04/00	Friday 01/05/00	Saturday 01/06/00	Sunday 01/07/00	Monday 01/08/00	Tuesday 01/09/00	Wednesday 01/10/00	Thursday 01/11/00	Friday 01/12/00	Saturday 01/13/00
Summary of Work Hours														
<u>Direct Program/Grant/Contract Activities</u>														
Program Area 1:						-								
Program Area 2:						-								
Program Area 3:		-												
Program Area 4:		-												
Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Summary of Non-Work Hours - Release Time														
Annual Leave		-	-	-	-	-								
Sick Leave														
Holiday														
Lunch/Breaks														
Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Employee Signature :

Date :

Date: _____

Supervisor Signature: _____

Date: _____

Bi-Weekly Time and Effort Report

Agency Name ABC Agency

Staff or Volunteer Name: Jane Doe
 Employee Position/Title: Case Manager
 Name of Supervisor: Carol Collins
 Supervisor Position Title: Asst. Director

Day of Week Ending Pay Period: Saturday
 Pay Period End Date: 8/15/2015

Hours Worked by Project	CoC Eligible Task Number	Day of Week Date							Total Hours Worked
		Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
Other Projects:									0.00
									0.00
	Subtotal Other Fed.								0.00
Activities Paid with Agency Funds (including ineligible federal activities.)									0.00
									0.00
	Subtotal Ineligible Fed.								0.00

Hours Worked by Project	CoC Eligible Task Number	Day of Week Date							Total Hours Worked
		Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
CoC Project Name:									0.00
									0.00
	Subtotal CoC Project								0.00
Other Federal Projects:									0.00
									0.00
	Subtotal Other Fed.								0.00
Activities Paid with Agency Funds (including ineligible federal activities.)									0.00
									0.00
	Subtotal Ineligible Fed.								0.00

Paid Time Off								
Annual Leave							0.00	
Sick Leave						0.00	0.00	
Holiday			0.00				0.00	
Lunch							0.00	
							0.00	
	Subtotal Leave							0.00
Leave Without Pay							0.00	

Week 1 Overall Total: **0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00**

Paid Time Off								
Annual Leave							0.00	
Sick Leave							0.00	
Holiday							0.00	
Leave, Other:							0.00	
							0.00	
	Subtotal Leave							0.00
Leave Without Pay							0.00	

Week 2 Overall Total: **0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00**

CoC Eligible Activities	
(1) Assessment of Service Needs 578.53(1)	(9) Mental Health Services (578.53(11)
(2) Case Management 578.53(3)	(10) Outpatient Health Services (578.52(12)
(3) Child Care 578.53(4)	(11) Outreach Services 578.53(13)
(4) Education Services 578.53(5)	(12) Substance Abuse Treatment Services 578.53(14)
(5) Employment Assistance 578.53(6)	(13) Transportation 578.53(15)
(6) Housing/Counseling Services 578.53(8)	(14) Maintenance/Repair 578.55(b)(1)
(7) Legal Services (578.53(9)	(15) Building Security 578.55(b)(4)
(8) Life Skills 578.53(10)	(16) Administration 578.59(1)

By signing below, I certify that the time recorded is a true and accurate reporting of my attendance for the period indicated.

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Maintenance Check list

Staff person: _____

Date: _____

Hours worked: _____

General Floor hallways and aisles

- Daily, dry mop, Wet mop hard surfaces
- Daily, vacuum, spot clean carpeted surfaces
- Weekly, Change Matting
- Monthly, buff/burnish hard surfaces
- Monthly, Damp refresh carpeted areas
- Semi-Annually, shampoo/extract carpeted surfaces
- Semi-Annually, Clean and wax vinyl tile surfaces

Restroom Cleaning

- Daily Clean and sanitize Restroom Floors – Sweep, damp mop with a germicidal solution
- Clean and Sanitize Sinks and Countertops
- Spot clean stall walls and doors, report inappropriate graffiti to security.
- Empty trash, spot clean containers, reline with appropriate size trash bag
- Clean Restroom mirrors
- Clean/Disinfect Dispensers restock all dispensers
- Spot Clean/Disinfect Walls / doors
- Clean all horizontal surfaces.

Common areas

- Empty trash as required, spot clean containers, reline with appropriate size trash bag
- Remove debris from tables and shelves and sanitize
- Sweep and sanitize floor surfaces
- Clean, with disinfectant, all phones/tables.
- Weekly, Scrub floor surfaces
- Semi-Annually, Scrub and recoat floor surfaces

Window cleaning

- Daily-Spot clean all interior windows in the common area.
- Weekly – Clean Sills in common areas

Non-routine requests

- Provide cleaning of “meeting” rooms in between scheduled use.
- Provide additional attention to lobby and entrance areas during poor weather conditions.
- Provide spill cleanup as needed

Exterior

- Sweep sidewalk and remove trash/debris
- Shovel/snow blower
- Ensure removal of ice/disperse rock salt as needed.

