

# CT Balance of State CoC *Compliance Training:*

*HUD/CT BOS Requirements  
& Tips for Success*

April 20, 2016

(UPDATED 4/27/16)

## Agenda

- Welcome & Introductions
- National Policy Context
- HUD & CT BOS Requirements
  - Participant Eligibility
  - Income Verification & Rent Calculation
  - Housing Requirements
  - Fiscal Requirements
  - Service Requirements
- Monitoring & Tips for Success
- Helpful Resources



## Why are you here today?

Turn to the person next to you and share.  
If your project were being monitored tomorrow:

- In what areas are you most confident that you would do well?
- Where are you most concerned about findings?



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## Learning Objectives

Participants will:

- Understand the national policies that are driving changes to requirements
- Understand requirements of the *CoC Program Interim Rule* (current regulations)
- Understand responsibilities related to project operation and grant administration
- Understand requirements established by CoC Written Standards (i.e., CT BOS Policies)
- Know how to succeed during monitoring
- Know where to locate additional information



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# National Policy Context

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## Federal Policy Priorities (2015 CoC Registration Notice)

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1. Strategic Resource Allocation
2. Ending Chronic Homelessness
3. Ending Family Homelessness
4. Ending Youth Homelessness
5. Ending Veteran Homelessness
6. Using a Housing First Approach



# HUD & CT BOS Requirements



## COC INTERIM RULE:

[HTTPS://WWW.HUDEXCHANGE.INFO/RESOURCE/2033/HEARTH-COC-PROGRAM-INTERIM-RULE/](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/)

## CT BOS POLICIES:

[HTTP://WWW.CSH.ORG/CSH-SOLUTIONS/COMMUNITY-WORK/HOUSING-DEVELOPMENT-AND-OPERATION/2578-2/](http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/2578-2/)

## HUD Monitoring

### ■ Updated HUD monitoring exhibits available:

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administrative/hudclips/handbooks/cpd/6509.2](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administrative/hudclips/handbooks/cpd/6509.2)

### ■ HUD CT Office planning to start monitoring

### ■ Basic HUD Monitoring Process:

- Notice by letter – grant(s), operating year, selected exhibits to be reviewed
- Visit and Document Review
- Summary Report of Findings and Concerns
- Corrective Action Required for Findings
- CA must be accepted by HUD







# Participant Eligibility

## Overview of Homeless Definition

HUD Category	Type	General Eligibility Guidelines*
Category 1	Literally Homeless	Eligible for PSH, RRH, TH
Category 2	Imminent Risk of Homelessness	Not eligible for any CoC Program assistance in CT BOS
Category 3	Homeless Under other Federal Statutes	Not eligible for any CoC Program assistance in CT BOS
Category 4	Fleeing/Attempting to Flee Domestic Violence	Must also be Category 1 to be eligible for CoC Program assistance in CT BOS

\*Note: important details are contained in following slides – eligibility limits may apply in certain circumstances

## Literally Homeless

- An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
- Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation:
  - car
  - park
  - abandoned building
  - bus or train station
  - airport
  - camping ground



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## Literally Homeless (cont.)

- **Living in a shelter designated to provide temporary living arrangements:**
  - Emergency shelter
  - Transitional housing (not eligible for CT BOS PSH vacancies)
  - Hotels and motels paid for by charitable organizations or federal/state/local government programs
  - *Safe Haven*
- **Exiting an institution (e.g., jail, hospital)**
  - where they resided for less than 90 days
  - AND
  - were residing in emergency shelter or place not meant for human habitation immediately before entering institution



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## HUD Chronic Homelessness Definition – NEW as of 1/2016!

1) Live in a place not meant for human habitation, or an emergency shelter, or a safe haven (People in TH are not CH);

AND

2) Homeless (as defined above) for at least one year continuously or on 4 separate occasions in the last 3 years **(totaling 12 months)**;

AND

3) Disabled as defined by HUD



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## HUD Chronic Homelessness Definition – Continued



- ✓ People residing in an institution <90 days AND who were CH immediately before entering also qualify (stays in institutional care for fewer than 90 days included in the 12-month total, not counted as a break).
- ✓ Families with an adult or minor HoH who meet all criteria above also qualify
- ✓ RRH & GPD participants retain their CH status
- ✓ **Occasion is demarcated by a break of 7 or more consecutive nights** not residing in a place not meant for human habitation, in shelter, or in a safe haven
- ✓ Continuous means without a break of 7 or more consecutive nights

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## Definition of Disability

- Physical, mental or emotional impairment – includes impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury
  - Is expected to be long-continuing or of indefinite duration
  - AND**
  - Substantially impedes the person's ability to live independently
  - AND**
  - Could be improved by more suitable housing
- Developmental Disability
- HIV/AIDS



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## What counts as evidence of disability?

