

APPENDIX

HUD recommends that all recipient and subrecipient staff involved with the CoC program be provided a copy of this appendix.

CoC PROGRAM RESOURCES

- **CONTINUUM OF CARE (CoC) PROGRAM ON THE HUD EXCHANGE**
<https://www.hudexchange.info/programs/coc/>
- **CoC PROGRAM START UP TRAINING WEBINARS FOR THE FY 2013/2014 COMPETITION** <https://www.hudexchange.info/training-events/courses/coc-program-start-up-training-webinars-for-fy-2013-funds/>
- **CoC PROGRAM TOOLKIT** <https://www.hudexchange.info/programs/coc/toolkit/>
- **CoC PROGRAM GRANTS ADMINISTRATION USER GUIDE**
<https://www.hudexchange.info/resource/2946/coc-program-grants-administration-user-guide/>
- **CoC PROGRAM LAW, REGULATIONS, AND NOTICES**
<https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/>
- **JOIN THE HUD EXCHANGE MAILING LIST (CHOOSE ONLY THE PROGRAM(S) YOU WANT)** <https://www.hudexchange.info/maillinglist/>
- **CPD MONITORING HANDBOOK**
http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2 **(CoC PROGRAM EXHIBITS ARE FOUND IN CHAPTER 29.)**

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U.S. Department of HUD, CoC Program

ELIGIBLE COSTS FOR THE CoC PROGRAM

- Overview of CoC Program Components and Eligible Costs
<https://www.hudexchange.info/trainings/courses/overview-of-coc-program-components-and-eligible-costs/>
- 24 CFR 578 Supportive Services details eligible costs for this budget line item. Please note that 24 CFR 578.53(d) states that any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using CoC program funds.
- 24 CFR 578.55 Operating Costs details eligible and ineligible costs for this budget line item.
- 24 CFR 578.59 Project Administration Costs details eligible costs for this budget line item.

Eligible costs for CoC can be found at 24 CFR 578, Subpart D, Sections .37 through .63.

Program Components and Eligible Costs (Subpart D): CoC funds may be used for projects under five program components: PH, TH, SS, HMIS, and, in some limited cases, homelessness prevention. The rule further clarifies how the following activities are considered eligible costs under the CoC program: CoC Planning activities, Unified Funding Agency costs, acquisition, rehabilitation, new construction, leasing rental assistance, supportive services, operating costs, HMIS, project administrative costs, relocation costs, and indirect costs.

Supportive Services (24 CFR 578.53)

Grant funds may be used to pay eligible costs of supportive services for the special needs of program participants. All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of DV, dating violence, sexual assault, or stalking. Any cost that is not described as an eligible cost under this interim rule is not an eligible cost of providing supportive services. Eligible costs consist of assistance with moving costs, case management, child care, education services, employment assistance and job training, housing search and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, and utility deposits.

The definition of “supportive services” in section 401(27) of the McKinney-Vento Act includes the provision of mental health services, trauma counseling, and victim services. HUD has determined that victim services are eligible as supportive services, and are included as eligible program costs of this interim rule. Providers are allowed to provide services specifically to victims of DV, dating violence, sexual assault, and stalking. The eligible costs for providing victim services are listed as eligible costs in the SS funding category. Rather than create a new eligible line item in the project budget, HUD has determined that these costs can be include in the funding categories already established.

Please note that items not specifically listed eligible in the regulations are ineligible. Please consult with your HUD representative, if in doubt regarding the eligibility of a SS item.

Other Costs

The regulations also address the following other eligible costs: acquisition, rehabilitation, new construction, operating costs, HMIJS, project administrative costs, and relocations costs.

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Please note that Occupancy Charges and rent collected from program participants are program income and may only be used as provided under 24 CFR 578.97 on eligible CoC program expenses. Program income is considered to be CoC funding.

CoC PROGRAM FUNDING ELIGIBLE COSTS (BY BUDGET LINE ITEM)

This spreadsheet details costs eligible for reimbursement with Continuum of Care (CoC) Program Funding. Eligible costs are determined using the CoC Program Interim Rule. Backup documentation is required for all costs charged to CoC program funds. This sheet may be updated as additional clarification is received about specific costs and upon the issuance of the CoC Program Final Rule.

CoC program funds may be used to pay indirect costs in accordance with 24 CFR 200, as applicable. Indirect costs may be allocated to each budget line item noted below, in accordance with cost eligibility guidelines, so long as that allocation is consistent with an indirect cost rate proposal developed and approved in accordance with OMB Circulars A-87 or A-122, or 24 CFR 200, as applicable.

Only the eligible costs submitted on the CoC application budget and /or amendment request are allowable. If an eligible cost was not included when the budget and/or amendment was submitted, a request to include the cost must be submitted to CSB per the local HUD field office.

BUDGET LINE ITEM	TYPE OF COST	ELIGIBLE & INELIGIBLE COSTS	ADDITIONAL INFORMATION
Leasing	N/A	100% of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services to homeless persons are eligible for up to 3 years. The cost of headquarters and lead-based paint inspections are allowable.	Rent must be reasonable in relation to other comparable units in the area. Documentation of rent reasonableness must be in the client file. Rent may not exceed HUD FMR rates. Rent must be paid to the landlord and not the client. The lease must be in the name of the subgrantee. All subgrantees must also have signed occupancy agreements or leases (or subleases) with program participants residing in housing.
		Security deposits in an amount not to exceed two months of actual rent are eligible. An advance payment of the last month's rent is eligible if it accompanies a security deposit and first month's rent.	Multiple security deposits for the same client are allowable when a household must be relocated to a different unit (e.g., if FMR and/or rent reasonableness changes or if household composition changes). Any refund of the initial deposit must be returned to the agency, shown on the invoice disbursements journal as 'Program Income - Deposit Refund,' and reported on the CoC Annual Performance Report as Program Income.
		If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds.	

		Funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception.	Program income, including any rent and occupancy charges collected from program participants, may not be used as match.
		If client utilities are not provided by the landlord, these utility costs are an operating cost. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.	
		Rent above FMR is ineligible. Providers that own their property may not conduct HQS inspections.	
Rental Assistance	N/A	Funds may be used to provide rental assistance for homeless individuals and families. Rental assistance may be short-term, medium-term, or long-term. Rental assistance may be tenant-based, project-based, or sponsor-based. The cost of HQS and lead-based paint inspections are allowable.	Rent must be reasonable in relation to other comparable units in the area. Documentation of rent reasonableness must be in the client file. Rent may exceed HUD FMR rates but must be reasonable in comparison to other units in the area. Rent must be paid to the landlord and not the client. There is no provision in the CoC Program Interim Rule that allows for utility payments using rental assistance dollars. HUD has indicated that they will issue a reallocation that will permit such payments. The local field office is currently allowing utility costs to be paid with rental assistance funds.
		Security deposits in an amount not to exceed two months of actual rent are eligible. An advance payment of the last month's rent is eligible if it accompanies a security deposit and first month's rent.	
		Funds may be used, in an amount not to exceed one month's rent, to pay for any damage to housing due to the action of a program participant. Damage costs may only be accrued once per participant, and are incurred at the time a participant exits a housing unit.	

		If a unit assisted under this section is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.	
		For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. Leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.	
		Funds cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, state, or local sources.	Program income, including any rent and occupancy charges collected from program participants, cannot be used as match.
		The costs to repair unit damages are not allowable.	Repair and maintenance are only eligible under operating costs. Operating costs are unallowable in the same program as rental assistance.
		Providers that own their property may not conduct HQS inspections.	
Supportive Services			
	Subcontracted supportive services are allowable, but MUST be documented through a detailed contract that ensures full compliance with CoC Program cost eligibility requirements, including the assurance that the contract/MOA and its term represent an arm's length transaction. The subcontractee must invoice the CoC-funded agency for costs in accordance with the contract/MOA. Compliant procurement procedures must also be followed and detailed in full.		
	Annual Assessment of Service Needs	The costs of providing annual assessments of the service needs of program participants are eligible.	
	Assistance with Moving Costs	Reasonable one-time moving costs are eligible, including truck rental and hiring a moving company.	Moving costs are only allowable under supportive services.
	Case Management	The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants are eligible. These may include:	
		Counseling;	

		Developing, securing, and coordinating services;	Program supervisor staff costs are considered eligible.
		Using the centralized or coordinated assessment system;	The Coordinated Point of Access is operated by HandsOn Central Ohio in Columbus and Franklin County.
		Obtaining federal, state, and local benefits;	
		Monitoring and evaluating program participant progress;	
		Providing information and referrals to other service providers;	
		Providing ongoing risk assessment and safety planning with victims of domestic violence; and	
		Developing an individualized housing and service plan, including housing stabilization.	Referred to as the Individualized Housing Stabilization Plan, or IHSP, in CSB materials.
	Child Care	The costs of establishing and operating child care, and providing child-care vouchers, for children experiencing homelessness are eligible. Children must be under the age of 13 unless they are disabled. Disabled children must be under the age of 18.	
		The child care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.	
		Eligible costs include the costs of providing meals/snacks and developmental activities.	
	Education Services	The costs of improving knowledge and basic educational skills are eligible. These may include instruction or training in consumer education, health education, substance abuse prevention, literacy, ESL & GED classes.	
		Component services and activities are screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.	

	Employment Assistance and Job Training	The costs of establishing and operating employment assistance and job training programs are eligible. These may include classroom, online and/or computer instruction, on-the-job instruction, and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.	
		Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.	
		The cost of providing reasonable stipends to participants in these employment programs is also eligible.	
		Services that assist individuals in securing employment consist of the following:	
		Employment screening, assessment, or testing;	
		Structured job skills and job-seeking skills;	
		Special training and tutoring, including literacy training and pre-vocational training;	
		Books and instructional material;	
		Counseling and job coaching; and	
		Referral to community resources.	
	Food	The cost of providing meals or groceries to program participants is eligible. ONLY eligible if food has been included in the budget detail submitted with the application or an amendment.	
	Housing Search and Counseling Services	The costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.	
		Component services and activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.	
		Other eligible costs include the following:	
		Mediation with property owners and landlords on behalf of eligible program participants;	Funds may not be used to pay for eviction costs.
		Credit counseling, accessing a free credit report, and resolving personal credit issues; and	

		The payment of rental application fees.	Background checks are considered an eligible cost if included as part of a rental application fee or as a program eligibility requirement.
	Legal Services	Eligible costs are 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 the homeless individual or family's ability to obtain and retain housing.	
		Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants. Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.	
		Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.	
		Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.	
	Life Skills Training	The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community.	

		Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.	
	Mental Health Services	Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals.	
		Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.	
	Outpatient Health Services	Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:	
		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; and	
		Preventive and non-cosmetic dental care.	
	Outreach Services	The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.	
		Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.	

		Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.	
	Substance Abuse Treatment Services	The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible.	
		Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible. Training costs are unallowable. Any costs that are not included in the budget detail submitted with the application.	
	Transportation	Eligible costs include the following:	
		The 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 services eligible under this section;	Transportation for clients must be logged and verifiable according to the stipulations noted here. Agencies should develop a policy to ensure that client transportation costs are being appropriately allocated and tracked.
		Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;	
		The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;	
		The cost of gas, insurance, taxes, and maintenance for the vehicle;	
		The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and	
		If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle.	This cost is subject to additional regulation, but public transportation availability in Columbus and Franklin County make this an ineligible expense.
	Utility Deposits	Utility deposits are an eligible cost as a one-time fee, paid to utility companies.	

	Direct Provision of Services	If the service described in this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:	
		The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and	Community meeting expenses directly related to services provided are also considered eligible costs.
		The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.	Work-related telephone, cell phone, and internet services for staff members are considered eligible costs.

ADDITIONAL COST ELIGIBILITY INFORMATION

Telephone and cellular phone services for clients are ineligible.

Cable service is ineligible.

Internet service for individual client units is ineligible.

Late fees such as late fees charged for telephone, utilities, etc are unallowable.

Operating Costs	Subcontracted property management services are allowable, but MUST be documented through a detailed contract/MOA that ensures full compliance with CoC Program cost eligibility requirements, including the assurance that the contract/MOA and its term represent an arm's length transaction. The subcontractee must invoice the CoC-funded agency for costs in accordance with the contract/MOA. Compliant procurement procedures must also be followed and detailed in full.		
		Grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units. Eligible costs include:	
		The maintenance and repair of housing;	
		Property taxes and insurance;	
		Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);	
		Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;	
		Electricity, gas, and water; and	
		Furniture and equipment.	Furniture charged under operating costs should stay with the unit. Mattresses are eligible, as they are part of a bed, but given the unique nature of a mattress, participants are allowed to take mattresses with them when they leave the project.
		Client relocation costs are eligible for a period no longer than 365 days.	

		Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter and supportive service-only facilities.	
		Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.	Bed linens are an unallowable cost. Water for office consumption is an unallowable cost.
ADDITIONAL COST ELIGIBILITY INFORMATION			
Telephone and cellular phone services for clients are ineligible.			
Cable service is ineligible.			
Internet service for individual client units ineligible			
Late fees such as late fees charged for telephone, utilities, etc are unallowable.			
Project Administrative Costs	Indirect costs may be charged to the administrative BLI as noted above, but the indirect costs for this BLI must be calculated by applying the indirect cost rate only to costs eligible under the administrative BLI. An approved indirect cost rate can be applied to other BLIs in order to capture costs associated with those cost categories.		
		The recipient or subrecipient may use up to 10 percent of any grant awarded under this part for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under other cost categories, because those costs are eligible as part of those activities.	Administrative costs are currently capped at 7% by the local CoC.
	General Management, Oversight, and Coordination	Costs of 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.	All salary and wages must be documented by timesheets with hours worked on the project by each day. Timesheets must be approved by the employee and a supervisor.

		Travel costs incurred for monitoring of subrecipients;	
		Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and	
		Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.	
	Training on Continuum of Care Requirements	Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.	
	Environmental Review	Costs of carrying out the environmental review responsibilities under § 578.31.	
Program Income	<p>Program Income is income directly generated by the grant-supported activity. Include income where the costs incurred to generate that income are CoC (or match) costs. Do not include income where the costs incurred to generate that income are unallowable or not part of the program. Program Income documentation must follow CoC regulations for receipt and expenditure standards. Program Income cannot be used as Match. Program Income must be added to funds committed to the project and used for CoC-eligible activities.</p>		
	Occupancy fees	Occupancy fees paid by tenants to the Provider agency are Program Income.	<p>If the Provider agency pays the full rent amount to the landlord and then the tenant pays a portion of the rent to the Provider agency, the tenant portion of the rent is Program Income. If the Provider agency pays a portion of the rent to the landlord and the tenant pays a portion of the rent to the landlord, the tenant portion of the rent is not Program Income, even if the Provider agency and landlord are the same entity. Section 8 revenue is not Program Income.</p>

	Vending machine revenue	If a CoC-funded provider leases a building that already has vending machines and the provider is permitted to keep the vending machine revenue, include those receipts as Program Income. If a CoC-funded provider purchases or operates a residential facility, vending machines are not an eligible CoC expense; therefore, vending machine receipts are not considered Program Income whether collected by the recipient or vendor.	
	Laundry revenue	Include revenue from laundry machines.	
	Space rental	Include revenue from renting space, if the space rented is in a CoC-funded facility.	

Match Guidance

CoC Match – Best Practices and Resources

Best Practices:

- ✓ At the time of the initial or renewal application, make sure written match commitments are realistic and properly documented.
 - For cash match, the commitment should be provided on the agency's letterhead, be signed and dated by an authorized representative and include (1) the amount of cash to be provided; (2) the dates the cash will be available; (3) the project grant and fiscal year to which the cash is committed; and (4) the allowable activities that will be funded with the cash contribution.
 - For in kind match, services to be provided by a 3rd party must be documented by a Memorandum of Understanding (MOU) between the Recipient/Subrecipient and third party service provider(s). The MOU must (1) provide an unconditional commitment to provide the services; (2) describe the services to be provided (must be CoC-eligible activities); (3) indicate the profession of the persons providing the services and how the value of the service is determined (e.g based on salary or hourly rate); (4) specify the timeframe (dates) in which the services will be provided; and (4) describe how actual services delivered will be documented and valued.
 - For other in kind match, written documentation of the in kind contribution must be provided on the agency's letterhead, be signed and dated by an authorized representative, and include (1) the value of donated goods to be provided; (2) the date the goods will be made available; and (3) the project grant and fiscal year to which the in kind goods are committed; and (4) the CoC-eligible expenses that are supported.
- ✓ At the time of initial or renewal award, check to see if your award amount changed from the amount in your application. If there is an increase (e.g. budget increase due to FMR increases for your area), be sure to adjust match commitments accordingly.
- ✓ During the implementation of your grant, document match as your grant is expended.
 - For cash match, be sure you are tracking matching amounts as they are used to support CoC eligible activities. Maintain the same back-up documentation for match as used for direct draws on the grant. Ensure the expenses supported by contributed cash support CoC-eligible activities.

- For in kind match provided under a MOU, periodically assess and document the actual services provided throughout the implementation of the grant to ensure the value of matching resources are on track to meet match requirements. Ensure the expenses supported by contributed in kind resources support CoC-eligible activities.
- For other in kind match, periodically assess and document the actual goods made available throughout the implementation of the grant to ensure their value will meet the match requirements. Ensure the expenses supported by contributed in kind resources support CoC-eligible activities.
- ✓ Maintain records of match that include (1) the HUD CoC grant number and operating year dates for the project; (2) the initial (and updated, as applicable) match written commitments; (3) documentation of actual match provided throughout the grant's operating year; (4) a summary of actual match amounts and verification that all were for CoC-eligible expenses; and (5) the total match to be reported on the APR (based on the documentation of verified match).
- ✓ Accurately report your match on the Annual Performance Report (APR). The amount reported on the APR should be backed up by your records showing amounts of actual match for verified CoC-eligible expenses.

HUD Resources and Guidance:

HUD Exchange Resources:

CoC Program Grants Administration User Guide: <https://www.hudexchange.info/resource/2946/coc-program-grants-administration-user-guide/>

CoC FAQs – enter 'match' as a key word and you will see 11 FAQs providing guidance: <https://www.hudexchange.info/coc/faqs/>

Importance of Documenting Match Podcast: <https://www.hudexchange.info/programs/coc/coc-2-0-training-materials/podcasts/>.

Video: Match Requirements in the CoC Program: <https://www.hudexchange.info/programs/coc/coc-2-0-training-materials/videos/>

What are allowable sources of cash match in the CoC program?

<https://www.hudexchange.info/faqs/1557/what-are-allowable-sources-of-cash-match-in-the-coc-program/>

What are the match requirements in the CoC program?

<https://www.hudexchange.info/faqs/1552/what-are-the-match-requirements-in-the-coc-program/>

Information in CoC Start-up Training provided in 2014 for FY2013 awarded projects:

<https://www.hudexchange.info/trainings/courses/coc-program-start-up-training-webinars-for-fy-2013-funds1/>

CoC Match Requirements - excerpted statutes, regulations and HUD guidance

HEARTH Act:

“SEC. 430. MATCHING FUNDING.

