Grantee Monitoring Tool & Guide Updated 7/13/16

IMPORTANT NOTE: This guide was compiled as a resource for projects funded through the CT BOS CoC based on the HUD CPD Monitoring Handbook 6509.2 REV6 and CT BOS Policies and Procedures. This guide contains the HUD monitoring standards determined by the CT BOS team to be the most significant and relevant for CT BOS projects. Additional areas may be reviewed by HUD during monitoring. For a complete listing of all HUD monitoring standards see:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/administraJon/hudclips/handbooks/cpd/6509.2
For CT BOS Policies and Procedures and a range of resources and tools to help support compliance with HUD and CT BOS requirements see: http://www.csh.org/csh-in-the-field/connecticut/2578-2/

Indicate Initials of Charts Selected and, if applicable, discharge/admission status				
#1 _____ ☐ Discharge ☐ Admission	#2 _____ ☐ Discharge ☐ Admission	#3 _____ ☐ Discharge ☐ Admission	#4 _____ ☐ Discharge ☐ Admission	#5 _____ ☐ Discharge ☐ Admission
#6 _____ ☐ Discharge ☐ Admission	#7 _____ ☐ Discharge ☐ Admission	#8 _____ ☐ Discharge ☐ Admission	#9 _____ ☐ Discharge ☐ Admission	#10 _____ ☐ Discharge ☐ Admission

☐ Applications, disposition records, and all related documents from at least one applicant recently denied admissions to the program - please have available a list of all applicants denied in the past 12 months.

Indicate Initials of Charts Selected:		
#1:	*#2:*	*#3:*

1. Visual Observation

1) Are financial records and valuables secured in limited access area?

❍ Yes ❍ No

Guidance: Recipients shall adequately safeguard all such assets and assure they are used solely for authorized purposes.

Reviewer Comments:

2) Are client files maintained in a confidential manner?

❍ Yes ❍ No

Guidance: Recipients shall adequately safeguard charts and assure they are used solely for authorized purposes. Reviewer will look for evidence of locked charts and for proper safeguarding of client names and other confidential materials .578.103(b) Confidentiality

Reviewer Comments:

3) Drug free work place statement

❍ Yes ❍ No

Guidance: Agency must have a drug free work place statement that complies with the requirements of 24 CFR 21.200 and has been posted in an area visible to all employees engaged on the CoC award.

Reviewer Comments:

4) Physical plant

A. Residents have adequate space with an acceptable place to sleep

❍ Yes ❍ No

B. Rooms have natural or mechanical ventilation

❍ Yes ❍ No

C. Residents have access to sufficient sanitary facilities

❍ Yes ❍ No

D. Heating and cooling is adequate/in working condition

❍ Yes ❍ No

E. Electricity/Illumination is adequate

❍ Yes ❍ No

F. Space/equipment to store and prepare food in a sanitary manner is suitable

❍ Yes ❍ No

G. Smoke detector is present on each occupied level of unit

❍ Yes ❍ No

H. Public areas have sufficient smoke detectors

❍ Yes ❍ No

I. Housing is maintained in a sanitary condition

❍ Yes ❍ No

Guidance: Items above are intended to inform a brief review of physical plant conditions. All housing assisted through leasing or rental assistance with CoC funds Must be inspected prior to occupancy and re-inspected at least annually using HUD Housing Quality Standards (see Section E)

Reviewer Comments:

2. Monitoring Checklist

a. Match/Leverage Documentation

5) Required match. Is the required match met? All above funds must be matched by at least 25% of funds or in-kind contributions from other sources. [578.53(a)]

❍ Yes ❍ No

Guidance: Agency must demonstrate by cash receipt in accounting records or MOU as specified below for in-kind that the required match was met for the program year being monitored.

Reviewer Comments:

6) In-Kind Match MOU. If the match has been met in whole or in part by services provided by a third party, is there a MOU that indicates: the hourly rate for the services (must be consistent with those paid for similar services); specific service to be provided; and profession of persons providing the service [578.73(c)(3)]

❍ Yes ❍ No

Reviewer Comments:

7) Eligibility of match. If match is met by in-kind contributions, would the services, goods, equipment, real property that is providing the match have been an eligible expense under Subpart D of the HEARTH CoC program? [578.73(c)(1)] ❍ Yes ❍ No
Guidance: For each component type (e.g. Rental Assistance, Supportive Services, Operating) eligible activities are defined in Subpart D of the HEARTH Interim Rule. Match must be used only for eligible activities)

Reviewer Comments:

8) Value of match. Do records confirm that the value of each matching contribution was calculated properly? [24 CFR Part 84.23; 24 CFR Part 85.24; 24 CFR 578.73(b); 24 CFR 578.73(c); 24 CFR 578.103(a)(10)]

❍ Yes ❍ No

Reviewer Comments:

9) Operating year of match. Has the recipient or its subrecipients documented the eligibility and value of the cash and in-kind match contributions for the operating year(s) reviewed (e.g., all eligible confirmation letters for cash contributions, real property, goods, equipment, volunteer services, and memorandums of understanding (MOUs) for third-party services were executed prior to grant agreement execution)? [24 CFR Part 84.23; 24 CFR Part 85.24; 24 CFR 578.73(b); 24 CFR 578.73(c)(3); 24 CFR 578.103(a)(10)]

❍ Yes ❍ No

Reviewer Comments:

10) Documentation of in-kind match. Does the grantee have documentation of the service hours provided where these hours are used as in-kind match? [578.73(c)(3)(ii)]
❍ Yes ❍ No
Guidance: Volunteer services shall be documented and, to the extent feasible, supported by the same methodology used by the recipient for employees; the basis for determining the value of personal services must be documented.

