

OR-506CoC Hillsboro/Beaverton/Washington County, Oregon  
**CoC Program Administration and Monitoring**

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Policy No.:	578.103-OR506CoC	Approved By:	HSSN (the CoC)
Effective Date:	2005	Revision Date:	February 24, 2020
Prepared By:	Washington County Department of Housing Services 503-846-4760 <a href="http://www.co.washington.or.us/Housing/EndHomelessness/">http://www.co.washington.or.us/Housing/EndHomelessness/</a>		

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**Policy Authority:** This policy is adopted under the authority of the local Continuum of Care (CoC) in Washington County, commonly referred to as the Housing and Supportive Services Network (HSSN).

**Purpose:** To effectively administer the federal grant funds, specific standards for operating and managing the CoC Program are defined to include general recordkeeping requirements, fiscal management, program participant records, and enforcement procedures.

**Standard:** Grant recipients and subrecipients under the Continuum of Care (CoC) Program are required to show compliance with regulations through appropriate program implementation, administration, and recordkeeping.

**Scope:** Recipients and subrecipients of CoC Program funds, the CoC Collaborative Applicant, and the HMIS Lead.

**Authority For Code:** Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Code of Federal Regulation (CFR) for the CoC Program 24 CFR Part 578, Subpart G Grant Administration, and the Office of Management Budget (OMB) to include OMB Guidance for Grants and Agreements 2 CFR 200; Audits of States, Local Government and Non-profit Organizations 24 CFR Part 85; the Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846); the Section 3 of the Housing and Urban Development Act 24 CFR Part 135; and Environmental review activities subject to 24 CFR Part 50.

**Responsibilities:**

**1. DEFINITIONS**

1.1 **Collaborative Applicant** is defined to mean an instrumentality of state or local government, local government, nonprofit, state, or public housing authority that has been designated by the Continuum of Care to collect the required application information from all projects within the geographic area of the Continuum and apply for a grant.

1.2 **Recipient** is defined to mean an applicant that signs a grant agreement with the U.S. Department of Housing and Urban Development (HUD), as defined in Section 424 of the McKinney-Vento Act.

1.3 **Subrecipient** is defined to mean a private nonprofit organization, State or local government, or instrumentality of a State or local government that receives a subgrant

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from the recipient to operate a project. The definition of “subrecipient” is consistent with the definition of “project sponsor” found in Section 401 of the McKinney-Vento Act.

### 2. PROGRAM MONITORING

The Washington County Department of Housing Services (the Collaborative Applicant), will establish and maintain standard procedures for ensuring that Continuum of Care (CoC) Program funds are used in accordance with federal requirements, and will establish and maintain sufficient records to enable the U.S. Department of Housing and Urban Development (HUD) to determine whether the recipient and its subrecipients are meeting the requirements of 24 CFR Part 578.

To support this role and responsibility, CoC Program monitoring activities will include financial and program compliance outlined in 24 CFR Part 578 identified in this policy and the supporting CoC Program Monitoring Checklist found in the Appendices.

The United States Department of Housing and Urban Development (HUD) maintains responsibility for monitoring all CoC recipients, and this will include monitoring a sample of subrecipients when a recipient is selected for HUD program monitoring.

### 3. ADMINISTRATION AND GENERAL RECORDKEEPING

Administration and recordkeeping activities include, but are not limited to:

#### 3.1 Continuum of Care Records (24 CFR 578.103(a)(1))

As the jurisdiction’s CoC Collaborative Applicant, the Washington County Department of Housing Services will maintain documentation relating to establishment and operations of the local Continuum of Care (CoC), as governed by the Washington County Housing and Supportive Services Network (HSSN).

#### 3.2 Program Records (24 CFR 578.103(a)(3 through 17))

Recipients and subrecipients will maintain documentation relating to implementation and operations of CoC Program projects, to include:

- a) *Homeless Status* – Documentation of literal homelessness as defined in 24 CFR Part 576.500(b).
- b) *At Risk of Homeless Status* – Documentation that establishes “at risk of homelessness” status of each individual or family who receives homelessness prevention assistance as defined in 24 CFR Part 576.500(c).
- c) *Reasonable Belief of Imminent Threat of Harm* – Documentation for people who moved to a different Continuum of Care (region) due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under 24 CFR Part 578.51(c)(3).
- d) *Annual Income* – Perform initial, and at least annually thereafter, a review of income for people receiving housing assistance where rent or occupancy charge is paid by the program participant. The annual income review will be performed in compliance with 24 CFR Parts 578.77 Calculating Occupancy Charges and Rent and 578.103(a)(6) Annual Income, and will be entered in HMIS using the anniversary of the program entry date that is established “when the fiscal payment of rent begins