- Written verification from professional
  - ✓ licensed by CT to diagnose and treat the disability
  - ✓ certification that disability meets the HUD definition
- Written verification from the Social Security Administration
- The receipt of a disability check (e.g., SSI/SSDI check or Veteran Disability Compensation);
- Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence described under bullets 1 through 3 above.
- Other documentation approved by HUD



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## CT BOS PSH Prioritization Policy

PSH Projects must prioritize Chronically Homeless people for 100% of available vacancies.



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### CH PSH Eligibility - Recordkeeping Requirements (see handout)

**Evidence of Chronically Homeless Status must include:**

- Evidence of homeless status at time of project entry
- Evidence of meeting continuous or occasions requirements
- Evidence of disability

**AND**

If applicable, evidence that the person was CH immediately before entering an institution or RRH.



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## Timeline for Implementation of New Chronic Homeless Definition

Participants admitted after **January 15, 2016**



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## Am I Chronically Homeless? - Dan

- Dan is seriously mentally ill.
- He lived in a shelter from August 2014 to February 2015.
- He was hospitalized for for 100 days From February 2015 to May 2015
- He returned to Shelter the rest of May 2015.
- He lived with his sister for 2 weeks in June 2015.
- He went back to shelter from June to August 2015.
- Then spent 3 nights in jail and returned to shelter until September 2015.
- He stayed with friends for 3 weeks, then was back in shelter from October 2015 to March 2016.
- Is Dan eligible to enter a CT BOS PSH project in May 2016?



YES

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## Am I Chronically Homeless? - Lisa

- Lisa has a substance use disorder.
- She lived in a shelter from October 2014 to March 2015.
- She lived in a campground from April to August 2015.
- She lived in transitional housing from August to December 2015.
- She has been hospitalized since December 2015.
- Is Lisa eligible to enter a CT BOS PSH project on January 20, 2016?



NO: Lisa was living in TH prior to hospitalization and is not Chronically Homeless.

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## Am I Chronically Homeless? - Drew

- Drew is not disabled, but his son is HIV+.
- They have been living in a shelter since February 2015.
- They have occasionally left the shelter for a few days to stay with friends or family.
- Are they eligible to enter a CT BOS PSH project on March 15, 2016?



NO: Drew is not disabled. A head of household must be disabled for a family to qualify as chronically homeless.

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## Am I Chronically Homeless? - Ellen

- Ellen is disabled by multiple chronic health issues.
- She lived in a shelter from April 2015 until Feb 2016.
- She was hospitalized in Feb 2016.
- Is she eligible to enter a CT BOS PSH project directly from the hospital on March 4, 2016?



YES: Ellen was in shelter prior to being hospitalized and spent fewer than 90 days in the hospital. Her time in the hospital counts toward the 12 month total.

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## Self Certification



- Disability cannot be self-certified.
- For all clients, up to 3 months of homelessness can be documented through self-certification.
- Self-certification of the full 12 months:
  - ✓ *limited to rare and extreme cases*
  - ✓ *may not be used for more than 25 percent of households served by a project during an operating year*
- Documentation of breaks in homelessness between occasions can be entirely based on self-report.

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## What counts as third-party documentation?

- HMIS record?  
YES
- Letter from a shelter or outreach worker?  
YES
- Letter from a friend?  
NO
- Letter from a clergy person?  
YES
- Letter from a doctor?  
YES
- Letter from a counselor or therapist?  
YES

Letters must:

- Be on agency letterhead
- Be signed and dated
- Include name and title of the person signing



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## Documenting Homelessness – Written Intake Procedures

Must maintain & follow written procedures:

- Require intake staff to document
  - At intake, screening for eligibility for ALL persons seeking assistance
  - Evidence relied upon to establish and verify homeless status
- Include standards for documenting due diligence
- Standards must be consistent with HUD's recordkeeping requirements
- COMING SOON: SAMPLE INTAKE POLICY



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## Documenting Homelessness – Written Intake Procedures (cont.)

Standards must establish order of priority for obtaining evidence as:

1. Third-party documentation, examples:
  - ✓ Letter from a shelter
  - ✓ Letter from an outreach team
  - ✓ Letter from another “service provider”
  - ✓ HMIS record
2. Intake worker observation of the conditions where the individual was living
3. Self-certification
  - ✓ must be accompanied by intake worker’s documentation of the living situation and steps taken to obtain third-party documentation (limits apply)



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## Policies for Intake – Things to Remember

Projects must participate in the Coordinated Access Network (CAN).

Projects must follow the CoC’s written standards (i.e., CT BOS Policies) for administering assistance.

Project must have their own policies and procedures for administering assistance.

Intake procedures must include order of priority of obtaining evidence AND prioritization standards for chronically homeless.

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## Rapid Rehousing Eligibility

- Must only serve households coming from shelter or unsheltered.
- Must have annual income of less than or equal to 50% Area Median Income (AMI) initially and less than or equal to 30% AMI at each 90 day re-evaluation.



