



Connecticut Balance of State Continuum of Care

Ending Homelessness in Connecticut | Email: ctboscoc@gmail.com | Website: www.ctbos.org

CT Balance of State (CT BOS) Continuum of Care (CoC) *Policy and Administrative Requirements*

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Agenda



- Welcome & Introductions
- Overview of Federal and Local Requirements
- Equity & Equal Access
- Additional Required Policies
- Data Related Requirements
- Other Administrative Requirements
- Final Suggestions & Questions
- Additional Resources

Break Out Rooms: Ice Breaker

Introduce yourself

- Name
- Agency
- Title
- How long have you been working at this agency?

What are you most looking forward to this Spring/Summer?





Overview: Federal & Local Requirements

Federal Requirements



- [CoC Program Interim Rule](#)
- [Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards](#)
- [HUD CoC Program Notices](#)
- [HUD CoC Program NOFA](#)
- [HUD CoC FAQs](#)
- [YHDP HUD Resources for Youth Service Providers](#)

Local Requirements

- [CT BOS Policies](#)
- [CT CAN Policies](#)
- [DOH CT RRH Operations Guide](#)
- [DMHAS CoC Rental Assistance Operations Guide](#)
- [CT BOS YHDP Requirements](#)



Forms on CT BOS Website

- DMHAS CoC Rental Assistance Documents
- DOH Rapid Rehousing Documents
- Eligibility tools
- Environmental Review Documents
- And more!



CoC Monitoring Guide - No Surprises!

- Compiles requirements into one document
- Includes criteria used during monitoring
- Cites regulations, notices, and policies
- Includes links to resources



Participant Chart Documentation Requirements by Project Type

Indicates which documents should be in CoC Program Participants' charts for:

- Permanent Supportive Housing
- Rapid Rehousing: includes DV Bonus, YHDP RRH and YHDP Diversion/Rapid Exit
- Transitional Housing: includes YHDP Crisis Housing
- YHDP Youth Navigator
- Links to required forms, sample forms and other guidance
- REMINDER: Retain all documents for a minimum of 5 years. Maintain participant eligibility documentation for 5 years after the end date of the last grant operating year during which a participant was served.



Key Terms



Recipient:

The agency that enters into a grant agreement with and receives CoC funds from HUD. Can be DMHAS, DOH, a Public Housing Authority, or a non-profit agency

Subrecipient:

An agency that is listed on the project application as a subrecipient and receives CoC funds through a subaward from the recipient. All subrecipients in CT BOS are non-profit agencies.

Equity & Equal Access



Participation by Homeless People

Each grantee and sub-grantee must:

- Have at least one homeless or formerly homeless person on the board of directors or equivalent policy making entity
 - Advisory Committees are not a suitable substitution
- To the maximum extent practicable involve homeless people through employment, volunteer services or other means in maintaining, operating, and providing supportive services.



New: Race Equity and Consumer Involvement (Best Practice)



- Recruiting, retaining and promoting people with lived experience of homelessness (PWLEH) and people who identify as BIPOC and LGBTQIA+ in staff and Board positions
- Creating and maintaining an inclusive organizational culture that promotes equity
- Engaging PWLEH in meaningful opportunities to shape homeless services programs
- Reviewing consumer survey results and taking action accordingly

New: Race Equity and Consumer Involvement (2) (Best Practice)

- Developing partnerships with local organizations that focus on work with marginalized populations
- Analyzing who gets access to your agency's homeless services programs and program outcomes by race/ethnicity/sexual orientation/gender identity to determine if access and/or outcomes are disparate
- Planning and or implementation of steps to address any disparate access and/or outcomes



New: Race Equity and Consumer Involvement (3)



For agencies that have not taken actions in the past 12 months to advance at least 3 of the items, via monitoring:

- Briefly describe specific actions your agency plans to take over the next 12 months.
- Include a target date.