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- (first date of Housing Assistance Payment)” regardless of the date when the actual income review was completed as long as this review was no sooner than 30 days prior to the anniversary date and no later than 30 days following the anniversary date. The supporting income documentation will be retained in the participant case file, and may be uploaded into HMIS for agencies using electronic filing.
- e) *Program Participant Records* – Documentation for each program participant receiving services, an annual assessment of services for those program participants that remain in the program for more than a year, and compliance with the termination of assistance requirements under 24 CFR 578.91.
  - f) *Housing Standards* - Documentation of compliance with the housing quality standards (HQS), to include inspection reports under 24 CFR 578.75(b).
  - g) *Services Provided* – Documentation of supportive services provided under the recipient or subrecipients program and the amounts spent on those services, to include the annual assessment of services for participants and that the service package offered to program participants was adjusted, as applicable.
  - h) *Match* – Records of the source and use of contributions made to satisfy the match requirement in 24 CFR 478.73, to include the records of match provided by subrecipients. The record will show how the value placed on third party in-kind contributions was derived.
  - i) *Conflicts Of Interest* – Documentation to show compliance with organizational conflict-of-interest requirements.
  - j) *Homeless Participation* – Documentation to show compliance with the homeless participation requirements.
  - k) *Faith-based Activities* – Documentation to show compliance with the faith-based requirements under 24 CFR 578.87(b), as applicable.
  - l) *Affirmatively Furthering Fair Housing* – Maintain marketing, outreach and other materials used to inform eligible persons of the program to document compliance with the requirements in 24 CFR 578.93(c).
  - m) *Other Federal Requirement* – Documentation in support of compliance with 24 CFR 578.99, as applicable. [www.fsr.gov](http://www.fsr.gov)
  - n) *Subrecipients And Contractors* – The recipient will retain copies of all solicitations from and agreements with subrecipients, records of payment requests and payments, and documentation of monitoring findings with corrective actions and sanctions of subrecipients, as applicable.
  - o) *Other Records Specified by HUD* - Other documentation defined in 24 CFR 578.103(a)(17).

### 3.3 Confidentiality (24 CFR Part 578.103(b))

In addition to meeting the specific confidentiality and security requirements for HMIS data, the recipient and subrecipient will establish written procedures to ensure records containing program participant identifying information are kept secure and confidential, address or location of violence program site will not be made public, and the address or location of any housing of a program participant will not be made public.

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### 3.4 Record Retention (24 CFR Part 578.103(c))

All records pertaining to CoC Program funds must be retained for the greater of 5 years from grant close-out, and 15 years from the date first occupied for acquisition, construction, and/or rehabilitation programs.

### 3.5 Access To Records (24 CFR Part 578.103(d))

All records are subject to Federal and public rights as outlined in this rule. Notwithstanding the confidentiality procedures, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the CoC Program grant audits, examinations, excerpts, and transcripts.

### 3.6 Reports (24 CFR Part 578.103(e))

In addition to reports outlined in 24 CFR parts 84 and 85, the recipient must collect and report data on CoC Program funds in an Annual Performance Report (APR), as well as any additional reports required by HUD.

### 3.7 Financial Management

Monitoring of CoC Programs will include internal controls to include:

- a) Documentation demonstrating compliance with the Single Audit Act and OMB Circular 2 CFR 200. All non-Federal entities that expend \$750,000 or more of Federal awards in a year are required to obtain an annual audit in accordance with the 2 CFR 200.501 *Audit Requirement* and the OMB Circular Compliance Supplement and Government Auditing Standards. <http://harvester.census.gov/fac>
- b) Compliance with the Federal Procurement Management Review under the Federal Suspension and Debarment. [www.gsa.gov](http://www.gsa.gov) or <http://www.gsaig.gov/index.cfm/suspension-and-debarment-listed-by-state/>

## 4. GRANT AND PROJECT CHANGES

The recipient and subrecipients may not make any significant changes to a project without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. Any other minor changes to an approved grant must be fully documented in the recipient and subrecipient records.

4.1 Significant changes include a change of recipient and subrecipient, a change of project site, additions or deletions of the types of eligible activities approved for a project, a shift of more than 10 percent from one approved eligible activity to another, a reduction in the number units, and a change in the subpopulation served.

4.2 Minor changes or program revisions that require recipient approval before the recipient or subrecipient can implement the change include all budget changes, a shift in funded program activities, and any program change not referenced in item 4.1 of this policy.

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### 5. REMEDIAL ACTIONS AND SANCTIONS

The Collaborative Applicant will review the performance of each recipient in carrying out its responsibilities. This will occur through annual on-site monitoring visits, single or program-specific audits, and other financial audit reports, information generated by HUD financial and reporting systems (e.g. LOCCS and e-snaps), HMIS, the Annual Performance Report (APR) and, where applicable, relevant information pertaining to recipient and subrecipient performance gained from other sources, to include citizen comments, complaint determinations, and litigation.