Reviewer Comments:

11) Documentation of leverage. Does the grantee have required documentation of leveraging as defined in the NOFA under which the project was funded?
❍ Yes ❍ No

Guidance: Commitment letter(s) on file are dated and meet other requirements as per the relevant NOFA and demonstrate a minimum of 150 percent leveraging . A written commitment may include signed letters, memoranda of agreement, or other documented evidence of a commitment. All written commitments must be signed and dated by an authorized representative, and should include the name of the contributing organization, the type of contribution (cash, child care, case management, etc.), the value of the contribution, and date the contribution will be available. It is also important that the written commitment include the project name and be addressed to the project applicant or subrecipient.

Reviewer Comments:

b. Administrative costs and requirements

12) Administration fee. Review APR and grant application for amounts requested for administrative expenses. Calculate the percentage that administrative costs represent of the total grant.
Percent of administrative funding: _____ (CT BOS projects restricted to 7% or less)
❍ Yes ❍ No

Reviewer Comments:

13) Eligibility of Administrative Costs: If administrative funds are used for general management, oversight and coordination, has the grantee included the entire salary, wages and related costs of persons whose primary activity is program administration or has it pro-rated the share of time of each person whose job includes any administrative function. Has the grantee used only one of these methods for each fiscal year grant? [578.89(a)(1)]
❍ Yes ❍ No

Reviewer Comments:

14) Allocation of Administrative costs. Have administrative costs been allocated to the following eligible activities: general management, oversight and coordination including travel costs associated with monitoring; contracts for legal, accounting or audit services; costs for goods and services required for administration of the program including equipment rental and purchase, insurance, utilities, supplies, rental and maintenance of office space; Training on Continuum of Care requirements (providing or participating in HUD sponsored trainings); or Environmental Review [578.59(a)] ❍ Yes ❍ No

Guidance: Reviewers will request a report showing administrative expenses drawn down and expended during the contract period.

Reviewer Comments:

15) Staff eligibility for administrative costs. Does a randomly selected review of administrative personnel costs reveal that staff paid from CoC funds are working on eligible CoC funded activities? [578.59]

❍ Yes ❍ No

*Guidance: If personnel costs are assigned to administration, reviewers will look for backup (e.g. time sheets) that shows staff was working on administrative activities for the time billed*Reviewer Comments:

Reviewer Comments:

16) Homeless Participation. Does the grantee meet the participation requirements? (Each grantee and sub-grantee must have at least one homeless or formerly homeless individual on the board of directors or equivalent policy making entity. Each grantee and sub-grantee must to the maximum extent practicable involve homeless people through employment volunteer services or other means in maintaining, operating, and providing supportive services.) [578.75(g)]

❍ Yes ❍ No

Reviewer Comments:

17) Nondiscrimination requirements. Does the project comply with the nondiscrimination set forth in 24 CFR 5.105(a)? [578.93 (a)], including guidance on the application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing ❍ Yes ❍ No

Guidance: Recipients, subrecipients and partner agencies are subject to federal civil rights laws, including Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990. For more information about these laws, or www.hud.gov/offices/fheo/FHLaws/index.cfm. For guidance on the application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing see: http://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHAStandCR.pdf

Reviewer Comments:

18) Affirmatively furthering fair housing. Did the recipient implement its programs in a manner that affirmatively furthers fair housing, meaning it has implemented all of the following: The recipient affirmatively marketed its housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who were least likely to apply in the absence of special outreach, and maintained records of those marketing activities; If the recipient encountered a condition or action that impeded fair housing choice for current or prospective program participants, the recipient provided such information to the jurisdiction(s) that provided the Certification of Consistency with the Consolidated Plan? The recipient provided program participants with information on rights and remedies available under applicable federal, state, and local fair housing and civil rights laws? ❍ Yes ❍ No

Reviewer Comments:

C. Financial Management

19) Fiscal policies, procedures & records. Do the recipient and its subrecipients have written policies and procedures ensuring that the CoC program funds are used in accordance with requirements and sufficient records to enable HUD and the recipients to determine whether CoC requirements are being met? [24 CFR 578.103(a)]

❍ Yes ❍ No

Reviewer Comments:

20) Source & application of funds. Do the recipient and its subrecipients maintain records that identify adequately the source and application of funds for Federally-sponsored activities?

Guidance: These records shall contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, outlays, income and interest.