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## Rapid Rehousing – Other Requirements



- Case management must be provided not less than once per month
- Participants may receive rental assistance of no more than:
  - \$2500 for the initial 3 month period
  - \$2000 for months 4 to 6
  - \$1500 for months 7 to 9
  - \$1000 for months 10 to 12
  - Security deposits are excluded from these limits

*See CT BOS Policies and Procedures for complete RRH written standards*

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## Transitional Housing Requirements

- Applicants must be screened for diversion and admitted only if no other options are available.
- Participants must come from emergency shelter (ES) and unsheltered locations.
- Can serve those from institutional care facility (jail, substance abuse or mental health treatment facility, hospital) for less than 90 days AND who were in ES or unsheltered location immediately before entering that facility.
- Must have income below 30% of AMI.
- May remain in TH for up to 24 months (or longer if necessary to facilitate the movement into PH).

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## Veterans



### **PSH Projects that serve 100% Veterans:**

- ✓ If unable to locate a CH Veteran to fill a vacancy, document due diligence & house the Veteran who has been homeless the longest and has the most intensive service needs.

### **PSH Veterans projects that do not serve 100% Veterans:**

- ✓ If unable to locate a chronically homeless Veteran to fill a vacancy, house a chronically homeless non-Veteran.

### **Veterans ineligible for VA housing & services:**

- ✓ Are prioritized for CT BOS CoC funded projects.

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## Eligibility - Resources



- Participant Disability Verification Form
- Participant Homelessness Verification Form
- Sample Third Party Letters
- Chronic Homelessness Eligibility Checklist
- Sample Written Intake Procedures (Coming Soon)

Available at:

<http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/2578-2/>

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## Equal Access to HUD Programs

- Programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status
- “Any group of people that present together for assistance and identify themselves as a family are considered to be a family and must be served together as such.”
- Families cannot be separated because of age or gender of household members
- HUD prohibits inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing
- Services for transgendered individuals correspond to the person’s identified gender
- Projects must take reasonable steps to address safety and privacy concerns



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# Income Verification & Rent Calculation



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## Rental Assistance – Participant Rent



**Program Participant Contributions Are Required for Rental Assistance  
(except Rapid Re-housing, which must follow CT BOS Policy)**

- Rent must be charged and may not exceed the highest of:
  - 30 percent of the family's monthly adjusted income;
  - 10 percent of the family's monthly income; or
  - The portion of the family's welfare assistance, if any, that is designated for housing costs.
- No minimum rents permitted

## Utilities – Rental Assistance

If tenant pays separately for utilities:



## Leasing – Participant Rent



Program participants in housing assisted with leasing funds may be required to pay an occupancy charge.

- If occupancy charges are imposed, they may not exceed the highest of:
  - 30 percent of the family's monthly adjusted income;
  - 10 percent of the family's monthly gross income; or
  - The portion of the family's welfare assistance, if any, that is designated for housing costs.
- No minimum rents permitted

## Mandatory Annual Income Deductions

- \$480 for each dependent
- \$400 for any elderly or disabled family member (includes single adult). All PSH tenants should receive.
- Reasonable child care expenses to enable work or education
- If elderly or disabled, the sum of the following minus 3% of annual income:
  - Unreimbursed medical expenses
  - Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each disabled member to the extent necessary to enable any family member to work (deduction cannot exceed earned income)



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## Income Review & Documentation

- Must examine income initially and at least annually.
- Must include all household members.
- Adjustments to participant contribution toward rent must be made as changes in income are identified.
- Participant must agree to supply the information or documentation necessary to verify the program participant's income.
- Retain proof of income in participant files.



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## Rent Calculation – Jane & Lian

Jane & Lian have been living together in PSH for 6 months. Jane is disabled and gets SSDI. She also does some babysitting for a neighbor. Lian was unemployed and recently began working. Her hours fluctuate.

- When should you conduct an income review?
- How should you handle the fluctuations?
- Should you include Jane's SSDI income? Babysitting income?
- What deductions might they be eligible for?
- What documentation should you include in the file?



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## Housing Requirements

MUST BE COMPLETED PRIOR TO USE OF COC FUNDS

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## Housing Quality Inspections

- Inspection required prior to occupancy for housing assisted through rental assistance or leasing
- Re-inspection required annually
- CT BOS recommends housing not required to be inspected using HQS be inspected for habitability prior to occupancy and re-inspected at least annually
- HUD Housing Quality Standards Checklist  
<http://portal.hud.gov/hudportal/documents/huddoc?id=52580.pdf>



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## Lead-based Paint

- Applies to all assisted units constructed prior to 1978 and if there will be a child under 6 years of age or a pregnant woman residing in the unit
- Units must be inspected to identify deteriorated paint ( i.e., chipping, cracking, chalking, damaged, separated from substrate).
- Staff conducting inspections should complete web-based training
- Document participant receipt of Lead Hazard Information Pamphlet
- TBRA must share data with local health department
- For more information see:  
<http://www.hud.gov/offices/lead/training/visualassessment/h00100.cfm>