“(a) IN GENERAL.—A collaborative applicant in a geographic area in which funds are awarded under this subtitle shall specify contributions from any source other than a grant awarded under this subtitle, including renewal funding of projects assisted under subtitles C, D, and F of this title as in effect before the effective date under section 1503 of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009, that shall be made available in the geographic area in an amount equal to not less than 25 percent of the funds provided to recipients in the geographic area, except that grants for leasing shall not be subject to any match requirement.

“(b) LIMITATIONS ON IN-KIND MATCH.—The cash value of services provided to the residents or clients of a project sponsor by an entity other than the project sponsor may count toward the contributions in subsection (a) only when documented by a memorandum of understanding between the project sponsor and the other entity that such services will be provided.

“(c) COUNTABLE ACTIVITIES.—The contributions required under subsection (a) may consist of—

“(1) funding for any eligible activity described under section 423; and

“(2) subject to subsection (b), in-kind provision of services of any eligible activity described under section 423.

CoC Regulation Excerpts (24 CFR 578):

§578.73 Matching requirements.

(a) *In general.* The recipient or subrecipient must match all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources. For Continuum of Care geographic areas in which there is more than one grant agreement, the 25 percent match must be provided on a grant-by-grant basis. Recipients that are UFAs or are the sole recipient for their Continuum, may provide match on a Continuum-wide basis. Cash match must be used for the costs of activities that are eligible under subpart D of this part, except that HPCs may use such match for the costs of activities that are eligible under §578.71.

(b) *Cash sources.* Notwithstanding 2 CFR 200.306(b)(5), a recipient or subrecipient may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match. The recipient must ensure that any funds used to satisfy the matching requirements of this section are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under this program.

(c) *In-kind contributions.* (1) The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under §578.71.

(2) The requirements of 2 CFR 200.306, with the exception of §200.306(b)(5) apply.

(3) Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(i) The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided.

(ii) During the term of the grant, the recipient or subrecipient must keep and make available, for inspection, records documenting the service hours provided.

§578.103 Recordkeeping requirements.

(a) *In general.* The recipient and its subrecipients must establish and maintain standard operating procedures for ensuring that Continuum of Care program funds are used in accordance with the requirements of this part and must establish and maintain sufficient records to enable HUD to determine whether the recipient and its subrecipients are meeting the requirements of this part, including:

.....
(11) *Match.* The recipient must keep records of the source and use of contributions made to satisfy the match requirement in §578.73. The records must indicate the grant and fiscal year for which each matching contribution is counted. The records must show how the value placed on third party in-kind contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

2 CFR 200

§200.306 Cost sharing or matching.

(a) Under Federal research proposals, voluntary committed cost sharing is not expected. It cannot be used as a factor during the merit review of applications or proposals, but may be considered if it is both in accordance with Federal awarding agency regulations and specified in a notice of funding opportunity. Criteria for considering voluntary committed cost sharing and any other program policy factors that may be used to determine who may receive a Federal award must be explicitly described in the notice of funding opportunity. See also §§200.414 Indirect (F&A) costs, 200.203 Notices of funding opportunities, and Appendix I to Part 200—Full Text of Notice of Funding Opportunity.

(b) For all Federal awards, any shared costs or matching funds and all contributions, including cash and third party in-kind contributions, must be accepted as part of the non-Federal entity's cost sharing or matching when such contributions meet all of the following criteria:

- (1) Are verifiable from the non-Federal entity's records;
- (2) Are not included as contributions for any other Federal award;
- (3) Are necessary and reasonable for accomplishment of project or program objectives;
- (4) Are allowable under Subpart E—Cost Principles of this part;
- (5) Are not paid by the Federal Government under another Federal award, except where the Federal statute

authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs; *[not applicable]*

- (6) Are provided for in the approved budget when required by the Federal awarding agency; and
- (7) Conform to other provisions of this part, as applicable.

(c) Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate.

(d) Values for non-Federal entity contributions of services and property must be established in accordance with the cost principles in Subpart E—Cost Principles. If a Federal awarding agency authorizes the non-Federal entity to donate buildings or land for construction/facilities acquisition projects or long-term use, the value of the donated property for cost sharing or matching must be the lesser of paragraphs (d)(1) or (2) of this section.

(1) The value of the remaining life of the property recorded in the non-Federal entity's accounting records at the time of donation.

(2) The current fair market value. However, when there is sufficient justification, the Federal awarding agency may approve the use of the current fair market value of the donated property, even if it exceeds the value described in (1) above at the time of donation.

(e) Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the non-Federal entity. In those instances in which the required skills are not found in the non-Federal entity, rates must be consistent with those paid for similar work in the labor market in which the non-Federal entity competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

(f) When a third-party organization furnishes the services of an employee, these services must be valued at the employee's regular rate of pay plus an amount of fringe benefits that is reasonable, necessary, allocable, and otherwise allowable, and indirect costs at either the third-party organization's approved federally negotiated indirect cost rate or, a rate in accordance with §200.414 Indirect (F&A) costs, paragraph (d), provided these services employ the same skill(s) for which the employee is normally paid. Where donated services are treated as indirect costs, indirect cost rates will separate the value of the donated services so that reimbursement for the donated services will not be made.

(g) Donated property from third parties may include such items as equipment, office supplies, laboratory supplies, or workshop and classroom supplies. Value assessed to donated property included in the cost sharing or matching share must not exceed the fair market value of the property at the time of the donation.

(h) The method used for determining cost sharing or matching for third-party-donated equipment, buildings and land for which title passes to the non-Federal entity may differ according to the purpose of the Federal award, if paragraph (h) (1) or (2) of this section applies.

(1) If the purpose of the Federal award is to assist the non-Federal entity in the acquisition of equipment, buildings or land, the aggregate value of the donated property may be claimed as cost sharing or matching.

(2) If the purpose of the Federal award is to support activities that require the use of equipment, buildings or land, normally only depreciation charges for equipment and buildings may be made. However, the fair market value of equipment or other capital assets and fair rental charges for land may be allowed, provided that the Federal awarding agency has approved the charges. See also §200.420 Considerations for selected items of cost.