[24 CFR 84.21(b)(2); 24 CFR 85.20]

❍ Yes ❍ No

Reviewer Comments:

21) Internal controls. Do the fiscal records indicate that the grantee has effective internal control over, and accountability for, all grant funds, property and other assets and fiscal records that are adequately safeguarded? [84.21(b) and 85.20(b)]

❍ Yes ❍ No

Reviewer Comments:

22) Recording of expenses. Do the grantees accounting records identify expenditures according to eligible activities [578.37-578.59] ❍ Yes ❍ No

Reviewer Comments:

23) Expenditure eligibility. Randomly select financial transactions. Does a review of these transactions reveal that CoC expenditures were for eligible costs, that the transactions were

supported by adequate source documentation and demonstrate that program expenses are allowable, allocable, and reasonable? [578.37-578.59; 84.21(b); and 85.20(b)]

❍ Yes ❍ No

Guidance: For each component type (e.g. Rental Assistance, Supportive Services, Operating) eligible activities are defined in Subpart D of the HEARTH Interim Rule. For a description of what makes costs allowable, allocable and reasonable see https://www.hudexchange.info/course-content/housing-counseling-webinar-understanding-indirect-cost-rates-and-cost-allocation-plans/Housing-Counseling-Webinar-Understanding-Indirect-Cost-Rates-and-Cost-Allocation-Plans-Slides.pdf

Reviewer Comments:

24) Rental assistance expenditure eligibility. Were grant funds expended for rental assistance only for some or all of the following eligible costs, or the staff and overhead costs directly related to carrying out these eligible costs: rental assistance, administering rental assistance, security deposits, first/last months' rent, vacancy payments, and damages?

❍ Yes ❍ No

Reviewer Comments:

25) Supportive services expenditure eligibility. Were supportive services paid with grant funds necessary to assist program participants to obtain and maintain housing? [24 CFR 578.53(a)(1); 24 CFR 578.103(a)(9)]

❍ Yes ❍ No

Reviewer Comments:

26) Operating expenditure eligibility - security. If grant funds were expended on building security, were payments for a structure where more than 50 percent of the units or area was paid for with grant funds? [24 CFR 578.55(a)(4); 24 CFR 578.103(a)(17)]

❍ Yes ❍ No

Reviewer Comments:

27) Operating expenditure eligibility – maintenance, repair, utilities. If operating costs were expended on the maintenance and repair of housing or utilities, do records confirm that

such costs are not included in the lease (if a lease has been executed)?[24 CFR 578.55(c); 24 CFR 578.103(a)(17)]

❍ Yes ❍ No

Reviewer Comments:

28) Ineligible expenses. Does a review of program expenditures indicate the absence of any unallowable costs including entertainment, contributions and donations, fines and penalties, or general governmental expenditures, including salary and expenses of the chief executive officer of the recipient/subrecipient(s)? [24 CFR 578.99(e); OMB Circular A-87 (for governments) or OMB Circular A-122 (for nonprofit organizations)] ❍ Yes ❍ No

Reviewer Comments:

29) Lobbying. Does a review of the expenditures indicate that costs related to lobbying political activities have not been charged to the program?[24 CFR 578.99(e); OMB Circular A-87 (for governments) or OMB Circular A-122 (for nonprofit organizations)] ❍ Yes ❍ No

Reviewer Comments:

30) Payroll documentation. Are charges for salaries and wages based on payrolls documented by appropriate time sheets (including timesheets indicating actual times worked) and approved by responsible official of the grantee? [OMB Circular A110 & A122] ❍ Yes ❍ No

Reviewer Comments:

31) Allocation of salaries. If salaries involve payments from more than one CoC activity line (i.e., Rental Assistance, Leasing, Operating Costs, and Supportive Services) can payments for wages be clearly tracked to the eligible CoC activities? [84.21(b) and 85.20(b)]

❍ Yes ❍ No

Reviewer Comments:

32) Program Income. Has program income earned by grantee been added to funds committed to project by HUD and used for eligible activities under 24 CFR Part 578 [578.97(b)]

❍ Yes ❍ No

Reviewer Comments:

33) Indirect costs. If indirect costs have been charged, does the grantee have an indirect cost rate proposal that is in accordance with OMB Circulars A-87 or A-122, as applicable? [578.63]

❍ Yes ❍ No

Reviewer Comments:

34) Separation of duties: is there evidence that financial duties are separated so that no one individual has complete authority over a financial transaction? [OMB Circular A110 & A122]

❍ Yes ❍ No

Reviewer Comments:

35) LOCCS. Does withdrawal information from the Line of Credit Control System (LOCCS) match the information from the CoC grantee's drawdown voucher requests and is project drawing down at least quarterly? [OMB Circular A110 & A122] ❍ Yes ❍ No

Reviewer Comments:

36) Travel. Review a sample of travel expenditures. Were they necessary and proper? Was reimbursement in accordance with GSA policies? [OMB A-122]

❍ Yes ❍ No

Reviewer Comments:

37) Cash payments. Did a review of the recipient's and its subrecipients' financial records demonstrate that cash payments were not being provided directly to the program beneficiaries?

❍ Yes ❍ No

Guidance: Gift cards are considered by HUD to be cash payments and are not allowable.