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## Rent Reasonableness

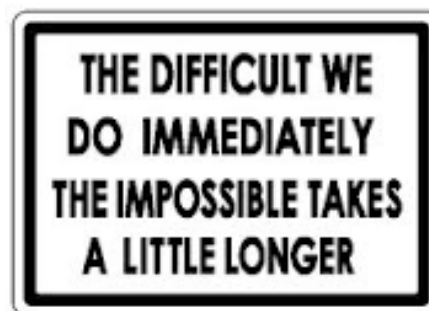


- Required for units assisted with leasing or rental assistance funds:
- May not exceed rents currently being charged by the same owner for comparable unassisted space:
  - ✓ Units assisted with rental assistance funds can exceed FMR within available project budget
  - ✓ Units assisted with **leasing funds cannot exceed FMR**
- Must determine whether the rent charged is reasonable, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit.
- Document 3 comparable units
- Sample "Rent Reasonableness Checklist and Certification" form: [www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc](http://www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc)

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## Rent Reasonableness – Examples from the Field

Can you share an example of how your program used rent reasonableness to rent above FMR and to secure a unit for a hard to house participant?



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## Conflicts of Interest

- Prohibits financial interests/benefit from assisted activity during tenure with organization and one year following tenure. Applies to:
  - ✓ Staff
  - ✓ Person with whom a staff member has immediate family or business ties
  - ✓ Board
  - ✓ Consultants
- Examples:
  - ✓ May not lease units/structures owned by the recipient, subrecipient, their parent organization(s), a staff or board member relative, or business associate
  - ✓ Owner of a unit or his/her subordinate may not conduct HQS, rent reasonableness, or lead-based paint visual inspection.



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## Leases & Occupancy agreements

- Permanent housing must have an initial one year agreement;
- 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.
- Agreement/lease should provide formal due process rights.



Sample Lease and  
Sub-lease

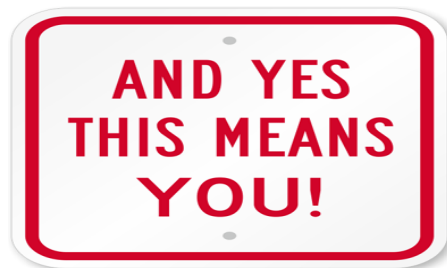


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## Environmental Review (ER)



**All CoC projects are required to complete an ER**



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## Environmental Review (ER)



- Assesses the potential environmental impacts of a project
- If ER not present, HUD can issue a finding
- ER documentation required for current units & new housing units coming on-line.
- Contact the community development officials in your community who can help you with inspectors and/or responsible entities
- See handout on ER Instructions for more information
- Contact CT BOS team with any questions: [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)

### Resources:

- <https://www.hudexchange.info/environmental-review/>

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# Overview of Fiscal Requirements

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## Program Income

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- Program income: income received by the recipient or subrecipient that is directly generated by a grant-supported activity
  - ✓ Example: Rent in a leasing project
- Program income must be used for eligible expenses.
- Program income from rent and occupancy charges in transitional housing can be used to assist residents moving to permanent housing.
- Program income can be counted as match for FY15 & FY16 awards.
- Recipients and subrecipients may **not** charge program participants program fees.

Eligible Costs	Approved Costs
All costs included in the CoC Program interim rule	• Each project has approved budget line items
	• Recipients may only spend CoC Program funds on approved costs
	• HUD approval is required to amend the budget to spend money on CoC Program eligible costs other than those that were included in the project budget approved through the application process

## Determining Costs

Costs are only eligible if they are:

- Associated with a HUD-eligible client
- One of the SNAPS eligible activities
- Delineated in the Technical Submission and the approved budget
- Documented
- Reasonable, allowable and allocable



## Determining Cost Eligibility

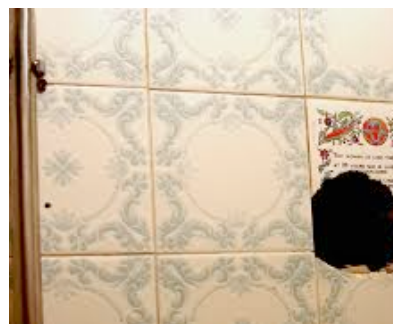
- ✓ If properly procured, cost is reasonable
- ✓ If on approved budget, cost is allowable
- ✓ If directly linked to grant, cost is allocable



If costs are reasonable, allowable and allocable...they are eligible for federal reimbursement

## Eligible Costs – Rental Assistance

- Can pay up to 100% of the rent (if participant has no income)
- May also be used for:
  - ✓ Security deposit (up to 2 months)
  - ✓ First and last month's rent
  - ✓ Damages (not to exceed one month's rent)
  - ✓ Administering Rental Assistance (HQS inspections, rent calculation, rent reasonableness)





## Eligible Costs – Rental Assistance

- Assistance may continue:
  - ✓ A maximum of 30 days from the end of the month in which the unit was vacated, unless unit is occupied by another eligible person.
  - ✓ When a participant is staying in an institution for less than 90 days.
- If the qualifying household member has died or been institutionalized for more than 90 days, assistance may continue until lease expiration.