For programs that fail to meet program requirements:

5.1 The Collaborative Applicant shall notify the recipient and subrecipient of the non-performance and/or non-compliance with CoC Program regulations, and/or citizen comments and complaints.

5.2 If the recipient determines that a subrecipient is not complying with a program requirement or its subrecipient agreement; the recipient must take action through the following process:

- a) The recipient will document the subrecipient non-compliance with the CoC Program regulations and develop corrective actions designed to prevent a continuation of the deficiency, to mitigate to the extent possible, its adverse effects, and to prevent its recurrence. This report will be submitted to the Collaborative Applicant.
- b) The subrecipient may appeal the monitoring finding and request a hearing before the CoC Board who will review program performance and compliance to the CoC Program regulations and present the proposed corrective actions and sanctions. The recipient and subrecipient will attend the meeting to support the development of a schedule with milestones necessary to implement the corrective actions. The outcome of this review will be a Management Plan that assigns responsibilities for carrying out the remedial actions and dates for evaluating activities.
- c) The CoC Board has final decision. The subrecipient may appeal further by contacting the Portland Field Office of the U.S. Housing & Urban Development (HUD).

### 6. ON-SITE MONITORING

Annually, the Collaborative Applicant will contact the CoC Program recipients and subrecipients to schedule an on-site monitoring visit and confirm the monitoring visit in a written letter (refer to Appendix A) which will include a copy of the CoC Program Monitoring Checklist (refer to Appendix B) and the Program-specific Audit Compliance Review Form for non-Federal agencies expending \$750,000 or more in Federal funds in a fiscal year (refer to Appendix C).

6.1 On-site monitoring visits will be coordinated, when possible, for programs that receive both CoC Program and Emergency Solution Grant (ESG) funds. The Washington County Department of Housing Services, recipient of CoC Program funds, and the Washington County Office of Community Development, recipient of ESG funds, will coordinate with the subrecipient to accomplish monitoring on behalf of both federal funds during one on-site monitoring visit.

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When monitoring is coordinated by Washington County Department of Housing Services and Office of Community Development, the monitors will observe the independently funded programs according to applicable CoC Program and ESG federal regulations.

6.2 Within 45 calendar days of completing the on-site monitoring, the Collaborative Applicant will prepare a written letter summarizing the PASS/FAIL monitoring compliance notification, and any findings or audit concerns.

6.3 The subrecipient will have 30 calendar days to provide written response to the on-site monitoring compliance notification letter.

## 7. APPENDICES

Appendix A: Notice of CoC Program On-site Monitoring Visit

Appendix B: CoC Program Monitoring Tools – Parts I and II

Appendix C: Audit Compliance Review Form (2 CFR 200.501)

Appendix D: Annual Income Review, Policy and Procedure for Rent Subsidy Administered by Washington County Department of Housing Services/Housing Authority

## 8. REVISION HISTORY

Version/Date	Description of Changes
V0.2005	Original Version
V1.May 4, 2016	Revision: Add Appendix D
V2.May 5, 2017	Revision: Appendix D revised Section 3.c to clarify definitions in YARDI report and add to convert YARDI information to HMIS information; e.g. Client ID and Program Entry.
V3.April 30, 2018	Revision: Add HMIS Data Quality Plan to General Recordkeeping Checklist
V4.February 24, 2020	Revision: Add the Shelter Plus Care monitoring tool and information.

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**APPENDIX A: Notice of CoC Program On-Site Monitoring Visit**

<<Date>>

<Contact Name, Title>  
<Agency Name>  
<Address>  
<City, State Zipcode>

Re: Continuum of Care (CoC) Program On-Site Monitoring  
Project Name: \_\_\_\_\_  
HUD Project #: \_\_\_\_\_  
Grant Term: \_\_\_\_\_ to \_\_\_\_\_

Dear <Contact Name>:

The Washington County Department of Housing Services will be conducting annual visits to perform on-site monitoring of programs funded under the CoC Program, a McKinney-Vento Act homeless assistance program as defined in 24 CFR Part 578.

The on-site monitoring is scheduled on:  
Date/Time  
Location

In preparation for this visit, please assign a staff member as the point of contact who will have access to the program files. Enclosed is a copy of the CoC Program Monitoring Checklist that will be completed during the monitoring visit.

Prior to the monitoring visit, please compose a letter from your agency certifying that federal funding either DID or DID NOT trigger the Single or Program-specific Audit requirements under 2 CFR Part 200.501. This letter should be signed by your Chief Financial Officer or your Executive Director, and be submitted during the on-site monitoring visit. Please have available for review a copy of your most recent financial audit.