New in 2022 – LGBTQIA+ Policy

Provide a safe, healthy, inclusive, affirming and discrimination-free environment, includes:

- Using participants' chosen titles, names and language to describe their identities
- Prohibiting disclosure of information regarding LGBTQIA+ identities without participants' authorization
- Promptly documenting and addressing all incidents of harassment, bullying, discrimination, and/or violence
- Connecting clients to gender affirming healthcare providers

New in 2022 – LGBTQIA+ Policy (2)

- Making single access restrooms available to people of all genders
- When gender specific programs, activities and facilities are allowable, enabling access consistent with gender identity regardless of gender expression or sex assigned at birth
- Ensuring that any dress codes apply equally to all genders and do not include gender-specific elements.



Creating Safe Spaces and Practices

When trying to access services, people will ask:

- *Is this a place where I can be myself, or will I have to hide who I am?*
- *Is this a place where I will experience violence from people around me—employees, volunteers, or other residents?*
- *Will the people who work here understand what I need?*
- *Am I safe enough here to stay off the streets tonight?*

Make sure you have visible materials that communicate “all are welcome here”



**ASK ME MY
PRONOUNS.**



New in 2022 – LGBTQIA+ Policy (3)

- Establishing and publicly displaying LGBTQIA+ anti-discrimination policies;

For more information:

- [Equal Access Training Slides](#)
- [Video Recording](#)



Quick Poll



For each practice listed in the poll, has your agency:

- ☐ Fully implemented the practice
- ☐ Begun implementation of the practice
- ☐ Not yet begun

Responses are anonymous!

Immigration Status



- CT BOS Policy: Agencies not required federally to verify immigration status will not do so for CoC Projects.
- Nonprofits are not required to verify immigration status of CoC applicants.

HUD has determined that:

- Rapid Re-Housing assistance is not subject to immigration-based restrictions
- Transitional House must be provided without regard to immigration status
- See [SNAPS 8/16/16 Fact Sheet PRWOA of 1996 and HUD's Homeless Assistance Programs](#)

Non-discrimination Policies

Recipient and subrecipient must have policies indicating:

- Full compliance with federal non-discrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment, including reasonable accommodation provisions; and
- That they do not discriminate against a program participant or prospective 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.



Equal Access to HUD Programs

- Programs must be 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.” (*HUD FAQ ID 1913*)
- Families cannot be separated because of age or gender of household members.
- When projects serve ANY families with children, they must serve ALL families with children (single dad, single mom, same sex couple, multi-generational, non-romantic groups, etc.)



[Equal Access Rule Training Slides – CT BOS](#) [Video recording](#)

Limiting access based on gender

Projects may limit access based on gender only if:

- Project has shared bathing and/or sleeping accommodations
- Shared bathrooms = intended for use by more than one person at a time

(HUD AAQ Response – Question ID 75271)



Accommodating Changes to Family Composition – CT BOS Policy

- Allow participants to alter their family composition at any time during the admission process or post admission

EXCEPTIONS:

- Unit is not large enough by HUD standards
- Services required to meet needs of new family member are not available
- Housing the family together would present an imminent health and/or safety risk

When circumstances prevent accommodating family changes, projects must help families to access a different unit or work with their CAN to access a different project





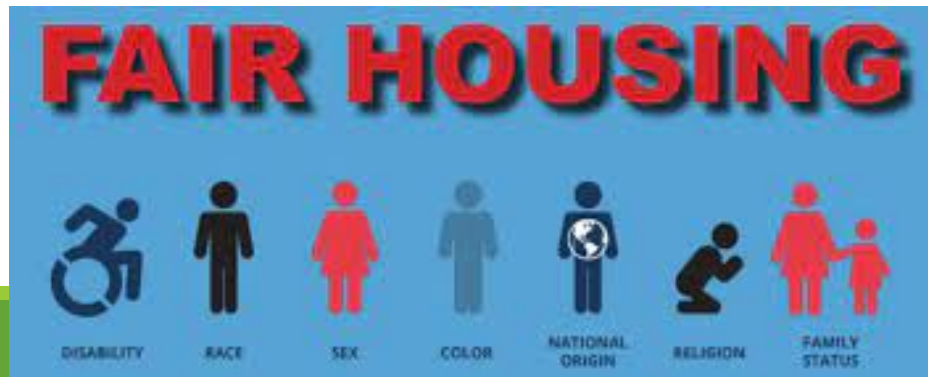
Fair Housing

- Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status or national origin.
- CT law also prohibits discrimination on the basis for gender identity/expression and sexual orientation
- 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

Affirmatively Furthering Fair Housing

1. Affirmatively market to persons who are least likely to apply in the absence of special outreach;
2. Maintain records of those marketing activities;
3. Report conditions or actions that impedes fair housing to DOH (or local Con Plan jurisdiction); and
4. Provide program participants with information on their rights and how they can make a complaint. This information is included in the [CT BOS Participant Bill of Rights](#).