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## Eligible Costs - Leasing

- Can pay up to 100% of the rent (regardless of participant income)
- May also be used for:
  - ✓ Security deposit (up to 2 months)
  - ✓ First and last month's rent
  - ✓ Damages (not to exceed one month's rent)
  - ✓ Administering Rental Assistance (HQS inspections, rent calculation, rent reasonableness)



"Leasing vs. Rental Assistance: Determining How to Classify Your Project on the GIW" at: <http://www.hudhre.info/index.cfm?do=viewResource&ResourceID=4685>

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## Eligible Costs - Utilities

- Utilities (electric, gas, water) are a leasing cost, if included in the rent.
- Utilities are an operating cost, if utilities are not included in the lease (not applicable to rental assistance).
- Utilities are a supportive service cost, if the structure is used as a supportive service facility.



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## Eligible Costs - Operating

Costs associated with “day-to-day physical operation of housing in which homeless persons are housed”:

- ✓ Maintenance and repair
- ✓ Building security
- ✓ Electricity, gas & water
- ✓ Furniture
- ✓ Equipment
- ✓ Staff and overhead costs related to carry out these activities



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## Ineligible Costs - Operating

Costs not included in your approved budget

Grant may not fund:

- ✓ Rental assistance and Operating in the same unit/ structure
- ✓ Maintenance and repair costs included in the lease
- ✓ Food (eligible under supportive service)



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## Eligible Costs – Supportive Services

**Address the needs of the program participants to help obtain and maintain housing:**

Annual assessment	Employment assistance/job training	Mental health
Moving	Food	Outpatient health
Case Management	Housing Search/counseling	Outreach
Child Care	Legal Services	Substance abuse treatment
Education	Life Skills Training	Transportation
Utility deposits	<u>Any unlisted cost is ineligible.</u>	

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## Ineligible Costs – Supportive Services

- Costs not included in your approved budget
- Staff training and the costs of obtaining professional licenses or certifications - training on the CoC Program only is an eligible cost under project administration.
- Gift Cards
- Car repairs or maintenance on behalf of participant:
  - ✓ if public transportation is insufficient in the area
  - ✓ that exceed 10% of Blue Book value



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## Eligible Costs – Project Administration

General management, oversight, and coordination:

- ✓ Preparing program budgets and schedules
- ✓ Developing compliance systems
- ✓ Monitoring compliance
- ✓ Developing agreements with subrecipients and contractors
- ✓ Preparing reports and documents for HUD
- ✓ Coordinating audit and monitoring findings resolution
- ✓ Evaluating the program against state objectives
- ✓ Managing/supervising the functions above
- ✓ Third party contracts: Legal, accounting, and audit services
- ✓ Rental or purchase of equipment, insurance, utilities, office supplies, rental/maintenance of office space



## Eligible Costs – Project Administration

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- Training on CoC requirements and attending HUD-sponsored CoC trainings
- Environmental review



## Ineligible Costs – Project Administration

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- Staff and overhead costs directly related to carrying out operating, leasing, rental assistance, and support services activities are eligible under those activities not admin.

EXAMPLES:

- HQS Inspections
- Rent Reasonableness Determinations
- Supervision of Property Management and Social Services Staff

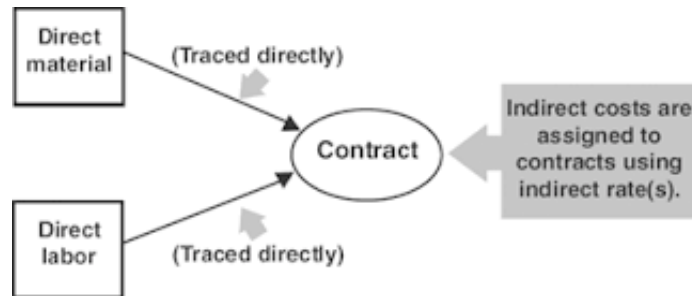
**DENIED**

## Direct vs. Indirect Costs

**Direct costs** are associated with a particular cost objective or award that can be directly assigned to such activities relatively easily and with a high degree of accuracy.

**Indirect costs** are incurred for common or joint objectives and cannot be readily associated with a particular cost objective

To charge indirect costs, agency must have an indirect cost rate proposal that is in accordance with OMB Circulars A-87 or A-122, as applicable.