I look forward to working with you to ensure compliance to the federal standards for the CoC Program serving homeless individuals and families in Washington County. If you have questions regarding the on-site monitoring, please contact me at 503-846-4760 or email at [Annette\\_Evans@co.washington.or.us](mailto:Annette_Evans@co.washington.or.us).

Sincerely,

Annette M. Evans  
Homeless Program Manager  
OR-506CoC Collaborative Applicant Lead

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**APPENDIX B: CoC Program Monitoring Tools**

**PART I: Non-SPC**

Project Title: \_\_\_\_\_

Monitoring Date: \_\_\_\_\_

Performed by: Phyllis Bittinger \_\_\_\_\_

CoC Program Specialist \_\_\_\_\_

OR-506CoC Collaborative Applicant - Washington County Department of  
Housing Services \_\_\_\_\_

503-846-4757 Phyllis\_Bittinger@co.washington.or.us \_\_\_\_\_

Monitoring of CoC Program project of:

Recipient Agency

Subrecipient Agency

Agency Point of Contact: \_\_\_\_\_

Contact Information: \_\_\_\_\_

Agency Alternate: \_\_\_\_\_

Contact Information: \_\_\_\_\_

Agency: \_\_\_\_\_

Agency Phone: \_\_\_\_\_



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GENERAL RECORDKEEPING	YES	NO	N/A	COMMENTS
A. Are all records regarding the project (outside of financial records) centrally located?				
B. Do these records contain:				
1. CoC Program Grant Agreement with Federal Register HEARTH Act Rules				
2. Grant Agreement Amendments and Budget Revisions				
3. Notice To Proceed letter by Washington County				
4. Certificate of Liability Insurance				
5. Declaration of Restrictive Covenant, Trust Deed and Promissory Note (Acquisition, Construction & Rehab only)				
6. General correspondence relating to project				
C. Did the recipient accrue any costs to the CoC Program grant prior to receiving the Notice To Proceed?				
D. Does the agency subcontract for any services under the CoC Program?				
1. Is the approval to subcontract on file?				
2. Are Grant Agreement requirements passed along to subrecipients/subcontractors?				
E. The agency have a record retention policy compliant with 24 CFR Part 578.103(17). [CoC program records 5 years and acquisition/construction/rehab 15 years]				
F. Are homeless or formerly homeless persons participating on board of directors or other equivalent policy-making entity of the recipient or subrecipient? (24 CFR 578.75(g))				
G. The agency Affirmatively Furthers Fair Housing as documented by their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in 24 CFR 578.93(c) and Equal Access in Accordance With an Individual's Gender Identity 24 CFR 5.				
H. In addition to meeting the specific confidentiality and security requirements for HMIS data, does the agency have a policy on client confidentiality or a filing system to safeguard client confidentiality? [24 CFR 578.103(b)]				
I. Is HMIS Privacy Posting displayed? Can agency staff provide a copy of the <i>Privacy Notice to Consumers of Services</i> ?				
J. Does the agency have an HMIS Data Quality Plan?				
K. Does the agency retain documentation of compliance with the Housing Standards in 24 CFR 578.75(b), including inspection reports.				
L. Does the agency retain documentation of compliance with the faith-based activities requirements under 24 CFR 578.87(b)?				
M. Does the agency retain documentation of compliance with the Transparency Act Reporting under the Office of Management and Budget (OMB) Circulars 24 CFR Part 84 and 85 Administrative Requirements for Grants and Agreements, Circular 200 Single or Program-specific Audit for non-Federal agency expensing \$750,000 or more in Federal funds during the fiscal year, and other federal requirements in compliance with 24 CFR 578.99?				
N. The agency retains documentation of compliance with Lead-based Paint Poisoning Prevention Act 42.U.S.C. 4821-4846.				