Reviewer Comments:

38) Equipment Records: Does the grantee maintain equipment records that contain information required (item, date acquired, cost, serial number, Federal share of acquisition)? [85.32 & 84.34]

❍ Yes ❍ No

Reviewer Comments:

39) Equipment Inventory: Has a physical inventory of the equipment been taken and the result reconciled with the property records in the past two years? [85.32 and 84.34]

❍ Yes ❍ No

Reviewer Comments:

40) Equipment Disposition: Do the recipient and subrecipient meet the requirement for procedures that require efforts to obtain the highest possible return for sale of equipment [24 CFR 84.34(f)(6); 24 CFR 85.32(d)(5)] and If grant-funded equipment was sold during the period under review, is there documented evidence to demonstrate that efforts were made to obtain the highest possible return?
[24 CFR 84.34(f)(6); 24 CFR 85.32(d)(5)]

❍ Yes ❍ No

Reviewer Comments:

41) Chart of accounts. Does the recipient's and its subrecipients' chart of accounts include a complete listing of the account numbers used to support the controls required to ensure that resources used do not exceed resources authorized? [24 CFR 85.20]

❍ Yes ❍ No

Reviewer Comments:

42) Organization chart. Do the recipient and its subrecipients have an organization chart that illustrates the actual lines of authority/responsibility? [24 CFR 85.20]

❍ Yes ❍ No

Reviewer Comments:

43) Employee responsibilities. Are primary duties for key employees of the recipient and its subrecipients defined?[24 CFR 85.20]

❍ Yes ❍ No

Reviewer Comments:

44) Audit. If Single Audits are required, does the recipient and its subrecipients have a system or methodology to ensure that such audits are conducted? CFR 84.26(a) and 24 CFR 85.26(b). And If single audits are required for any recipient or its subrecipient(s), is there documentation that the audits have been reviewed for compliance and that the recipient or subrecipient has taken appropriate follow-up actions, if necessary? [24 CFR 84.25; 24 CFR 85.26]. If singe audits are not required, has the recipient and its subrecipients ensured that a standard audit was conducted *(CT BOS Best Practice recommendation)*.

❍ Yes ❍ No

Reviewer Comments:

45) Fiscal controls. Did the recipient establish fiscal controls and accounting procedures to assure the proper disbursal of, and accounting for, grant funds to ensure that all financial transactions were conducted, and records maintained, in accordance with generally accepted accounting principles? [24 CFR 578.23(c)(5); 24 CFR 578.103(a)(17)]

❍ Yes ❍ No

Reviewer Comments:

46) Procurement procedures. Do the nonprofit recipient and its subrecipients use established written procurement procedures? [24 CFR 84.44(a)] ❍ Yes ❍ No

Reviewer Comments:

47) Procurement standard of conduct. Do the recipient and its subrecipients meet the requirement to have a written standard of conduct governing the performance of its employees engaged in the award and administration of contracts? [24 CFR 84.42; 24 CFR 85.36(b)(3)]

❍ Yes ❍ No

Reviewer Comments:

48) Procurement free competition. Did the recipient and its subrecipients meet the requirement that all procurement transactions are conducted in a manner to provide, to the maximum extent practical, open and free competition? [24 CFR 84.43; 24 CFR 85.36]

❍ Yes ❍ No

Reviewer Comments:

49) Unnecessary purchase. Did the recipient and its subrecipients meet the requirement to establish and follow written procedures to avoid purchasing unnecessary items?[24 CFR 84.44(a)(1); 24 CFR 85.36(c)(1)(ii)]

❍ Yes ❍ No

Reviewer Comments:

50) Conflicts of interest. Does the recipient/subrecipient, their employees, agents, consultants, officers, and elected or appointed officials meet the conflict of interest requirements (no financial interests or benefit from assisted activity on part of staff (or person with whom the staff member has immediate family or business ties) during his/her tenure with organization and one year following his/her tenure. This includes, procurement, rent reasonableness determinations and housing quality inspections for a property owned by the grantee or sub-grantee)? [578.95]

❍ Yes ❍ No

Guidance: Sample "Rent Reasonableness Checklist and Certification" form available at: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc

Reviewer Comments:

d. Reporting and Contract Requirements

51) APR. Was the most recent APR submitted to HUD no later than 90 days from the date of the end of the project's grant term? [578.103 (e)] ❍ Yes ❍ No

Reviewer Comments:

52) HMIS. Has the recipient or its subrecipents submitted client data to the CoC- designated HMIS (or comparable database, as applicable) for all program participants assisted?

❍ Yes ❍ No

Reviewer Comments:

53) Close-out. Were all close out reports required by HUD submitted no later than 90 days from the date of the end of the project's grant term and as instructed in the closeout certification issued by HUD? [578.109 (b)]

❍ Yes ❍ No

Balance Remaining indicated on Closeout Certification: $_____

Reviewer Comments:

54) Grant amendment. If there was a significant change made that required a grant amendment, is an executed amendment on file? Did the sub-CoC review and approve any grant amendments prior to submission to HUD and did the grantee notify the BOS SC of any approved amendments? Significant changes include, a change of recipient, a shift in a single year of more than 10 percent of the total amount awarded under the grant for one approved eligible activity category to another activity and a permanent change in the subpopulation served by any one project funded under the grant, as well as a permanent proposed reduction in the total number of units funded under the grant. [578.105 (a)] ❍ Yes ❍ No

Reviewer Comments:

55) Number of Participants. Is the number of participants currently being served consistent with the number in the approved application?

❍ Yes ❍ No

Reviewer Comments:

e. Housing Assistance

56) Housing Quality Standards. Has all housing assisted through leasing or rental assistance with CoC funds been inspected prior to occupancy and re-inspected at least annually? [587.75(b)]

❍ Yes ❍ No

Reviewer Comments:

57) Habitability Standards. Has all assisted housing not required to be inspected using Housing Quality Standards been inspected for habitability prior to occupancy and re-inspected at least annually?