Fair Housing - Tips



Applies to CoC funded projects and private market landlords:

- Retain all application records, including outcome and reason for denial
- Ensure your CAN is documenting marketing to persons least likely to apply in the absence of special outreach (e.g., to marginalized communities)
- 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 assists in ensuring the security of residents/property
- Ensure that any policy concerning a tenant's criminal record is absolutely necessary, and that no less discriminatory alternative is available

Fair Housing - Resource



TRAININGS



FACT SHEETS AND
BROCHURES

Reasonable Accommodations (504 of the Rehabilitation Act of 1973)

- Housing providers are required to make reasonable accommodations to enable people with disabilities to access housing
- Accommodations can include:
 - Increased payment standards/utility allowances
 - Larger units
 - Emotional Support animals (provide emotional support that alleviates one or more symptoms of an existing disability) – See [HUD Notice on Requests for an Animal](#)
 - Service animals (trained to do work or perform a task directly related to a disability)
 - Renting from family members
- Documentation can come from a physician, psychiatrist, social worker or other professional licensed to diagnose and treat the disability



Federal disability related requirements

Recipient and subrecipient must ensure:

- Physically accessibility of facilities
- Effective communication with applicants, beneficiaries, and members of the public
- To the maximum extent possible, ensure that individuals with disabilities receive the benefits and services of the CoC program or activity.



Accessibility of Electronic Documents Webinar

Presentation Slides:

[Accessibility Compliance Training \(Section 508\)](#)

Webinar Recording:

<https://youtu.be/jka7cRS2RGw>

Tools:

[Accessibility \(Section 508\) Guide with screenshots](#)

[Simple Steps to Create Accessible Materials](#)



Federal Limited English Proficiency (LEP) Requirements

Assess:

- Frequency of encounters with people with LEP
- Resources available

Determine:

- What language needs exist
- Reasonable steps to ensure access

Resources:

- [Sample Language Access Policy](#)
- [Final HUD Guidance – Prohibition Against Discrimination Affecting LEP Persons](#)





Zoom Poll Review



Additional Required Policies



Grievance Policy

- Have a written grievance policy and inform participants of that policy, including when someone is notified that assistance is being terminated.
- Designate a staff person assigned to help navigate the process (Required for DMHAS PSH and DOH RRH, best practice for others).

More details available here:

- [CT BOS Policies](#)
- [DMHAS CoC RA Operations Guide](#)
- [DOH RRH Operations Guide](#)

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 (Now Every Student Succeeds Act – ESSA):

[Information for Parents – In English – PDF](#)

[Information for Parents – En Español – PDF](#)

[Information for School-Age Youth – In English – PDF](#)

[Information for School-Aged Youth – En Español – PDF](#)





Educational Rights

Grantee/subrecipient required to:

- 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 transportation and assistance from the school district's homeless liaison
- Have a staff person designated to ensure educational rights and connect to educational services
- Adopt [CT BOS sample policy](#) or similar policy

Confidentiality

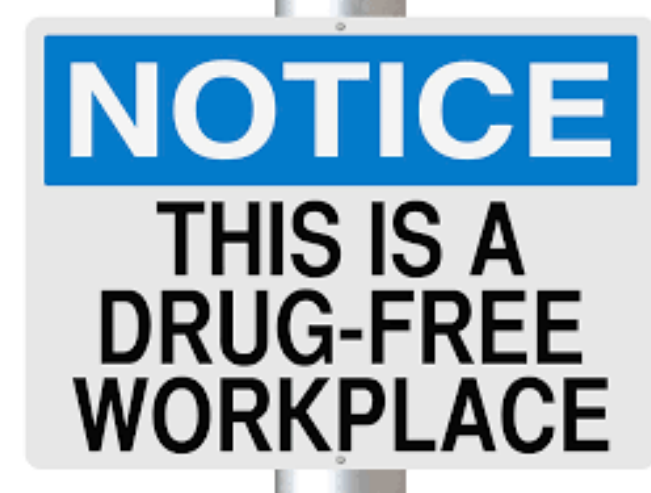
Recipients and subrecipients must have policies and procedures to ensure:

- Participant records containing identifying information are kept secure
- Information is handled in a manner that protects participant confidentiality

Policies must comply with federal HIPAA requirements, if applicable.