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FINANCIAL RECORDS	YES	NO	N/A	COMMENTS
A. Are all project financial records centrally located?				
B. Does the agency financial management system provide evidence that there are controls in place to account for all funds, property, and other assets?				
C. Does the agency financial system have separate account numbers for each project activity? Does the separate account number identify project costs on line item basis?				
D. Does the agency compare budgeted line item costs against incurred costs in order to identify over/under spending on a line item basis so that adjustments can be made in a timely fashion?				
E. Are expenditures supported by timesheets, invoices, contracts, purchase orders, etc? <i>Note: Timesheets must be signed by the employee and his/her supervisor.</i>				
F. Are direct salaries and wages of employees that are chargeable to a particular grant program or more than one grant program supported by time distribution records?				
G. Does the agency provide no less than 25% (monthly) in funds or in-kind contributions from other sources as match for HUD-funded grant funds, except for leasing? (24 CFR Part 578.73)				
H. Before grant execution, did the agency provide a third party documentation (e.g. MOU) between the agency and the third party that will provide the services? (24 CFR 578.73(c)(3)) <i>Note: Agency will provide for inspection the records documenting the service hours provided.</i>				
I. Does the agency prepare and submit monthly, or at a minimum quarterly(24 CFR Part 578.85(c)(3)), reimbursement reports?				
J. Does agency understand that project records need to be retained for a minimum of five (5) years after close-out of the grant or clearance of any audit findings, and 15 years after close-out of a grant that funds acquisition, construction or rehabilitation activities?				
K. Has the agency been audited by independent auditors? If yes, were there any findings that the recipient is required to resolve? <i>Note: Obtain a copy of the agency's most recently completed audit.</i>				
L. Is the agency currently registered with System for Award Management?				
M. Has any program income been generated through any CoC Program-funded activities? (24 CFR Part 578.103(a)(6))				
N. If program income has been generated, has the agency reported the income generated through the use of the CoC Program funds?				
O. If program income has been generated, has the program income been disbursed only for eligible CoC Program activities?				
P. Has the agency expended program income to pay program costs prior to making further HUD-fund cash withdrawals?				
Q. Is the agency in compliance with 2 CFR 200 UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS, which outlines the project costs that are and are not eligible for payment with federal funds; and 24 CFR Part 84, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations?				

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Program Participant HMIS Unique ID #: \_\_\_\_\_

*Complete this checklist for each Program Participant file audited. Scope is 25% annual program participant case files will be randomly selected for review. This may include case files closed in the past 12 months.*

PROGRAM PARTICIPANT FILE RECORDKEEPING	YES	NO	N/A	COMMENTS
A. Are all records regarding the program participant centrally located?				
B. Do these records contain:				
1. Documentation that program participant has been screened via centralized assessment system and determined eligible for CoC Program assistance				
2. Documentation for verification of homeless status				
3. Are program participants coming from the target population identified in the grant application; e.g. mental illness, etc.?				
4. Does the file include verification of the participant's disability? [For Permanent Supportive Housing]				
5. Documentation for all sources of income				
6. Summary of steps taken to verify that the participant does not receive other subsidies for rent, utilities, etc.				
7. Documentation of search in HMIS for duplicative services AND prior rental/utility assistance to ensure maximum number of payments are not exceeded.				
8. Does the file contain documentation of total adjusted income and rent calculation? Annual re-certification?				
9. Evidence that Race and Ethnicity data is tracked according to federal reporting requirements.				
10. Documentation supporting that CoC Program assistance has ended, that the household is no longer in need of services, and household has been exited out of HMIS.				
11. Documentation for termination if the participant has been terminated from the program.				
C. Documentation that the case manager has met with the household at least monthly during their program enrollment period to develop individual service plan. Do these records include:				
1. Program intake/eligibility documentation; e.g. participant application, executed release of information forms, etc.				
2. Identification; e.g. government issued proof of citizenship: birth certificate, social security card, driver license, passport				
3. HMIS Consent to Release Information Form signed by both client and staff				
4. Is there a completed HMIS Entry/Exit form in the file? Is exiting data completed if the case is closed?				
5. Evidence of referrals to mainstream resources, etc.				
6. Copy of household budget and budget goals				
7. Are the most recent income FMR and Rent Reasonableness guidelines being used?				
8. For transitional housing, do the entry-exit dates exceed the 24-month limitation of stay? Does the file explain the need?				
9. Completed Housing Quality Standards (HQS) Inspection (24 CFR 578.75(b)) <i>Note: Initial HQS inspection plus annual inspections.</i>				<i>CoC Program rent assistance requires HQS inspection; this is performed and documented by the Housing Authority of Washington County</i>

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*This section will monitor the performance outcomes and deficiencies of the HUD-funded project using the most recent Annual Performance Report (APR) submitted to HUD.*

*The review will occur during the on-site monitoring visit between the Collaborative Applicant and the Agency Program Manager or his/her designee.*

Annual Performance Report grant period: \_\_\_/\_\_\_/\_\_\_\_\_ to \_\_\_/\_\_\_/\_\_\_\_\_

PROGRAM PERFORMANCE	YES	NO	N/A	COMMENTS
A. Did the agency and recipient complete and submit documentation in support of the Annual Performance Report (APR) within 90-days following the grant term? If not, why?				
B. Is the number of participants being served consistent with the number of participants targeted in the grant application? 1. If not, explain				
C. How many participants moved to permanent housing during a 12-month period? Does this meet the goal established in the grant application? 1. If not, what actions are being taken to improve this outcome?				
D. How many adult participants improved their earned income through employment by program exit? Does this meet the goal established in the grant application? 1. If not, what actions are being taken to improve this outcome?				
E. How many adult participants improved their non-cash income through mainstream resources? Does this meet the goal established in the grant application? 1. If not, what actions are being taken to connect participants to mainstream resources?				
F. Do participants exit the program with greater self-determination and stable housing? 1. If not, what programmatic changes or resources would improve the self-determination and self-sufficiency of program participants?				
Comments:				

