**Participant Chart Monitoring Preparation Guidance**

*Updated 03/11/19*

**Charts for participants served in a HUD CoC funded program must include:**

1. **Documentation of Eligibility** 
   1. Documentation of Homelessness
   2. Documentation of Disability - required for Permanent Supportive Housing (PSH)

Homeless Verification and Disability Verification forms can be found here: [http://www.ctbos.org/resources](http://www.ctbos.org/resources/)/

Additional forms and guidance available at:

<http://www.ctbos.org/wp-content/uploads/2017/04/CT-CoC-Eligibilility-Verification-Resources-Compiled-2017.10.30.pdf>

Documentation must demonstrate homelessness at project entry (i.e., the date on which the applicant accepts an available spot in the project – project entry may precede the date housed)

1. **Current Lease or Occupancy Agreement** – Retention of a copy of the signed lease or occupancy agreement is required for PSH, Transitional Housing (TH), and Rapid Re-housing (RRH). Leases/agreements must be consistent with Housing First and include an addendum outlining VAWA protections. Agreement/lease should provide formal due process rights. For PSH, leases must be for an initial one-year term renewable for a minimum term of 1 month and terminable only for cause. For rental assistance projects, leases must be between the program participant and the landowner or sublessor. For leasing projects, leases must be between the recipient or subrecipient of CoC funds and the landowner.
2. **Income** **and Rent/Occupancy Charge Information**– If grantee imposes occupancy charges:
   1. Income for all household members must be calculated at least annually and updated upon change in accordance with 24 CFR 5.609 and 5.611.
   2. Supporting documentation of income (e.g. pay stubs or copy of disability check) and allowable deducted expenses (e.g., unreimbursed medical, child care) must be maintained in file.
   3. Occupancy/rent charged may not be greater than 30% of family’s adjusted income or 10% of gross income.

*Recommended that PSH/TH projects use DMHAS rent calculation spreadsheet, which can be found here:* [*http://www.ctbos.org/wp-admin/post.php?post=4698&action=edit#.*](http://www.ctbos.org/wp-admin/post.php?post=4698&action=edit%23.)

1. **Housing Inspections** - Housing Quality Standards required for PSH, TH, and RRH assisted through CoC leasing or rental assistance. Units must be inspected prior to occupancy and re-inspected at least annually. Form can be found here: <http://portal.hud.gov/hudportal/documents/huddoc?id=52580.pdf>
2. **Rent Reasonableness Determination -** Required for PSH, TH, and RRH assisted through CoC leasing or rental assistance. Must include 3 comparable units. Complete prior to initial rental and as part of annual recertification.

Sample “Rent Reasonableness Checklist and Certification” form available at: <https://www.hudexchange.info/resources/documents/RentReasonableChecklist.pdf>

1. **Lead based paint-** Must conduct 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. Participant files must document completion of the assessment in HQS and receipt of the Lead Hazard Information pamphlet, which can be found at: <https://www.hud.gov/program_offices/healthy_homes/enforcement/disclosure>. For staff completing the visual assessment maintain documentation of completion of the related HUD web-based training available at:

[*https://apps.hud.gov/offices/lead/training/visualassessment/h00300.htm*](https://apps.hud.gov/offices/lead/training/visualassessment/h00300.htm)

1. **Termination of Assistance** –Applies to files of participants who have been terminated/discharged from the CoC program. Must demonstrate participant was notified of formal due process and provided a written copy of rules, written notice of termination with clear statement of reasons for terminating, opportunity to appeal decision, and right to receive written notification of final decision. This notification should be provided for all non-deceased participants exiting the project, regardless of whether the exit is voluntary or involuntary. Send the notification to the last known address, if current address is unknown. CT BOS also requires that, if the participant is at-risk of a return to homelessness, the project notifies the CAN so that they CAN may convene a case conference and determine any additional interventions that may be offered to prevent homelessness.
2. **On-going assessment of supportive services needs -** Evidence that the grantee conducted on-going assessments of participant’s supportive service needs including services needed, their availability, and the coordination of services to ensure long-term housing stability at least annually. (CT BOS recommends and DMHAS requires a needs assessment at least every 6 months). Sample assessment available at: <https://www.csh.org/resources/intakeassessment-form-sample/>
3. **Home Visits\*** – Documentation that staff meets with participants in their apartments at a frequency that is responsive to participant needs and least every six months.
4. **Service Plans\*** - Documentation that service plans are completed within 60 days of project entry, are updated at least every 6 months and are signed by the direct service staff person, the participant and a supervisor; plans include specific and measurable action steps and indicate who is responsible for each action and when actions will occur; goals are individualized and person-centered. Case notes document that assistance with advancing goals/objectives is regularly provided to participants. Service Plans should be consistent with Housing First. Supportive Housing Case Management Tools (including service planning forms) available at:

<https://www.csh.org/qualitytoolkit/>.

1. **Provisions of Services -** Evidence (e.g. case notes) thatthe grantee made supportive services available to meet the needs of program participants, making regular attempts, using a variety of contact methods\* to engage clients. Must include evidence of provision of case management services at least monthly for RRH. For other types of projects, frequency of services should be commensurate with participant needs and, typically, not be less frequent than every 2 weeks. Case notes and other documentation should be consistent with Housing First.
2. **Releases -** Information sharing evidenced in charts is authorized by a current release of information signed by the participant. Unless the chart documents that participant has declined authorization to enter information into HMIS, all charts should include a current HMIS release.
3. **Participant/Applicant Bill of Rights-** All participants/applicants should sign the Bill of Rights to indicate that they received a copy of the form and that someone helped them to review. Form available at: <http://www.ctbos.org/wp-content/uploads/2017/04/CT-BOS-Client-Bill-of-Rights-Adopted-4-22-2016.docx>
4. **Application Records -** Retain all application records, including outcome and reason for denial.
5. **VAWA –** Retain evidence that you provided the Notice of Occupancy Rights (must be provided when individuals are applying for PH and TH) and Incident Certification Form to each adult tenant and applicant. Both forms must also be provided at each of the following times: a) when a household is denied PSH, RRH or TH; b) when a program participant is admitted to PSH, RRH or TH; c) when a program participant receives notification of eviction; and d) when a program participant is notified of termination of assistance. Retain records for all emergency transfer requests and outcomes. Forms HUD 5380 and HUD 5381 available at: <https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a>
6. **Moving-on from PSH\*** - Evidence that project assesses participants who have stabilized in housing for interest in and provides assistance with moving-on.

**DMHAS CoC RA additional requirements**

1. **Owner Assurances and HAP Contract** –HAP contract and Owner’s Assurances forms must also be executed at lease signing.
2. **Health and Safety Checklist**– In addition to HQS, document annual completion of the Health and Safety Checklist approximately six months following completion of HQS. This results in 2 inspections annually (1 HQS and one using the Health and Safety Checklist) at approximately 6-month intervals. Form available at: <http://www.ctbos.org/wp-content/uploads/2019/01/General-Health-and-Safety-Checklist_Final-Updated-2018.12.19.doc>
3. **Annual Recertification Letter** – Documentation that an annual recertification letter was sent to the participant 20-90 days before the effective date of the recertification.
4. **Notification of Termination Risk** – Documentation that prior to commencing a subsidy termination, the participant was notified in writing that subsidy is in jeopardy.