Guidance: CT BOS Best Practice recommendation; see visual observation section on Physical Plant for suggested criteria.

❍ Yes ❍ No

Reviewer Comments:

58) Occupancy Agreements. Does grantee have a signed occupancy agreement/lease with all program participants residing in housing (permanent housing must have an initial one year agreement renewable for a minimum ter of 1 month and terminable only for cause; transitional must have at least a monthly agreement; Rental assistance projects must have leases between the program participant and the landowner or sublessor. Leasing projects must have a lease between the recipient or subrecipient and the landowner. [578.77(a); 578.51(l); 578.49(b)(8)]). Agreement/lease should provide formal due process rights.

❍ Yes ❍ No

Reviewer Comments:

Permanent Supportive and Transitional Housing Calculation of occupancy charges/rent.

59) A. Calculation. If grantee imposes occupancy charges is income calculated in accordance with 24 CFR 5.609 and 5.611 and is the rent charged not greater than 30% of family's adjusted income or 10% of gross income? [578.77(b)] ❍ Yes ❍ No

Guidance: If grantee has used the CPD income calculator and this is documented by system printouts, then no further assessment is required. If the grantee is using something other than the CPD income calculator, review calculations in selected client's charts to be sure HUD requirements are followed. HUD CPD Income Calculator available at:

https://www.hudexchange.info/resource/2079/cpd-income-eligibility-calculator/

Reviewer Comments:

B. Adjustment. Is rent adjusted upon notification of change in income? [578.77(c)]

❍ Yes ❍ No

Reviewer Comments:

C. Review. Is income reviewed annually or when there is a change in income and is documentation of the review on file? [578.77(c)]

❍ Yes ❍ No

Reviewer Comments:

RRH Calculation of occupancy rent

60) A. Calculation. Is income calculated in accordance with 24 CFR 5.609 and 5.611 and is the rent charged not less than 30% of family's adjusted income? Is total rental assistance received by each participant not more than $2500 in the initial 3 month period, $2000 for months 4 to 6, $1500 for months 7 to 9, and $1000 for months 10 to 12 or has the program documented approval for a higher amount of assistance by the CAN or, as necessary, the CT BOS chairs if relevant CAN is not operational?

❍ Yes ❍ No

Reviewer Comments:

Only for compliance with HUD regs, not BOS reqs

B. Adjustment. Is rent adjusted upon notification of change in income? [578.77(c)]

❍ Yes ❍ No

Reviewer Comments:

C. Review. Is income reviewed at least every 90 days or when there is a change in income and is documentation of the review on file?

❍ Yes ❍ No

Reviewer Comments:

61) Income documentation. Where an occupancy charge or rent was charged do participant files document: income evaluation form completed by the recipient [24 CFR 578.103(a)(6)(i)]; source documents for the assets held by the program participant and income received before the date of the evaluation (e.g., most recent wage statements, unemployment compensation statement, public benefits statements, bank statement)[24 CFR 578.103(a)(6)(ii)]; if source documents were unavailable, a written statement by the relevant third party or the written certification by the recipient's intake staff of the oral verification by the relevant third party of

the income the program participant received over the most recent 3-month period; 24 CFR 578.103(a)(6)(iii)]; or if source documents and third-party verification were unavailable, the written certification by the program participant of the amount of income that the program participant was reasonably expected to receive over the 3-month period following the evaluation? 24 CFR 578.103(a)(6)(iv) ❍ Yes ❍ No

Reviewer Comments:

62) Rent Reasonableness. If grant funds are used to lease individual units or if rental assistance is provided, has the grantee conducted a rent reasonableness determination? [578.49(b) and 578.51(g)] ❍ Yes ❍ No

Guidance: When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space. The recipient or subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit.

Reviewer Comments:

63) FMR Ceilings. If CoC grant funds are used to lease individual units, has the grantee observed the limitation that rents may not exceed Fair Market Rents? [578.49(b)]

❍ Yes ❍ No

Reviewer Comments:

64) Security Deposits. If the grantee uses CoC funds for security deposits, are the amounts of the deposits not in excess of two months' rent? [578.49(b) and 578.51(a)]

❍ Yes ❍ No

Reviewer Comments:

65) Rental assistance damages. For property damages paid, were expenditures for a one-time cost per program participant AND not exceeding 1-month's rent to pay for any damage to housing due to the action of a program participant? [24 CFR 578.51(j); 24 CFR 578.103(a)(17)]

❍ Yes ❍ No

Reviewer Comments:

66) Limitation on transitional housing. Has the grantee observed the 24 month time limit for transitional housing? [578.79] ❍ Yes ❍ No

Guidance: A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living (should be documented in client chart). However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.