## Administrative vs. Indirect Costs

- Eligible admin costs are defined in the CoC Program Interim rule (see slides 64-65); costs not listed are not eligible
- Overhead costs that are not eligible as admin costs MAY be eligible as indirect costs if:
  - ✓ Agency has an indirect cost rate proposal that is in accordance with federal requirements
  - ✓ Cost is indirectly related to carrying out operating, leasing, rental assistance, or supportive services activities



## What type of expense is this?

Staff salary for conducting HQS inspections

- ✓ Rental Assistance

Benefits for case management supervisor

- ✓ Supportive Services

Staff salary and travel costs to attend today's training

- ✓ Administrative

Staff salary to compile the APR

- ✓ Administrative

Costs associated with payroll management

- ✓ Indirect

Salaries for IT staff who maintain the agency's network

- ✓ Indirect

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## Documenting Time

- Timesheets suffice for employees who work in a single indirect cost activity (e.g. accounting)
- Timesheets, with periodic certifications, suffice for employees who work on a single federal award category (e.g. supportive services)
- For employees who work on more than one activity, direct and/or indirect, timesheets must be supported by personnel activity sheets
- Time sheets must reconcile to activity logs (e.g., case notes for service staff, maintenance logs for operations staff)

Source: OMB  
Circulars A-87,  
A-110 and A-122

## Procurement Overview

Procurement policies must be in place

Must follow written procedures and document compliance

Four procurement methods available

- Small purchase
- Sealed bid
- Request for proposals (RFP)
- Non-competitive



## Most Common for CoC Projects: Small Purchase

May be used for purchases below \$150,000

Requirements include

- Getting 3 to 5 competitive quotes
- Selecting the most reasonable offer
- Using purchase orders or petty cash to purchase





## Review

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How long can you continue to pay rent when someone is incarcerated?

- 89 days or until the end of the lease for families

What is the maximum eligible security deposit amount?

- Up to 2 months' rent

Is requiring participants to pay a monthly amount towards savings allowable?

- No. Participants cannot be required to pay any amount that exceeds the allowable charges for rent/occupancy fees.

Is a gift card to help participants with no income to purchase groceries an eligible expense?

- No.



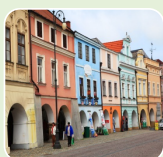
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## Service Requirements

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## Housing First



Quick, low barrier access to housing while providing needed services



Housing is not contingent on compliance with services; Services are voluntary for tenants, not staff – assertive engagement



Same expectations as anyone else in housing as established in lease.



Services are wrapped around the individual  
Person is assisted to meet lease obligations

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## CT BOS Housing First Requirements

**All projects (Permanent Supportive Housing Rapid Re-Housing, and Transitional Housing) are required to adopt the CT BOS Housing First Principles.**

(See CT BOS Policies)



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## Termination of Assistance

Must be consistent with Housing First Principles

Must provide formal due process:

- Written copy of program rules
- Written notice of reason for termination
- Review of the decision
- Written notice of the final decision



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## Assessment & Service Planning



- Must conduct assessment of participants' supportive services needs, the availability of such services, and the coordination of services to ensure long-term housing stability **at least annually**.
- Services must be adjusted accordingly
- Assessment should be dated and documented in participant files
- Sample assessment and service plan available at:  
<http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/assuring-quality-in-connecticut>

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## Assessment & Service Planning



- Evidence that supportive services are available to meet the needs of participants documented in participant files:
  - ✓ Documentation of service delivery (e.g. case notes) reconciles with time sheets
  - ✓ Services are provided with a frequency that is responsive to participant needs
  - ✓ Evidence of appropriate and timely intervention on identified issues that threaten housing stability or health/wellbeing
  - ✓ Evidence that contact/attempts occur at least 2 times per month & contact/attempts that are less frequent are supported by an assessment indicating a lower level of service need
  - ✓ Service plans/case notes consistent with Housing First Principles

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## Educational Rights



Applies to Children >18 and young adults 18-24

Grantees required to:

- Inform homeless families and youth of their rights under McKinney-Vento Education Services
- Help children and young adults to enroll in school immediately
- Advocate for ability to attend school of origin while homeless and until end of academic year once housed
- Advocate to ensure students receive services to which they are entitled, including assistance from the school district's homeless liaison
- Have a staff person assigned as educational liaison to assist
- **Adopt CT BOS sample policy or similar policy (see CT BOS Policies)**

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## True or False?

There are no rules in a Housing First program?

FALSE – lease defines rules

Participants in permanent housing cannot be evicted outside of the legal housing court process?

TRUE – must evict through court

Adoption of the CT BOS Housing Principles is optional for Transitional Housing programs?