Drug-free workplace



Recipients and subrecipients must:

- Post a notice that the workplace is drug free.
- Publish a statement notifying employees that it is unlawful to manufacture, distribute, dispense, possess, or use a controlled substance in the applicant's workplace and such activities are prohibited.

Statement must:

- Specify the actions to be taken against employees for violations.
- Notify employees that they are required to abide by the terms of the statement and that employee must agree to notify the employer in writing if the employee is convicted for a violation of a criminal drug statute occurring in the workplace, no later than 5 calendar days after such conviction.

Drug-free workplace (2)



Recipients and subrecipients must:

- Notify HUD and other federal funders in writing within 10 calendar days after receiving notice of an employee's drug abuse conviction.
- Establish an ongoing drug-free awareness program to inform employees about:
 - a) The dangers of drug abuse in the workplace;
 - b) The policy of maintaining a drug-free workplace;
 - c) Available drug counseling, rehabilitation, or employee assistance programs;
 - d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

Conflicts of Interest



- A conflict of interest is a situation in which a person has competing commitments, obligations, duties or goals.
- EXAMPLE: Staff of an agency that owns a property cannot conduct rent reasonableness determinations or housing quality inspections for that property.
- Recipients and subrecipients must have a Conflicts of Interest Policy
- Policy must apply to employees, agents, consultants, officers, and elected or appointed officials
- No financial interests or benefit from assisted activity on part of staff (or persons with whom staff has immediate family or business ties) during his/her tenure with organization and one year following his/her tenure.



Written Standards

Recipient and subrecipient must:

- Follow the written standards developed by the CoC (See Local Requirements Slide)
- Adopt those written standards (e.g., in a policy)

DMHAS CoC Rental Assistance Projects covered by [CoC RA Operations Guide](#)

DOH RRH Projects Covered by [RRH Operations Guide](#)

New in 2021 – Rent Reasonableness Policies and Procedures

Recipients and Subrecipients must have written policies and procedures for:

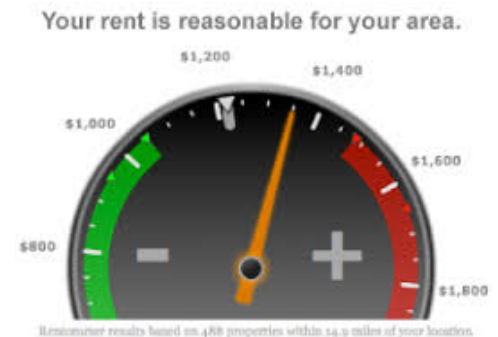
- Documenting comparable rents
- Determining rent reasonableness
- Documenting rent reasonableness in case files

DMHAS CoC Rental Assistance Projects covered by [CoC RA Operations Guide](#)

DOH RRH Projects Covered by [RRH Operations Guide](#)

[CoC Rent Reasonableness and Fair Market Rent](#)

[Rent Reasonableness Certification](#)





DATA



KNOWLEDGE



ACTION

Data Related Requirements

System Performance Measures (SPM)

1. Length of time homeless – Help people move to permanent housing as quickly as possible.
2. Returns to homelessness – Help people stabilize in housing and avoid returns.
3. # of people experiencing homelessness – House as many people as possible



System Performance Measures (SPM)

4. Employment and income growth – Help people connect to jobs and benefits.
5. New to the homeless system – Help people avoid becoming homeless in the first place.
6. Exits to permanent housing destinations – Help people who are leaving your project to access permanent housing.

[Link to CCEH Data Quality Improvement Page](#)



- Providers must enter program and client-level data into the CT Homeless Management Information System (HMIS)
 - Data uses, include:
 - CANs/service coordination
 - System Performance Measures
 - PIT Count/Housing Inventory Chart (HIC)
 - APRs/Renewal Evaluation
 - Connecticut Coalition on Ending Homelessness (CCEH) is the HMIS Lead for CT BOS.