Reviewer Comments:

67) Lead based paint visual inspection. Has the grantee conducted a visual assessment of all units receiving financial assistance if the unit was constructed prior to 1978 and if there will be a child under 6 years of age or a pregnant woman residing in the unit? Have staff conducting the assessment completed the HUD web-based training? [578.99(f)]

❍ Yes ❍ No

Guidance: Units must be inspected to identify deteriorated paint (i.e., chipping, cracking, chalking, damaged, separated from substrate). For more information see: *http://www.hud.gov/offices/lead/training/visualassessment/h00100.cfm*

Reviewer Comments:

68) Lead based paint information. Do project files consistently document receipt by applicants and occupants of the Lead Hazard Information Pamphlet? [24 CFR 35.1010(b)]

❍ Yes ❍ No

Guidance: Pamphlet available at:
http://www.hud.gov/offices/lead/library/enforcement/pyf_eng.pdf

Reviewer Comments:

69) Lead based paint warning, disclosure, acknowledgement - leasing Do leasing participant files include the lead warning statement, disclosure of known information on lead-based paint, and acknowledgement of receipt of this information?
https://www.hudexchange.info/resources/documents/MakingItWorkSampleForms.pdfL

❍ Yes ❍ No

Guidance: Forms available at:
https://www.hudexchange.info/resources/documents/MakingItWorkSampleForms.pdfL

Reviewer Comments:

70) Lead based paint data sharing – TBRA. Does the program share housing data with the local health department on a quarterly basis in an attempt to match assisted unit addresses with lead-poisoned children? [24 CFR 35.1225(f)]

❍ Yes ❍ No

Reviewer Comments:

71) Environmental Review. Has the grantee complied with environmental review requirements (Grantee will not acquire, rehabilitate, convert, lease, provide sponsor or project based rental assistance, repair, dispose of, demolish or construct property or expend HUD funds until an Environmental Review under 24 CFR part 50 has been completed and the grantee has received HUD approval of the property)? [578.31]

❍ Yes ❍ No

Guidance: Monitors will review files for evidence of environmental review and notice of HUD approval. For more guidance see:
http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_8698.pdf
https://www.hudexchange.info/environmental-review/

Reviewer Comments:

72) Dwelling size. Does the dwelling unit have at least one bedroom or living/sleeping room for each two persons AND that children of the opposite sex, other than very young children, were not required to occupy the same bedroom or living/sleeping room?
[24 CFR 578.75(c)(1); 24 CFR 578.103(a)(8)]❍ Yes ❍ No

	Chart #1	*Chart #2*	*Chart #3*	*Chart #4*	*Chart #5*	*Chart #6*	*Chart #7*
Initials							
# People							
# Bedrms							

Reviewer Comments:

73) Household composition changes. If household composition changed during the term of assistance, did the recipient or its subrecipients relocate the household to a more appropriately sized unit and continue access to appropriate supportive services? [24 CFR 578.75(c)(2); 24 CFR 578.103(a)(8)] ❍ Yes ❍ No

Reviewer Comments:

74) Retention of assistance in PSH. Has a family been able to retain rental assistance until the expiration of the lease in effect when qualifying member died, was incarcerated, or institutionalized? [578.75 (i)] ❍ Yes ❍ No

Reviewer Comments:

75) Program fees. Grantee may not charge program participants any fees other than rent. Has the grantee complied with this requirement? [578.87(d)]

❍ Yes ❍ No

Reviewer Comments:

76) Restriction on combining funds. Does the project comply with HUD's restriction on combining funds (i.e., In a single structure or housing unit, the following types of assistance may not be combined: Leasing and acquisition, rehabilitation, or new construction; Tenant-based rental assistance and acquisition, rehabilitation, or new construction; Short- or medium-term rental assistance and acquisition, rehabilitation, or new construction; Rental assistance and leasing; or Rental assistance and operating)? [578.87 (b)] ❍ Yes ❍ No

Reviewer Comments:

f. Participant eligibility

Chronic Homelessness

77) A. Designated. If the project has designated /prioritized chronically homeless beds, does the correct portion of households assisted meet the definition of chronic homelessness and has the grantee maintained documentation that applicable households served meet HUD's definition of chronic homelessness? [578.3]

❍ Yes ❍ No

Guidance: HUD Notice: Prioritizing Persons Experiencing Chronic Homelessness in PSH & Recordkeeping Requirements for Documenting Chronic Homeless Status and HUD final definition on chronic homelessness

https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/

https://www.federalregister.gov/articles/2015/12/04/2015-30473/homeless-emergency-assistance-and-rapid-transition-to-housing-defining-chronically-homeless

Reviewer Comments:

78) Minimum commitment. Does every household newly admitted meet the definition of chronically homeless and does the project use the order of priority established in *HUD Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons*, which defines which chronically homeless people get priority access to PSH beds, [CT BOS Policies and Procedures – Applies to PSH only beginning January 2015] ❍ Yes ❍ No

Guidance: (Full notice available at:

https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/

Reviewer Comments:

79) Homeless status. Has the grantee maintained documentation that indicates that all households served meet HUD's definition of homelessness? Have transitional housing projects complied with the CT BOS requirement to serve literally homeless participants coming from emergency shelters and unsheltered locations only? [578.3; CT BOS Policies and Procedures]

❍ Yes ❍ No

Reviewer Comments:

80) Disability status for permanent supportive housing. Do all households served in permanent supportive housing meet HUD's definition of a disabled household? [578.37(a)]

❍ Yes ❍ No

Reviewer Comments:

81) Rapid Rehousing. Are CoC grants providing rapid rehousing and funded through the 2013-2014 competition only serving families who were in emergency shelter or were unsheltered prior to receiving rapid rehousing assistance? [2013 NOFA I, II, A, 3 b "Rapid rehousing projects must serve households with children living on the streets or in emergency shelter."]