Date: _____

Location/Program: _____

Employee: _____

Common Areas of the Building	
<input type="checkbox"/> Clean and Mop building floors <input type="checkbox"/> Gather and empty trash <input type="checkbox"/> Inspect public areas <input type="checkbox"/> Replace lightbulbs <input type="checkbox"/> Replace, repair smoke detectors <input type="checkbox"/> _____ (other)	<input type="checkbox"/> Paint <input type="checkbox"/> Snow removal <input type="checkbox"/> Mow and trim lawns and shrubbery <input type="checkbox"/> Minor repairs to HVAC <input type="checkbox"/> Spray insecticides and fumigants <input type="checkbox"/> _____ (other)
Total time on Common areas:	

Unit Assistance	Note: Unit #
<input type="checkbox"/> Respond to request for services/inspect unit <input type="checkbox"/> Spray insecticides and fumigants <input type="checkbox"/> Inspect report of broken appliance <input type="checkbox"/> Inspect heat complaint and trouble shoot <input type="checkbox"/> Replace, repair smoke detectors <input type="checkbox"/> _____ (other)	<input type="checkbox"/> Paint <input type="checkbox"/> Inspect broken light/replace bulbs <input type="checkbox"/> Inspect and respond to leaking plumbing <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other)
Total time on Unit:	

Unit Assistance	Note: Unit #
<input type="checkbox"/> Respond to request for services/inspect unit <input type="checkbox"/> Spray insecticides and fumigants <input type="checkbox"/> Inspect report of broken appliance <input type="checkbox"/> Inspect heat complaint and trouble shoot <input type="checkbox"/> Replace, repair smoke detectors <input type="checkbox"/> _____ (other)	<input type="checkbox"/> Paint <input type="checkbox"/> Inspect broken light/replace bulbs <input type="checkbox"/> Inspect and respond to leaking plumbing <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other)
Total time on Unit:	

Unit Assistance	Note: Unit #
<input type="checkbox"/> Respond to request for services/inspect unit <input type="checkbox"/> Spray insecticides and fumigants <input type="checkbox"/> Inspect report of broken appliance <input type="checkbox"/> Inspect heat complaint and trouble shoot <input type="checkbox"/> Replace, repair smoke detectors <input type="checkbox"/> _____ (other)	<input type="checkbox"/> Paint <input type="checkbox"/> Inspect broken light/replace bulbs <input type="checkbox"/> Inspect and respond to leaking plumbing <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other)
Total time on Unit:	

Unit Assistance	Note: Unit #
<input type="checkbox"/> Respond to request for services/inspect unit <input type="checkbox"/> Spray insecticides and fumigants <input type="checkbox"/> Inspect report of broken appliance <input type="checkbox"/> Inspect heat complaint and trouble shoot <input type="checkbox"/> Replace, repair smoke detectors <input type="checkbox"/> _____ (other)	<input type="checkbox"/> Paint <input type="checkbox"/> Inspect broken light/replace bulbs <input type="checkbox"/> Inspect and respond to leaking plumbing <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other) <input type="checkbox"/> _____ (other)
Total time on Unit:	

	General Building Areas			Individual Units(#)

Notes: _____

Date: _____
 Location/Program: _____
 Employee: _____

	General Building Areas			Individual Units(#)

Notes: _____

Date: _____
 Location/Program: _____
 Employee: _____

	General Building Areas			Individual Unit (#)

Notes: _____

Continuum of Care Maintenance Log

Agency Name: _____

Employee Name: _____

Reporting Month: _____

Employee Title: _____

Date	CoC Project Name	CoC Facility Address	Description of Maintenance Activity	Start Time	End Time	Total Hours

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise.

Print Employee Name

Employee Signature

Date

Print Authorizing Official Name

Authorizing Official Signature

Date

Continuum of Care Transportation Log: Personal Vehicle Use

Agency Name: _____ Employee Name: _____ Vehicle Make/Model: _____

Reporting Month: _____ Employee Title: _____ License Plate: _____

Date	CoC Project Name	Trip Start (Address)	Trip Finish (Address)	Purpose/Client Identifier if applicable	Distance Traveled	Parking/Toll Fare

Employee Signature: _____

Supervisor Signature: _____

Mileage Reimbursement Form

Employee Name: _____

CoC Program: _____

Date: _____

Purpose:

Number of Miles: _____

Agency Reimbursement Rate: _____

Total Reimbursed to Employee: _____

Summary of Lease/Occupancy Agreement Requirements

Component	CoC Funding	Lease/Sublease	Occupancy Agreements
PH-PSH	Rental Assistance	Required	Not Allowed
PH-PSH	Leasing	Required	Not Allowed
PH: RRH	Rental Assistance	Required	Not Allowed
TH	Rental Assistance	Required	Not Allowed
TH	Leasing	Allowed	Allowed