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**PART II: SPC**

Performed by: Phyllis Bittinger  
\_\_\_\_\_  
CoC Program Specialist  
\_\_\_\_\_  
Washington County Department of Housing Services  
\_\_\_\_\_  
503-846-4757 Phyllis\_Bittinger@co.washington.or.us  
\_\_\_\_\_

Monitoring of CoC Program project of:

- Recipient Agency
- Subrecipient Agency

Agency Point of Contact: \_\_\_\_\_  
Contact Information: \_\_\_\_\_  
Agency Alternate: \_\_\_\_\_  
Contact Information: \_\_\_\_\_  
Agency: \_\_\_\_\_  
Agency Phone: \_\_\_\_\_

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GENERAL RECORDKEEPING	YES	NO	N/A	COMMENTS
A. Are all records regarding the project (outside of financial records) centrally located?				
B. Do these records contain:				
1. CoC Program Grant Agreement with Federal Register HEARTH Act Rules			X	
2. Grant Agreement Amendments and Budget Revisions			X	
3. Notice To Proceed letter by Washington County			X	
4. Certificate of Liability Insurance			X	
5. Declaration of Restrictive Covenant, Trust Deed and Promissory Note (Acquisition, Construction & Rehab only)			X	
6. General correspondence relating to project			X	
C. Did the recipient accrue any costs to the CoC Program grant prior to receiving the Notice To Proceed?			X	
D. Does the agency subcontract for any services under the CoC Program?			X	
1. Is the approval to subcontract on file?			X	
2. Are Grant Agreement requirements passed along to subrecipients/subcontractors?			X	
E. The agency have a record retention policy compliant with 24 CFR Part 578.103(17). [CoC program records 5 years and acquisition/construction/rehab 15 years]				
F. Are homeless or formerly homeless persons participating on board of directors or other equivalent policy-making entity of the recipient or subrecipient? (24 CFR 578.75(g))				
G. The agency Affirmatively Furthers Fair Housing as documented by their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in 24 CFR 578.93(c) and Equal Access in Accordance With an Individual's Gender Identity 24 CFR 5.				
H. In addition to meeting the specific confidentiality and security requirements for HMIS data, does the agency have a policy on client confidentiality or a filing system to safeguard client confidentiality? [24 CFR 578.103(b)]				
I. Is HMIS Privacy Posting displayed? Can agency staff provide a copy of the <i>Privacy Notice to Consumers of Services</i> ?				
J. Does the agency have an HMIS Data Quality Plan?				
K. Does the agency retain documentation of compliance with the Housing Standards in 24 CFR 578.75(b), including inspection reports.			X	
L. Does the agency retain documentation of compliance with the faith-based activities requirements under 24 CFR 578.87(b)?				
M. Does the agency retain documentation of compliance with the Transparency Act Reporting under the Office of Management and Budget (OMB) Circulars 24 CFR Part 84 and 85 Administrative Requirements for Grants and Agreements, Circular 200 Single or Program-specific Audit for non-Federal agency expensing \$750,000 or more in Federal funds during the fiscal year, and other federal requirements in compliance with 24 CFR 578.99?			X	
N. The agency retains documentation of compliance with Lead-based Paint Poisoning Prevention Act 42.U.S.C. 4821-4846.			X	