FALSE – required for all programs

Assessment is only required at intake

FALSE – required annually

Educational rights apply only to projects serving families

FALSE – applies to children and young adults 18-24



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## Monitoring



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## HUD Monitoring Areas

Beneficiaries	Housing	Supportive Services	Project Progress
Match Documentation	Subrecipient Management	Overall Systems Management	Financial Management
Cost Allowability	Procurement	Equipment and Equipment Disposition	Other Federal Requirements

## Tips for Success

- Use resources provided on handout
- Be familiar with HUD Monitoring Exhibits
- Include supervisory review of eligibility documentation as a standard intake process
- Use HUD CPD Income Calculator - Select HOPWA  
<https://www.hudexchange.info/resource/2079/cpd-income-eligibility-calculator/>
- Review files for compliance at least annually
- Do not over commit match
- Use cash match whenever possible





## CT BOS Team

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## Additional Information

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## Program Components

### Permanent Housing (PH)

- Permanent Supportive Housing (PSH)
- Rapid Re-housing (RRH)

### Transitional Housing (TH)

### HMIS

*Homelessness Prevention*

*Supportive Services Only (SSO)*



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## Permanent Housing



### Permanent Supportive Housing

- Long-term housing assistance where supportive services are provided to assist homeless persons with a disability to live independently.
- Assistance can **only** be provided to individuals with disabilities and families in which one adult **or** child has a disability. Chronic beds require disabled head of household.

### Rapid Re-housing

- Short- or medium-term housing assistance and supportive services are provided to assist homeless persons obtain and maintain stability in permanent housing.
- Rental assistance for a household is limited to no more than 24 months.
- Must follow CT BOS policies for RRH assistance.

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## Transitional Housing

- Facilitates the movement of homeless individuals and families to permanent housing within 24 months.
- May remain in TH for up to 24 months or a longer period if necessary to facilitate the movement into PH.
- HUD may discontinue assistance for TH projects if more than half of the individuals or families remain in the project for more than 24 months.



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## Chronic PSH Prioritization



**PSH Projects must prioritize Chronically Homeless people for 100% of available vacancies.**

Must document that order of priority standards have been incorporated into intake procedures and that recipient is following them (in coordination with the CAN) when accepting new program participants:

- **First**—Chronically Homeless w/the Longest History of Homelessness & Most Severe Service Needs
- **Second** - Chronically Homeless w/the Longest History of Homelessness
- *Third*—Chronically Homeless w/the Most Severe Service Needs
- *Fourth*—All Other Chronically Homeless Individuals & Families.

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## Transferring from PSH to PSH/Portability



- Existing PSH participants being transferred from a different CTBOS PSH project are **exempt** from the order of priority\*
- Transfers must be coordinated and approved by local CAN(s)
- Resulting vacancy filled using the order of priority\*
- PSH units must be prioritized for eligible applicants residing in the CT BOS area over eligible applicants residing in another CoC.
- Participants in tenant-based rental assistance can move anywhere within the CT BOS CoC (may be limited by service availability unless limit would present DV risk).

\*established in HUD Notice CPD-14-012

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## Fair Housing – New as of 4/4/16



- Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status or national origin.
- Violations of the Fair Housing Act occur when policy or practice has an unjustified discriminatory effect, even when the provider had no intent to discriminate.
- Where a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on individuals of a particular race, national origin, or other protected class, such policy or practice is unlawful.

See: [http://portal.hud.gov/hudportal/documents/huddoc?id=HUD\\_OGCGuidAppFHASandCR.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHASandCR.pdf)

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## Fair Housing - Tips



### **Applies to CoC funded projects and private market landlords:**

- Retain all application records, including outcome and reason for denial
- Terminate any blanket policy against renting to persons with criminal records
- Use individualized and detailed assessments of criminal records
- Consider only convictions
- Ensure that any policy actually assists in ensuring the security of residents and property, and that you are able to demonstrate as such
- Ensure that any policy concerning a tenant's criminal record is absolutely necessary, and that no less discriminatory alternative is available

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## CT BOS Client Bill of Rights – Pending Approval by Steering Committee

- Establishes basic rights for participants in areas including:
  - ✓ Fair Housing/Equal Access
  - ✓ Respectful treatment
  - ✓ Transparent services
  - ✓ Confidentiality
  - ✓ Grievances
  - ✓ Voluntary services
- Provides information about what a client who believes rights have been violated can do
- Must be signed by all participants and maintained in participant file



Available in CT BOS Policies at:

<http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/2578-2/>

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## CT BOS Housing First Principles

### Low Barrier Approach to Entry

- Regardless of substance use, medication compliance
- Services not mandated
- Treatment completion not required
- Regardless of income, credit, rental history
- May consider serious criminal convictions on case-by-case basis only to ensure safety
- Generally, only apply admission criteria required by funders

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## CT BOS Housing First Principles

### Community Integration & Recovery

- Located in neighborhoods accessible to resources and services
- Looks & feels like other housing
- Help to build relationships, engage in meaningful activities, regain/develop role in family/community
- Recovery-based: tenants gain control, define personal vision/values/preferences/goals

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## CT BOS Housing First Principles

Lease  
compliance &  
housing  
retention

- Standard lease agreement
- Services support lease compliance
- No rules except those that are customary, legal, enforceable
- Housing retention contingent only on lease compliance
- TH: must offer due process to resolve issues prior to termination (unless immediate risk)
- PH: required to use legal court eviction process

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## CT BOS Housing First Principles

Separation of  
Housing &  
Services

- Property management & services provided by separate legal entities or distinct staff
- Defined processes to communicate/coordinate to support stable tenancy
- Protect client confidentiality: "Need to Know"

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## Housing First Principles – Separation of Functions



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## CT BOS Housing First Principles

Tenant Choice

- Frequency, timing, location, intensity of services
- Neighborhood, apartment, furniture, decor
- Accept choices without judgment
- Accept and help to reduce risk
- No coercion
- Clinical and legal limits to choice
- Tenant input into program design, activities, policies

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## Match Requirements

### Matching Funds



- Match requirement - 25% cash or in kind for all line items except leasing
- Match is provided to the CoC Program grant - **not** to a budget line item
- Matching funds can only be used on eligible CoC Program costs
- Example: \$100,000 of operating funds may be matched with \$25,000 cash that is expended on eligible supportive services or with \$25,000 worth of in-kind eligible supportive services

## Understanding Match

- The total match requirement can be met through **cash, in-kind, or a combination** of the two.
- Funds must come to and be disbursed by the grantee.
- Full match amount committed in the application must be met
  - ✓ HUD monitors based on that amount.
  - ✓ Use match that exceeds the minimum requirement as leverage



## What Is Not Match?

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- X Participant income (e.g. public benefits)
- X Participant savings
- X Program income (e.g. tenant rent payment)
- X Cash or any in kind contribution used as match for another grant.

## Documenting Cash Match

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- Must show that the funds were recorded on the agency books during the operating year.
- Must show that the funds were expended on eligible expenses during the operating year.





## Documenting In-Kind Cash Match

- Must keep and make available, for inspection, **records documenting the service hours provided.**
- Must keep source documentation (e.g., MOU) on file
- Requirements for the MOU:
  - Must establish the unconditional commitment
  - The specific service to be provided
  - The profession of the persons providing the service,
  - The hourly cost of the service to be provided.
  - Must be valued at rates consistent with those ordinarily paid



## Leverage

- Must be above and beyond match. EXAMPLE: \$100,000 renewal grant must show \$25,000 in match PLUS \$150,000 in leveraging.
- Any public or private financial assistance can be counted as cash leverage as long as it is used for program related costs (not restricted to eligible costs)
- Services (counseling, legal advocacy, etc.) and physical goods (food, furniture, clothing, etc.) can be counted as in-kind leverage.
- Must be documented in writing and dated within 60 days preceding the CoC Application deadline (or as defined in NOFA).
- HUD expects the amount(s) listed in the project application to be accurate, and documents in a commitment letter.



## Eligible Costs – Supportive Services

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If the supportive services are provided in a facility not contained in a housing structure, the costs of day-to-day operation of the service facility are eligible:

- ✓ maintenance & repair
- ✓ building security
- ✓ furniture
- ✓ utilities
- ✓ equipment



If supportive services are provided directly by recipient/subrecipient, salary and benefits or supplies and materials for providing supportive services are eligible.

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## GRANT AMENDMENTS & OTHER CHANGES

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## What is a Significant Change?

CoCs with more than one recipient

- Change of recipient
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project
- A shift of over 10% of the total amount awarded for one eligible activity to another activity
- A reduction in the number of units
- A change in the subpopulation served

modify LOCCS.

## How To Make a Significant Change

For significant changes:

- Prepare a detailed, written request to the HUD Field Office
- Explain the reason for the change
- Justify same or better level of service
- Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)



## How To Make a Minor Change

For minor changes, the recipient must:

- Fully document any changes
- Maintain documentation and make it available to HUD during on-site reviews or upon request

It is advisable to alert the Field Office of the change.



## Other Administrative Requirements

- Drawdown at least quarterly
- Submit APR within 90 days of grant expiration



## Which of these requires a grant amendment?

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- Conversion from leasing to rental assistance? GRANT AMENDMENT REQUIRED
- Transfer of the grant to a different recipient? GRANT AMENDMENT REQUIRED
- Change the subrecipient? MINOR CHANGE – AMENDMENT NOT REQUIRED
- Reduce under spending by moving unspent rental assistance funds to supportive services? DEPENDS: IF YOU ALREADY HAVE AN APPROVED SUPPORTIVE SERVICES BUDGET AND THE SHIFT IS 10% OR LESS THAN TOTAL AMOUNT AWARDED, THEN NO AMENDMENT IS REQUIRED
- Change target population from HIV to SMI? GRANT AMENDMENT REQUIRED