(i) The value of donated property must be determined in accordance with the usual accounting policies of the non-Federal entity, with the following qualifications:

(1) The value of donated land and buildings must not exceed its fair market value at the time of donation to the non-Federal entity as established by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the non-Federal entity as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) (Uniform Act) except as provided in the implementing regulations at 49 CFR part 24.

(2) The value of donated equipment must not exceed the fair market value of equipment of the same age and condition at the time of donation.

(3) The value of donated space must not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

(4) The value of loaned equipment must not exceed its fair rental value.

(j) For third-party in-kind contributions, the fair market value of goods and services must be documented and to the extent feasible supported by the same methods used internally by the non-Federal entity.

(k) For IHEs, see also OMB memorandum M-01-06, dated January 5, 2001, Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs.

Match Requirement (from 2016 CoC Competition Operating Instructions):

Recipients awarded funds must match the total grant, including project administrative costs and CoC planning costs, with no less than 25 percent cash and/or in-kind contributions from other sources. The only exception to the match requirement is leasing costs, which does not require match. All recipients must adhere to 24 CFR 578.73 and 2 CFR 200.306. Match may only be used for the costs of eligible

activities. For renewal and new projects, the recipient must provide match documentation, as indicated below, before HUD signs the grant agreement.

Match documentation must:

- 1) clearly document a firm financial commitment;
- 2) be signed by a person with authority on the letterhead of the organization;
- 3) be conditioned only upon HUD approval of the grant;
- 4) have a current date, generally no more than 60 days prior to the date of the award announcement (an exception may be a contract that covers the correct grant period but was signed prior to 60 days before the award); and
- 5) include the amount of match being provided.

Section 578.97(c) provides that rents and occupancy charges collected by the recipient or subrecipient from program participants are program income, provided that the program income is retained by the recipient. The FY 2016 Appropriations Act permits grant recipients to use program income as match in FY 2015 and FY 2016. There is language to this effect in the grant agreement's Scope of Work Exhibit for FY 2016.

For in-kind match, there must also be a description of the in-kind match that clearly demonstrates that it will be used for the conditionally-awarded project.

a. Cash Match

(1) Recipients/subrecipients may use funds from any source, including any other Federal, state, local, and private sources, provided that the funds are not statutorily prohibited to be used as match. However, Recipients/ subrecipients are prohibited from using CoC Program funds as match.

(2) The recipient must demonstrate that any funds used as match are eligible to be used as match for the CoC Program. Each funding source has its own requirements governing whether it can be used to match Federal funding. The recipient is responsible for confirming that the source of match used is eligible as determined by the regulations and rules governing it.

b. In-kind Contributions

(1) Recipients/subrecipients using in-kind contributions may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipients/subrecipients would have to pay for them with grant funds, the costs would be eligible.

(2) During the term of the grant, the recipients/subrecipients must maintain and make available for inspection records documenting the value of real property, equipment, goods, or services.

(3) Recipients/subrecipients must adhere to the requirements of 2 CFR 200.306.

Recipients/subrecipients must execute a Memorandum of Understanding (MOU) with any third party that will provide services before grant execution in accordance with 24 CFR 578.73(c)(3). Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's/subrecipient's organization. If the recipient/subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market. It is the responsibility of the recipient to provide evidence of cost reasonableness.

(4) A MOU must establish unconditional commitment, except for selection to receive a grant, by the third party to provide the services, including the following:

(a) The specific service to be provided;

(b) The profession of the persons providing the service; and

(c) The hourly cost of the service to be provided.

(5) During the term of the grant, the recipient/subrecipient must maintain and make available for inspection records documenting the service hours provided.

Match Requirements

Recipients of new and renewal CoC grants must adhere to 24 CFR 578.73 and 2 CFR 200.30 and match may only be used for the costs of eligible activities. Recipients must match the total grant, except leasing, with no less than 25 percent cash or in-kind contributions from other sources.

Recipients of renewal grants record match information in *e-snaps* during the application process. For renewal grants that were not expanded, there is no need to provide further documentation prior to execution of the Scope of Work unless there was a condition attached to the grant.

Recipients of new grants and expanded renewal projects must provide match documentation for the total grant awarded, except Leasing, before HUD signs the grant agreement. Match documentation must:

- clearly document a firm financial commitment that covers the correct grant period;
- be signed by a person with authority on the letterhead of the organization;
- be conditioned only upon HUD approval of the grant;
- include the amount of match being provided.
- While recipients of new projects must demonstrate match for the total grant awarded prior to grant execution; for new and renewal projects, the actual match provided by the recipient over the course of the grant term is based on the amount of grant funds expended on eligible activities (i.e., what it draws down from LOCCS).

For in-kind match, there must also be a description of the in-kind match that clearly demonstrates that it will be used for the conditionally-awarded project.

a. Cash Match

- i. Recipients/subrecipients may use funds from any source, including any other Federal, state, local, and private sources, provided that the funds are not statutorily prohibited to be used as match. However, Recipients/ subrecipients are prohibited from using CoC Program funds as match.
- ii. The recipient must demonstrate that any funds used as match are eligible to be used as match for the CoC Program. Each funding source has its own requirements governing whether it can be used to match Federal funding. The recipient is responsible for confirming that the source of match used is eligible as determined by the regulations and rules governing it.

b. In-kind Contributions

- i. Recipients/subrecipients using in-kind contributions may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipients/subrecipients would have to pay for them with grant funds, the costs would be eligible.

- ii. During the term of the grant, the recipients/subrecipients must maintain and make available for inspection records documenting the value of real property, equipment, goods, or services.
- iii. Recipients/subrecipients must adhere to the requirements of 2 CFR 200.306. Recipients/subrecipients must execute a Memorandum of Understanding (MOU) with any third party that will provide services before grant execution in accordance with 24 CFR 578.73(c)(3). Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's/subrecipient's organization. If the recipient/subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market. It is the responsibility of the recipient to provide evidence of cost reasonableness.
- iv. For supportive services provided, an MOU must establish unconditional commitment, except for selection to receive a grant, by the third party to provide the services, including the following:
 - (a) the specific service to be provided;
 - (b) the profession of the persons providing the service; and
 - (c) the hourly cost of the service to be provided.
- v. During the term of the grant, the recipient/subrecipient must maintain and make available for inspection records documenting the service hours provided.