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FINANCIAL RECORDS	YES	NO	N/A	COMMENTS
A. Are all project financial records centrally located?				
B. Does the agency financial management system provide evidence that there are controls in place to account for all funds, property, and other assets?			X	
C. Does the agency financial system have separate account numbers for each project activity? Does the separate account number identify project costs on line item basis?			X	
D. Does the agency compare budgeted line item costs against incurred costs in order to identify over/under spending on a line item basis so that adjustments can be made in a timely fashion?			X	
E. Are expenditures supported by timesheets, invoices, contracts, purchase orders, etc? <i>Note: Timesheets must be signed by the employee and his/her supervisor.</i>			X	
F. Are direct salaries and wages of employees that are chargeable to a particular grant program or more than one grant program supported by time distribution records?			X	
G. Does the agency provide no less than 25% (monthly) in funds or in-kind contributions from other sources as match for HUD-funded grant funds, except for leasing? (24 CFR Part 578.73)				
H. Before grant execution, did the agency provide a third party documentation (e.g. MOU) between the agency and the third party that will provide the services? (24 CFR 578.73(c)(3)) <i>Note: Agency will provide for inspection the records documenting the service hours provided.</i>			X	
I. Does the agency prepare and submit monthly, or at a minimum quarterly(24 CFR Part 578.85(c)(3)), reimbursement reports?			X	
J. Does agency understand that project records need to be retained for a minimum of five (5) years after close-out of the grant or clearance of any audit findings, and 15 years after close-out of a grant that funds acquisition, construction or rehabilitation activities?				
K. Has the agency been audited by independent auditors? If yes, were there any findings that the recipient is required to resolve? <i>Note: Obtain a copy of the agency's most recently completed audit.</i>			X	
L. Is the agency currently registered with System for Award Management?			X	
M. Has any program income been generated through any CoC Program-funded activities? (24 CFR Part 578.103(a)(6))			X	
N. If program income has been generated, has the agency reported the income generated through the use of the CoC Program funds?			X	
O. If program income has been generated, has the program income been disbursed only for eligible CoC Program activities?			X	
P. Has the agency expended program income to pay program costs prior to making further HUD-fund cash withdrawals?			X	

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***Program Eligibility***

<b>DOCUMENTATION</b>	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
Homeless Eligibility			
Chronic Homeless Eligibility			
Disability			
Serious Mental Illness			
Chronic Substance Abuse			
AIDS/Related Diseases			
Developmental Disability			
Physical Disability			
Community Connect Assessment (program entry after 7/1/2014)			

***Supportive Services***

<b>DOCUMENTATION</b>	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
Case Management			
Mental Health Services			
Addiction Treatment			
AIDS-related Services			
Dental and Health Care			
Health Insurance			
Life Skills Training			
Budgeting Education			
Education (GED/Other)			
Employment			
Mainstream Benefits			
Housing Search Assistance			
Services Plan and Progress Recorded			

***Housing Assistance***

<b>DOCUMENTATION</b>	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
Application To Program			
Documentation of Match Services			

***General Recordkeeping and Administration***

<b>DOCUMENTATION</b>	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
Record Retention Policy			
Security/Privacy of Records			
HMIS Privacy and Consent			
Affirmatively Furthering Fair Housing			
Executed Memorandum of Understanding (MOU) On File			



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*This section will monitor the performance outcomes and deficiencies of the HUD-funded project using the most recent Annual Performance Report (APR) submitted to HUD.*

*The review will occur during the on-site monitoring visit between the Collaborative Applicant and the Agency Program Manager or his/her designee.*

Annual Performance Report grant period: \_\_\_/\_\_\_/\_\_\_ to \_\_\_/\_\_\_/\_\_\_

PROGRAM PERFORMANCE	YES	NO	N/A	COMMENTS
A. Did the agency and recipient complete and submit documentation in support of the Annual Performance Report (APR) within 90-days following the grant term? If not, why?				
B. Is the number of participants being served consistent with the number of participants targeted in the grant application?			X	
1. If not, explain			X	
C. How many participants moved to permanent housing during a 12-month period? Does this meet the goal established in the grant application?				
1. If not, what actions are being taken to improve this outcome?				
D. How many adult participants improved their earned income through employment by program exit? Does this meet the goal established in the grant application?				
1. If not, what actions are being taken to improve this outcome?				
E. How many adult participants improved their non-cash income through mainstream resources? Does this meet the goal established in the grant application?				
1. If not, what actions are being taken to connect participants to mainstream resources?				
F. Do participants exit the program with greater self-determination and stable housing?				
1. If not, what programmatic changes or resources would improve the self-determination and self-sufficiency of program participants?				
Comments:				

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**APPENDIX C: Audit Compliance Review Form**

*Internal document for review of the 2 CFR 200 Audit document provided by CoC Program funded agency (Project Sponsor)*

Agency Name: \_\_\_\_\_  
Audit Year End: \_\_\_\_\_  
Next Audit Due: \_\_\_\_\_  
Most Recent Audit Received: \_\_\_\_\_

Date entered into Federal Audit Clearinghouse (FAC) Database: \_\_\_\_\_

Program Findings:

No \_\_\_\_\_  
Yes \_\_\_\_\_

If Yes, provide detail below:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

If findings or concerns are evident, provide follow-up action taken with the agency.