For additional information, including a training schedule: <https://www.cthmis.com/>

Housing Inventory Count (HIC) & Point in Time Count (PIT)

- PIT: annual count of all persons experiencing homelessness on a single day at the end of January
- HIC: annual inventory of all shelter, transitional housing, rapid rehousing, permanent supportive housing and other permanent housing designated for homeless people

Please:

- Report data on time.
- Be sure data are accurate.
- Have more than one person who can access the [PIT Application](#)



How SPM and HIC/PIT Data are Used

Evaluate & improve performance

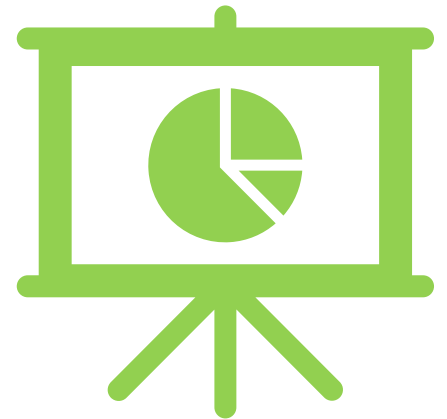
- Identifies areas of focus for Continuous Quality Improvement
- System Performance impacts the CoC's funding.
- Project performance impacts continuation of renewal funding and the ability to apply for new CoC funds.

Assess System Gaps

- What interventions are needed, where, and who needs them?

Strategic Planning

- Determine funding priorities
- Improve coordination among projects and sectors



Annual Performance Report (APR)

- All CoC Projects are required to submit an APR within 90 days after the project end date.
- Submit accurate, on-time APRs or HUD can put a hold on funding
- APR data come from HMIS – [Instructions for Running an APR](#)
- Submit to HUD via [Sage HMIS Repository](#)
 - HUD Training on [Using SAGE to Complete Your APR](#)





APR - Number of Participants

Verify number of participants served is consistent with the number in the project application



Zoom Poll



Other Administrative Requirements



Environmental Review (ER)

All CoC projects are required to complete an ER and update it:

- at least every 5 years (those done in 2018 will expire in 2023)
- when new scattered site units are rented
- when environmental conditions change

See [flow chart](#) to determine level of review required for your project.

Environmental Review [Frequently Asked Questions](#)

Lead – Coord with Dept of Health

TRA PROJECTS MUST:

- Share information with the local health department on a quarterly basis to protect children from known lead hazards



Record Retention

All records pertaining to CoC funds must be retained:

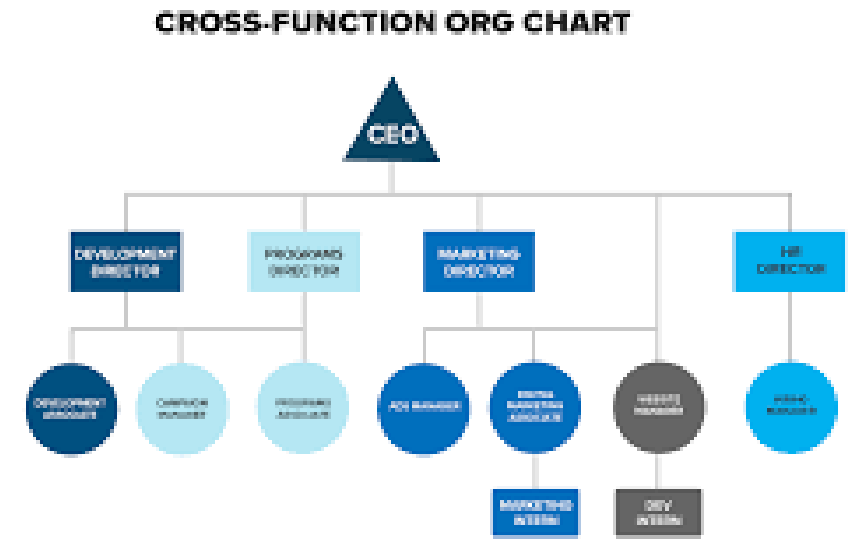
- Minimum of 5 years
- Participant eligibility documentation must be maintained for 5 years after the end date of the last grant period under which the participant was served.