Internal Wellness Checklist

**CONTINUUM OF CARE (CoC) PROGRAM
INTERNAL WELLNESS “TOP TEN” LIST**

This “Top Ten” checklist is a supplement to the *CoC Internal Wellness Checklist*. It is intended to highlight ten critical recordkeeping areas in the operation of the CoC Program. Grantees are encouraged to utilize this resource to proactively monitor the current “health” of their CoC grants.

Program Participant-Level Recordkeeping

The critical records to be maintained for each program participant include:

<p>1. <input type="checkbox"/> Participant Eligibility Ensure documentation of a participant’s homelessness or at-risk of homelessness status and disability, if applicable, is obtained at intake. 24 CFR 576.500(b) or (c); 24 CFR 578.103(a)(3), (4), or (5); and 24 CFR 103(a)(17)</p>	<p>4. <input type="checkbox"/> Housing Quality Standards (HQS) Ensure structures or units assisted with CoC funds meet HQS at lease-up and are re-inspected at least annually thereafter. 24 CFR 578.75(b) and 24 CFR 578.103(a)(8)</p>
<p>2. <input type="checkbox"/> Leasing and Rental Assistance Requirements Ensure rents charged for a structure or unit assisted with leasing or rental assistance funds meet standards of FMR or rent reasonableness. 24 CFR 578.49 and 24 CFR 578.51</p>	<p>5. <input type="checkbox"/> Use of a Coordinated Entry System Ensure participants are assessed and referred using the CoC’s coordinated assessment system. 24 CFR 578.23(c)(9) and 24 CFR 578.103(a)(17)</p>
<p>3. <input type="checkbox"/> Examination of Income Ensure participant income documentation is examined at intake and re-examined at least annually. 24 CFR 578.77(b)(4) and 24 CFR 578.103(a)(6)</p>	<p>6. <input type="checkbox"/> Use of Homeless Management Information System (HMIS) Ensure participants are entered in the CoC’s HMIS or a comparable database. 24 CFR 576.500(b) or (c); 24 CFR 578.103(a)(3)</p>

General Recordkeeping and Financial Files

The critical records to be maintained by each recipient and/or subrecipient include:

<p>7. <input type="checkbox"/> Standard Operating Procedures Maintain policies and procedures for intake, program operation, recordkeeping, and subrecipient oversight/monitoring to ensure that CoC funds are used appropriately. 24 CFR 578.103(a) and 24 CFR 578.23(c)</p>	<p>9. <input type="checkbox"/> Match Sources and Uses Ensure grant funds, except leasing funds, are matched with no less than 25 percent of cash or in-kind contributions from other sources. 24 CFR 578.73 and 24 CFR 578.103(a)(10)</p>
<p>8. <input type="checkbox"/> Financial Policies and Procedures Maintain fiscal controls, accounting procedures, and procurement procedures to ensure that CoC funds are used appropriately. *2 CFR Part 200</p>	<p>10. <input type="checkbox"/> Homeless Participation Enable homeless or formerly homeless persons the opportunity to participate in policymaking on the board of directors or other equivalent policymaking entity. 24 CFR 578.75(g)(1) and 24 CFR 578.103(a)(12)</p>

NOTE: For additional guidance, please refer to the following resource materials:

(1) Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program CoC Regulations at 24 CFR Part 578, and (2) CPD Monitoring Handbook 6509.2 REV-6 CHG-2 at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2

*** (BLOCK 8) If a recipient chooses to utilize this document for projects funded prior to the FY 2015 CoC competition, please refer to 24 CFR 578.103(a), 24 CFR Part 84 and 24 CFR Part 85 for applicable financial requirements.**

Internal Wellness Checklist for the Continuum of Care (CoC) Program

The *Internal Wellness Checklist* was developed in an effort to assist homeless providers to proactively implement its FY ____ CoC grant(s), thereby ensuring compliance with applicable regulations codified at 24 CFR Part 578. It is also designed to assist with determining the current "health" status of this CoC grant. Grant recipients are strongly encouraged to utilize this checklist prior to submitting the required APR to the U. S. Department of Housing and Urban Development.

Recipient Name: _____

Project Name: _____ Grant Term: 1 or 2 Yrs. _____

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

Date APR is Due to HUD: _____ Date APR Submitted: _____
(Not more than 90 days after the end of each CoC grant's performance period)

General Recordkeeping

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

Grant #: _____

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

Financial Files

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

Grant #: _____

- ___ 7. Documentation showing compliance with the Single Audit Act
24 CFR 578.99(g), 2 CFR 200 subpart F
- ___ 8. Documentation showing quarterly draw requests
24 CFR 578.85(c)(3)
- ___ 9. Documentation showing program income was expended prior to HUD draw requests, if applicable
24 CFR 578.97(b)

Participant Program Files

- ___ 1. Documentation participants are entered into HMIS or a comparable database
24 CFR 578.103(a)(3)
- ___ 2. Documentation participant was screened via centralized or coordinated assessment systems
24 CFR 578.23(c)(9)
- ___ 3. Documentation of Homelessness at intake
24 CFR 578.103(a)(3)
- ___ 4. Permanent Supportive Housing -Documentation of disability
24 CFR 578.37(a)(i)
- ___ 5. Transitional Housing- No more than 24 months of services provided except under documented extenuating circumstances
24 CFR 578.79
- ___ 6. Documentation of ongoing assessment of services
24 CFR 578.75(e)
- ___ 7. Documentation of examination of income (initial and recertification)
24 CFR 578.103(a)(7)(i)
- ___ 8. Documentation of initial and follow-up Housing Quality Standards inspections
24 CFR 578.75(b)(2)
- ___ 9. Leasing-Documentation that the unit/structure is not owned by recipient or subrecipient
24 CFR 578.49(a)
- ___ 10. Leasing-Documentation lease is between agency and landlord
24 CFR 578.49(b)(5)
- ___ 11. Leasing-Is there an occupancy agreement, lease or sublease in the file (for individual units)?
24 CFR 578.103(a)(17)
- ___ 12. Leasing-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.49(b)(1)
- ___ 13. Rents charged (including utilities) do not exceed HUD-Fair Market Rents
24 CFR 578.49(b)(2)
- ___ 14. Documentation supporting the correct/current utility allowance schedule is used
24 CFR 578.103(a)(17), 24 CFR 578.49(a)(3)

Grant #: _____

- ___15. Leasing-Documentation of occupancy charges with annual income calculations
24 CFR 578.77, 24 CFR 578.99(b)(6)
- ___16. Rental-Documentation the participant has a an executed lease agreement with the landlord
24 CFR 578.77, 24 CFR 578.51(d)(e)
- ___17. Rental-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.51(g)

NOTE: For additional guidance, please refer to the following resource materials:

(1) Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program CoC regulations at 24 CFR Part 578, and

(2) Monitoring handbook 6509.2 REV-6 CHG-2 that can be accessed at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2.

Completed by: _____

Signature: _____ Date: _____

Typed/Printed Name: _____ Title: _____

This document is to be maintained in the applicable CoC project file.

Fact Sheet for Safe Havens

FACT SHEET

SPECIAL GUIDANCE FOR RENEWAL SAFE HAVENS

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. Among other changes, the HEARTH Act repealed the "Safe Havens for Homeless Individuals Demonstration Program." This means that HUD will not fund any new safe haven projects under the CoC Program.

However, HUD will continue to renew funding for an existing safe haven project as long as:

- The project continues to operate within the scope of the grant in effect on August 30, 2012, such as serving the same population and number of persons or units in the same type of housing, within the constraints of the budgeted costs;
- The project remains in compliance with the safe haven definition and all regulatory requirements in place on August 29, 2012, the last effective date of the prior Supportive Housing Program regulations; and
- The CoC includes the Safe Haven project on the Priority Listing.

If a recipient substantially amends a grant for a safe haven project after August 30, 2012, the project must comply with all applicable CoC Program regulations and will be limited to apply for renewal funding under an eligible program component, such as transitional housing or permanent housing.

This fact sheet highlights the parts of the CoC Program interim rule most relevant to safe haven projects.

DEFINITION OF SAFE HAVENS

Safe Haven, as defined in the Supportive Housing Program, is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

To continue to be renewed as a Safe Haven, the project:

- Must be located in a facility, meaning a structure, or structures, or clearly identifiable portion of a structure or structures;
- Must allow 24-hour residence for an unspecified duration;
- Must have private or semi-private accommodations;
- Must limit overnight occupancy to no more than 25 persons;
- Must prohibit the use of illegal drugs in the facility;
- Must provide access to needed services in a low demand facility, but cannot require program participants to utilize them; and
- May include a drop-in center as part of outreach activities.

ELIGIBLE PARTICIPANTS FOR SAFE HAVENS

Safe haven projects as defined are for *literally homeless* individuals (as defined in the CoC Program interim rule in paragraph (1)(i) and (1)(iii) who reside on the streets or places not meant for human habitation and who have severe and persistent mental illness.

ELIGIBLE COSTS FOR SAFE HAVENS

Safe haven projects may be renewed for the same costs budgeted in the prior grant. [Note that a budget change of more than ten percent requires a substantial amendment of the grant, which

will trigger compliance with all requirements of the CoC Program interim rule.] Under the CoC Program, the eligible costs can be spent on the following expenses, which are each more thoroughly described in Subpart D of the CoC Program interim rule.

Leasing

Grant funds may be used to pay the costs of leasing a structure or structures, or portions of structures, to provide housing or social services. Leasing funds may not be used to lease structures owned by the recipient, subrecipient, their parent organizations, other related organizations, or a partnership in which any of these organizations are members.

Supportive Services

Grant funds may be used to pay the eligible costs of supportive services that address the special needs of program participants in safe havens. Supportive services must be needed to assist program participants in obtaining and maintaining housing.

Operating Costs

Grant funds may be used to pay the costs of day-to-day operations of a safe haven. Eligible costs include maintenance and repair, reserve for replacement of systems, building security, utilities, furniture, and equipment.

Project Administrative Costs

Grants funds may be used for project administration related to the general management and oversight of the CoC grant. Administrative costs include only the costs associated with the grant management, not the costs associated with program management.

Homeless Management Information Systems (HMIS)

Grants funds may be used to pay costs associated with contributing data to the HMIS designated by the CoC.

MATCH REQUIREMENTS FOR SAFE HAVENS

The recipient must match no less than 25 percent of the grant amount, less the amount requested for leasing, with cash or in-kind contributions from other sources. For in-kind contributions, the grantee may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that, if the match had to be paid for with grant funds, the costs would have been eligible.

Grant Administration Requirements

The grant administration requirements will remain the same, including:

- Drawing down funds in LOCCS
- Completing the Annual Performance Report
- Applying for renewal funds through the competitive grant process
- Complying with grant management and recordkeeping requirements

Additional Information

More information on safe havens is available on the [OneCPD Resource Exchange](#).

Homelessness Recordkeeping Requirements



Homeless Definition


CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

RECORDKEEPING REQUIREMENTS



	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution—one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> ○ discharge paperwork <u>or</u> written/oral referral, <u>or</u> ○ written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> • Certification that no subsequent residence has been identified; <u>and</u> • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> • Certification of no PH in last 60 days; <u>and</u> • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> • Documentation of special needs <u>or</u> 2 or more barriers
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Chronic Homelessness

The Chronic Homelessness web page on the HUD Exchange:

<https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/>

Chronic Homelessness Webinar Series

HUD has prepared three brief webinars to assist CoCs and HMIS Lead Agencies understand how HMIS can be used to assist in identifying people who are experiencing chronic homelessness.

- **Capturing the information about a client's living situation in HMIS** needed to calculate their chronic homeless status. Every HMIS-participating project has to record clients' living situation and disability status in HMIS at project entry and can simply record that information based on client self-response.
<https://www.hudexchange.info/trainings/courses/capturing-chronic-homeless-status-in-a-client-s-hmis-records/>
- **Using HMIS to document a client's chronic homeless status** for eligibility purposes. This is achieved by looking at a client's entries and exits in HMIS, rather than the self-reported data collected at each project entry.
<https://www.hudexchange.info/trainings/courses/using-hmis-to-document-a-client-s-chronic-homeless-status-for-eligibility-purposes/>
- **Reporting on chronic homelessness** combines these two concepts by looking at self-reported data AND enrollment histories for each client to generate reports on the people experiencing chronic homelessness in your CoC.
<https://www.hudexchange.info/trainings/courses/reporting-on-chronic-homelessness-based-on-hmis-records/>