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

Reviewed by: \_\_\_\_\_

Date Reviewed: \_\_\_\_\_

FAC: <https://harvester.census.gov/facweb/>

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**APPENDIX D: Annual Income Review**

**POLICY AND PROCEDURE FOR CoC PROGRAM PARTICIPANTS  
RECEIVING RENT ASSISTANCE ADMINISTERED BY WASHINGTON COUNTY**

Effective: May 5, 2017

CoC Policy: 578.103-OR506CoC <http://www.co.washington.or.us/Housing/EndHomelessness/hssn.cfm>

**SUMMARY**

Continuums of Care (CoC) must establish and maintain standard operating procedures for ensuring the CoC Program funds are used in accordance with the requirement established in 24 CFR Part 578. The rapid rehousing and permanent supportive housing assistance administered under the CoC Program is a collaboration between Washington County Department of Housing Services (Washington County) and Service Provider Agencies (Provider Agency), the nonprofit and public organization working directly with homeless program participations through case management and client-centered services.

This document seeks to address the standard operating procedure for preparing, documenting and data entry of income review for program participants receiving housing assistance administered by Washington County Department of Housing Services.

**POLICY**

*Annual Income* – Perform initial, and at least annually thereafter, a review of income for people receiving housing assistance where rent or occupancy charge is paid by the program participant. The annual income review will be performed in compliance with 24 CFR Parts 578.77 Calculating Occupancy Charges and Rent and 578.103(a)(6) Annual Income, and will be entered in HMIS using the anniversary of the participant program entry date in HMIS regardless of the date when the actual income review was completed as long as this review was no sooner than 30 days prior to the anniversary date and no later than 30 days following the anniversary date. The supporting income documentation will be retained in the participant rent assistance case file.

Provider Agency case workers will perform Interim Income Reviews in HMIS each time a program participant's income increase/decrease.

**PROCEDURE**

1. Washington County will develop an Annual Income Review schedule for all CoC Program participants receiving rent subsidy.
2. 120 days prior to the housing placement anniversary date for entry into housing as determined by rent assistance payments, the county's Occupancy Specialist will mail a Declaration Packet to the program participant to obtain source documents (e.g. most recent wage statement, unemployment compensation statement, public benefits statement, bank statement, etc.). The packet identifies the timeline for returning the packet with participant signature in support of the Annual Income Review.
3. Prior to the participant housing placement anniversary date:

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- a. The Occupancy Specialist will complete the income review under 24 CFR Part 578.77. Income for program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a) that includes evaluation of eligible income, calculate rent fees, and notify the participant and housing manager of changes in rent payment.
- b. Occupancy Specialist will prepare a YARDI report entitled “HMIS Information Sheet” whenever a household change occurs to include moving units, adding/deleting family members, increased income, etc., and deliver YARDI to the CoC Program Specialist.
- c. CoC Program will update the “HMIS Information Sheet” and upload into HMIS under the Client Profile tab. A separate email will be sent to the Provider Agency HMIS Administrator with the following updates:
  - i. Replace YARDI Client “T” number with the HMIS Client ID number;
  - ii. For Annual Income Review only - Replace the YARDI Effective Date with the HMIS Client Entry Date;
  - iii. Add details to describe the YARDI “Other Non-Wage” category that may include gifts from family/friends; student loan income, etc.; and
  - iv. Add details to describe the YARDI “Social Security” category to reflect either SSDI and/or Retirement, or Dependent benefits. Note: Dependent benefits occur when eligible person lives in household with retired parent(s) and/or disabled/deceased parent(s).

For the remaining YARDI Income Categories, please note the following and enter into HMIS appropriately:

- v. The YARDI “Other Wage” is employment income;
  - vi. The YARDI “SSI” category is an adult or child that was determined disabled before age 22 and has not paid into the Social Security system.
4. Provider Agency HMIS Administrator will enter the information provided on the HMIS Information Sheet into HMIS within 5 business days in accordance with this policy. <http://www.co.washington.or.us/Housing/EndHomelessness/hmis.cfm>
    - a. For instructions on how to download the attachment in HMIS, see details in the HMIS Manual entitled *Attachments*.
    - b. For instructions on how to enter the annual income information, see details in the HMIS Manual entitled *Interim Reviews/HUD Verification*.

Provider Agency HMIS Administrator may be instructed to share this information with the appropriate agency case manager for the homeless program participant. This would be an internal agency policy at the discretion of the Provider Agency.

### 5. EXAMPLE DOCUMENTATION

YARDI is the software system for property management of homeless rent assistance programs. The following YARDI report is generated at the time of housing activities.

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<<Client Name>> - t0000000 - Property: 95L  
 1-New - Effective: <<Date>>

HMIS Information Sheet

**Household:**

First	Last	Gender	DOB	Rel	SSN	Dis?	W	B	AmI	As	PI	Hisp

Agency:	Veteran:	SPC Code:	DV:	Chronic:	Prior Living Situation:	Last Zip:
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ServicePoint ID#	Exit - Reason (if applicable)	Exit - Destination (if applicable)
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**Household Income:**

Member	Income Type	Annual Amount	Monthly Amount

**Comments/Other Info:**

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