❍ Yes ❍ No

Reviewer Comments:

82) Rapid Rehousing. Is the program only serving clients with 1) income initially at or below 50% of AMI, 2) income at or below 30% of AMI at each 90 day re-evaluation, and 3) who have completed a VI-SPDAT during their current episode of homelessness? [CT. BoS Policies and Procedures] ❍ Yes ❍ No

Guidance: As per CT BOS P&P, households with no income at initial or re-evaluation are eligible. As per HUD, households who are eligible for PSH and awaiting PSH placement may receive RRH assistance and will retain their homeless and, if applicable, chronic homeless status.

Reviewer Comments:

83) Rapid rehousing. Is the program prioritizing all unsheltered households regardless of length of their current episode of homelessness and sheltered households whose current episode of literal homelessness has been at least seven days in duration and is the program documenting whether households meet this criteria using HMIS data and, as necessary, permissible written documentation of unsheltered homelessness? (CT BoS Policies and Procedures) ❍ Yes ❍ No

Guidance: Documentation standards are available in HEARTH Homeless Definition Final Rule at https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/

Reviewer Comments:

84) Rapid rehousing. Has the project complied with the following HUD and CT BOS limitations on rental assistance and supportive services: 1)rental assistance may not be provided for longer than 24 months 2) supportive services may not be provided for longer than 6 months after rental assistance ended 3) supportive services alone (i.e., provided without rental assistance) may be provided for no more than 6 months after homelessness has ended 4) Participants may receive rental assistance of no more than the following percentages of FMR for each of the indicated time frames (security deposits are excluded from these limits): months 1-3 100% of FMR, months 4 to 6: 80% of FMR, months 7 to 9: 60% of FMR,

months 10 to 12: 40% of FMR? [578.37(a)] [24 CFR 578.37(a)(1)(ii)(D); 24 CFR 578.103(a)(17)]; HUD AAQ Question ID29873) ❍ Yes ❍ No

Reviewer Comments:

85) Transitional housing. Households are moved to permanent housing within 24 months. [578.37(a)];

❍ Yes ❍ No

Reviewer Comments:

86) Transitional Housing.. Have services been provided to participants for a period not in excess of six months after they have been placed in permanent housing (TH) or after rental assistance stops (RRH)[578.53(b)]

❍ Yes ❍ No

Reviewer Comments:

87) Transitional Housing. Is the program only serving clients with income at or below 30% of AMI? [CT. BoS Policies and Procedures] ❍ Yes ❍ No

Reviewer Comments:

88) Transitional Housing. Are all households screened for diversion prior to admission and only admitted if no other options are available? [CT. BoS Policies and Procedures]

❍ Yes ❍ No

Reviewer Comments:

89) Use of CAN. Did the recipient/subrecipient use the centralized or coordinated assessment system established by the CoC? 24 CFR 578.(a)(8)?

❍ Yes ❍ No

Reviewer Comments:

90) Written intake procedures. Do the records demonstrate that 1) the recipient had written intake procedures in place to ensure that documentation of program participants' homeless and disability (if applicable) status is maintained in accordance with the program requirements 2) that those procedures require obtaining documentation at project intake of the evidence relied upon to establish and verify homeless status, 3)that the procedures establish the order of priority for obtaining evidence of homelessness as first third-party documentation, second intake worker observations, third self-certification, and that the recipient/subrecipient following the procedures?[24 CFR 578.103(a)(3)-(4); 24 CFR 576.500(b); 24 CFR 576.500(c)]

❍ Yes ❍ No

Guidance: Sample Written Intake procedures available at http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/2578-2/ (PENDING)

Reviewer Comments:

91) Equal Access. Does program comply with HUD Final Rule on Equal Access?

❍ Yes ❍ No

Guidance: Final Rule available at https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/

Reviewer Comments:

92) Religious discrimination. In providing services and outreach activities related to such services supported in whole or part with CoC Program funds, do records document that the recipient did not discriminate against a program participant or prospective program participant on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice? [24 CFR 578.87(b)(1); 24 CFR 578.87(b)(ii); 24 CFR 578.103(a)(13]

❍ Yes ❍ No

Reviewer Comments:

93) Religious activities. For recipients that engage in explicitly religious activities, do records document that the recipient performed such activities and offered such services outside of programs that are supported with federal financial assistance separately, in time or location, AND indicated that participation in such religiously explicit activities was voluntary for program participants AND did not use CoC Program funds to support or engage in explicitly religious activities AND if a program participant objected to the religious character of a

recipient that provided services, do records document that the recipient undertook reasonable efforts to identify and refer the program participant to an alternative provider within a reasonably prompt time?[24 CFR 578.87(b)(2); 24 CFR 578.103(a)(13)]

❍ Yes ❍ No

Reviewer Comments:

94) Referrals from other systems of care. Before accepting participants into CoC programs from the Mental Health, Foster Care, Correctional or Public Health Systems, providers will work to ensure that all other discharge options have been exhausted. Accepting a person directly from publicly-funded institutions should only be considered if there are no other viable housing options and the person meets the eligibility criteria for the bed or unit. [CT. BoS Policies and Procedures] Does program being monitored meet these conditions?