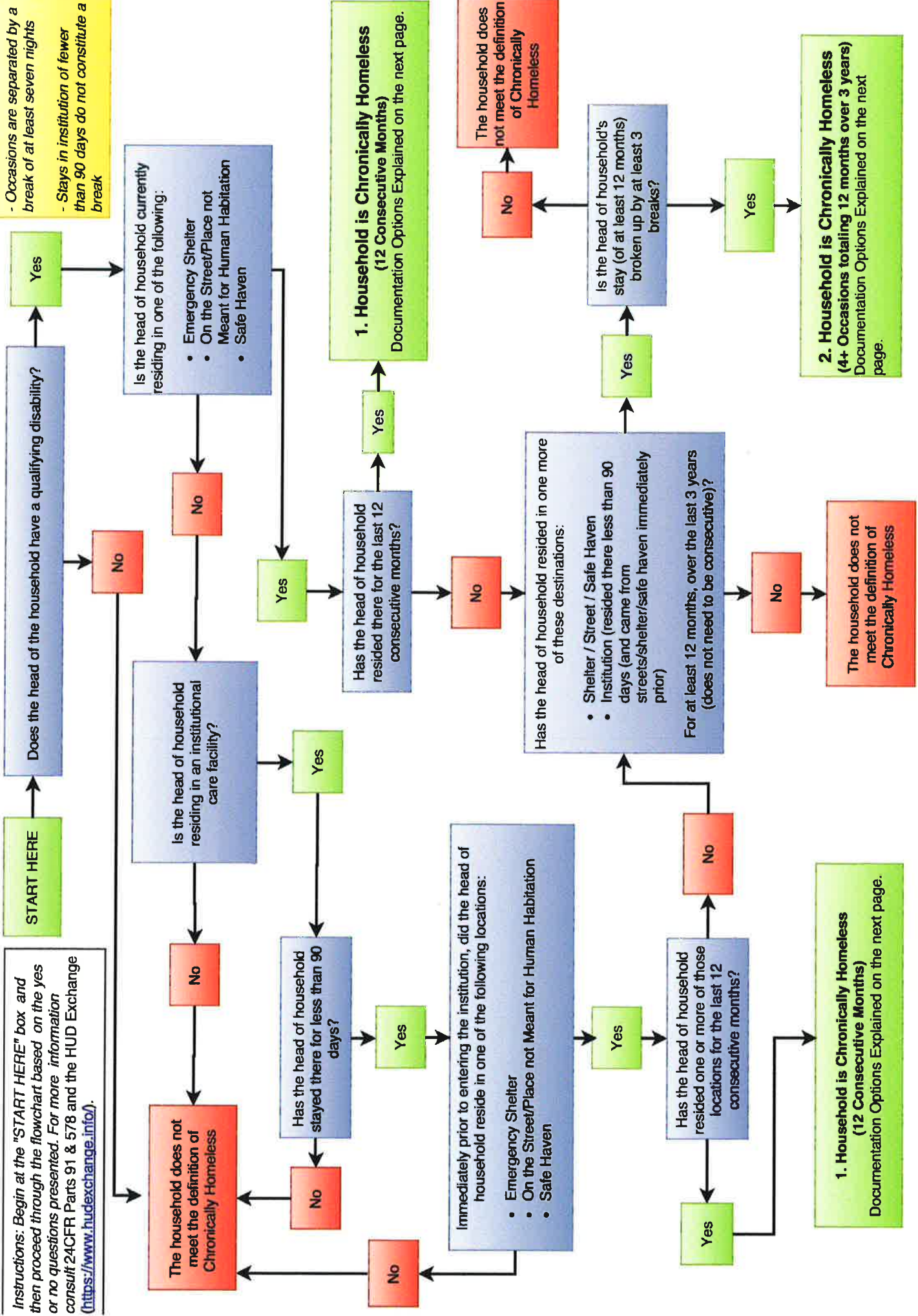
These webinars are intended to clarify the fundamental distinctions between these concepts and to provide information that can be woven into appropriate provider and end-user trainings.



Flowchart of HUD's Definition of Chronic Homelessness

Instructions: Begin at the "START HERE" box and then proceed through the flowchart based on the yes or no questions presented. For more information consult 24CFR Parts 91 & 578 and the HUD Exchange (<https://www.hudexchange.info/>).

Remember:
- Occasions are separated by a break of at least seven nights
- Stays in institution of fewer than 90 days do not constitute a break





Documentation Standards for Chronic Homelessness

Instructions: Based on your navigation of the flowchart on the previous page, locate the appropriate numbered situation on this page and follow the documentation standards noted. This tool summarizes the criteria for the new Chronically Homeless Definition. To review the exact language, please refer to 24 CFR Parts 91 & 578 and the HUD Exchange (<https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/>)

Situation	Documentation of Homelessness	Documentation of Disability
<p>1. Household is Chronically Homeless (12 Consecutive Months)</p> <ul style="list-style-type: none"> <input type="checkbox"/> HMIS record or record from a comparable database; or <input type="checkbox"/> Written observation by an outreach worker of the conditions where the individual was living; or <input type="checkbox"/> Written referral by another housing or service provider; or <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. <p>If the head of household is currently staying in an institution where they have been for less than 90 days (and were in a shelter/street/safe haven immediately prior) their Institutional Stay can be documented by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of client's residence, or <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. 	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Written verification of the disability from a licensed professional; <input type="checkbox"/> Written verification from the Social Security Administration; <input type="checkbox"/> The receipt of a disability check; or <input type="checkbox"/> Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence. 	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Written verification of the disability from a licensed professional; <input type="checkbox"/> Written verification from the Social Security Administration; <input type="checkbox"/> The receipt of a disability check; or <input type="checkbox"/> Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence.
<p>2. Household is Chronically Homeless (4+ Occasions totaling 12 months over 3 years)*</p> <p><i>*May include institution stays of <90 days</i></p>	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> HMIS record or record from a comparable database; or <input type="checkbox"/> Written observation by an outreach worker of the conditions where the individual was living; or <input type="checkbox"/> Written referral by another housing or service provider; or <input type="checkbox"/> Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of client's residence (for institutional stays of less than 90 days) <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. <p><i>* Each separate occasion MUST be documented (minimum of 3 breaks). 100% of the breaks can be documented by self- report.</i></p>	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Written verification of the disability from a licensed professional; <input type="checkbox"/> Written verification from the Social Security Administration; <input type="checkbox"/> The receipt of a disability check; or <input type="checkbox"/> Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence.

Important Notes:

- Each individual occasion needs to be fully documented.
- Breaks can be documented by self-report.
- For each Project:
 - 100% of households served can use self-certification for 3 months of their 12 months,
 - 75% of households served need to use 3rd Party documentation for 9 months of their 12 months, and
 - 25% of households served can use self-certification as documentation for any and all months.