Organization Chart and Job Descriptions

Recipient and subrecipient must have:

- Organization chart that illustrates the actual lines of authority/responsibility
- Job descriptions defining duties for staff



Subrecipient Monitoring



Recipient must maintain documentation that they:

- Evaluated each subrecipient's risk of noncompliance to determine the appropriate subrecipient monitoring
- Monitored subrecipients at least annually
- Retained documentation of monitoring and sanction of subrecipients, including findings and corrective actions required
- Provided a monitoring report to the CoC
- Retained subrecipient(s) response to resolve monitoring deficiencies

[Recipient vs. Subcontractor Guidance](#)

Subrecipient Agreements



Recipient must have signed agreement with subrecipient(s):

- Requiring subrecipients to operate the project in accordance with CoC Program Interim Rule
- Certifying that the subrecipients will: maintain participant confidentiality; ensure the location of any family violence project assisted was not made public; establish the required educational policies and procedures; designate a staff person responsible for ensuring that children served are enrolled in school and connected to appropriate services in the community; provide information, data and reports as required by HUD; and employees are not debarred or suspended from doing business with the Federal Government

Written Intake Procedures— DMHAS CoC RA and DOH RRH projects covered by relevant operations guide, [sample](#)

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. Staff member of grantee’s observation of the conditions where the individual was living
3. Self-certification – LIMITS APPLY
 - ✓ must be accompanied by intake worker’s documentation of the living situation and steps taken to obtain third-party documentation



HUD Grant Amendments

What activities require a grant amendment?

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

HUD Grant Amendments (2)

- **Grant recipients must submit proposed grant amendments to the relevant CAN for approval prior to submission to HUD.**
- Prepare a detailed, written request to the HUD Field Office
- Explain the reason for the change
- Justify same or better level of service, same # of participants
- Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)
- Cannot make the change until approved and contract is amended by HUD



Zengine

- BOS Grants Management Database
- CT BOS providers must:
 - Update Zengine Contacts at least quarterly. Avoid a Renewal Evaluation Penalty!
 - Provide at least 2 contacts
- More information available [here](#)



HUD CoC Renewal Application



- Every year all HUD CoC projects must submit a renewal project application.
- Must have at least two staff with [Esnaps Access](#)
- Timeline established when HUD releases NOFO (usually summer/fall)
- Housing Innovations provides trainings, deadlines and resources and reviews applications prior to submission to HUD.
- Awards typically announced in Dec/Jan



Final Suggestions & Questions?

Zoom Poll

Which of these compliance related training topics are most important for your agency?

- Participant Eligibility Documentation Requirements
- Supportive Service Requirements
- Rental Assistance/Leasing Requirements
- Eligible Expenses
- Financial Management Requirements
- Match Requirements
- Others? Put in chat or unmute





Additional Trainings



- HUD CoC Policies – CT BOS
- Managing CoC Grants – CT BOS
- Introduction to CT BOS

Presentation Slides: Introduction to CoC 2022

Recording: https://youtu.be/tyPoD_IM0sU

- DedicatedPLUS homelessness

Presentation Slides: [Dedicated Plus Webinar - PDF](#)

Webinar Recording: <https://youtu.be/yjkRJwo10Yg>

Info on DOH RRH Requirements



[DOH RRH Operations Guide](#)

DOH RRH Operations Guide Webinar

Slides: [DOH RRH Ops Guide Webinar 2022.03.30 – PDF](#)

Recording: https://youtu.be/ohjoYQPs_7E

All [DOH Required RRH Forms](#)

More information on DMHAS CoC RA Requirements

- [DMHAS CoC Rental Assistance Operations Guide Webinar](#)
- [DMHAS CoC Rental Assistance Operations Guide](#)
- [All DMHAS required CoC RA forms](#)



YHDP Requirements & Resources

[CT BOS Youth Page](#)

[CCEH YHDP Resources](#)





Resources for Fiscal Staff

Fiscal Components' Overview for CoC Grants-PPT

Indirect Cost Training

- Recording: <https://youtu.be/YwjZYf7vMyc>

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