❍ Yes ❍ No

Reviewer Comments:

g. Services

95) Rapid Rehousing: Assessment of need for rapid rehousing services. Has the grante re-evaluated all participants receiving rental assistance and/or case management at least every 90 days to determine that the participant lacks resources and support networks necessary to retain housing and that the continuation of assistance is necessary to avoid literal homelessness? [578.37(a) and CT BOS Policies and Procedures – HUD requires annual assessment, CT BOS requires at 90 day intervals). ❍ Yes ❍ No

Reviewer Comments:

96) Rapid Rehousing: Has the grantee demonstrated use of a progressive engagement model (i.e., starting with a small amount of assistance for the shortest period of time possible to help resolve homelessness then adding more resources, only as necessary, if the less intensive intervention is unsuccessful.)? Has the grantee limited assistance to the maximum amounts allowable by the CT BOS CoC? (CT BOS Policies and Procedures) ❍ Yes ❍ No

Reviewer Comments:

97) Rapid Rehousing: Frequency of Case Management . Have participants met with case managers not less frequently than once/month? [578.37(a)]

❍ Yes ❍ No

Reviewer Comments:

98) On-going assessment of supportive services needs. Has the grantee conducted on-going assessments of participant's supportive services needs including the services needed, the availability of such services, and the coordination of services to ensure long-term housing stability? Is this documented in sampled client charts? [578.75(e)]

❍ Yes ❍ No

Guidance: Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly. Sample assessment available at: http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/assuring-quality-in-connecticut

Reviewer Comments:

99) Services for Permanent Supportive Housing, SSO, TH. Has the grantee made supportive services available to meet the needs of program participants and made adjustments as necessary based on assessments, AND did participants receive supportive services for the duration of their stay? ([578.37(a)] required by HUD for PSH, CT BOS Best Practices Recommendation for SSO/TH)

❍ Yes ❍ No

Guidance: Monitors will look for evidence that services are provided with a frequency that is responsive to participant needs (e.g. evidence of appropriate and timely intervention on identified issues that threaten housing stability or health/wellbeing; evidence that, in general, contact/attempts occur at least two times/month; contact/attempts that are less are supported by an assessment indicating a lower level of service need); Sample service plan available at: http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/assuring-quality-in-connecticut

Reviewer Comments:

100) Ineligible costs. Services provided under 'supportive services' must be specifically identified under 578.53(e). Services provided may not exceed the scope of allowable services specified in 578.53. Has the project complied with these requirements?

❍ Yes ❍ No

Reviewer Comments:

101) Disability-related services Grantees may not require project residents to participate in disability-related services (this does not include substance abuse treatment services) [578.75(h)]. Has the program complied with this requirement?

❍ Yes ❍ No

Guidance: Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. (Note: CT BOS PSH projects are required to follow Housing First Principles – see below)

Reviewer Comments:

102) Housing First. All permanent projects must follow Housing First principles, including: housing is not contingent on compliance with services; tenants may only be terminated for lease violations or failure to carry out obligations under Connecticut's Landlord and Tenant Act and many only be evicted from their units based on a valid court order; and services are provided post-housing placement to promote housing stability. [CT BoS Policies and Procedures]. Does project follow Housing First principles?

❍ Yes ❍ No

Guidance: HUD Housing First Brief available at:

https://www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/

Reviewer Comments:

103. Confidentiality

A. Procedures. Has the grantee/sub-grantee developed written procedures to ensure: all client records containing identifying information are kept secure and confidential; address of any family violence project will not be made public; address or location of any housing or program participant will not be made public? [578.103(b)] ❍ Yes ❍ No

Reviewer Comments:

B. Releases. Is information sharing evidenced in chart authorized by a current release of information? [578.103(b)] ❍ Yes ❍ No

Reviewer Comments:

104) Educational Assurances: Designated Staff. If the grantee provides housing or services to families, has the grantee designated a staff person to be responsible for ensuring that children

being served are enrolled in school and connected to appropriate services in the community including early childhood programs? [578.23(c)] ❍ Yes ❍ No

Reviewer Comments:

105) Educational Assurances: Policies and Practices. Are the project's policies and practices consistent with the laws related to providing education services to individuals up to 24 years of age and families? [578.23(c)] ❍ Yes ❍ No

Reviewer Comments:

106) Termination of Assistance. Review files of participants who have been terminated from the CoC program. Has the grantee met HUD requirements for terminating assistance (provide formal due process before a person other than the person (or subordinate of that person) who made or approved the termination decision, written copies of rules, written notice of termination with clear statement of reasons for terminating, opportunity to appeal decision, and receiving written notification of final decision)? [578.91]

❍ Yes ❍ No

Reviewer Comments:

107) VAWA. Has the project complied with the Violence Against Women Act (VAWA) , which prohibits eviction or termination of assistance if the grounds for such action is an instance of domestic violence, dating violence, or stalking.

❍ Yes ❍ No

Reviewer Comments:

108) Client Bill of Rights Has the project documented receipt of the CT BOS Client Bill of Rights by all applicants and participants? . [CT BoS Policies and Procedures].

❍ Yes ❍ No

Reviewer Comments:

109) Unit retention –institutional stays Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies (578.51). Has the project complied with this provision? ❍ Yes x No

Reviewer Comments: