



# Connecticut Balance of State Continuum of Care

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*Ending Homelessness in Connecticut* | Email: [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com) | Website: [www.ctbos.org](http://www.ctbos.org)

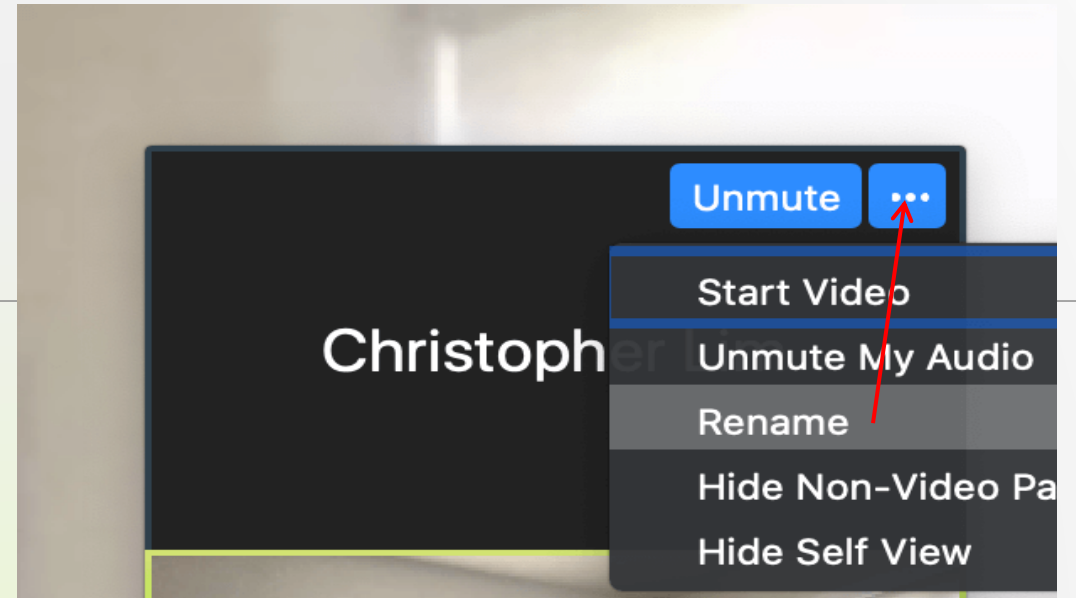
## *Overview of Continuum of Care (CoC) Fiscal Requirements*

Part 1- 2/20/25

*Training Provided by Housing Innovations  
Howard Burchman & Lauren Pareti*

# Welcome

- Introduce Facilitators
- Goals for the Session
- Housekeeping
  - PLEASE TURN YOUR CAMERAS ON AS MUCH AS YOU CAN.
  - Please put your name as you would like to be addressed as your screen name.
  - We will upload the slides to the chat box momentarily.
  - We love interaction – please raise hand, use emojis, type comments in the chat box or just unmute and talk!
  - The session is being recorded and will be posted to the web.
  - Slides are available in the chat.
  - Today's session is 90 minutes



A large group of people are seated at long white tables in a bright, modern meeting room. They are engaged in various activities: some are looking at laptops, others are talking to each other, and some are looking towards the camera. The room has large windows in the background, and the overall atmosphere is collaborative and professional.

# We Love Interaction

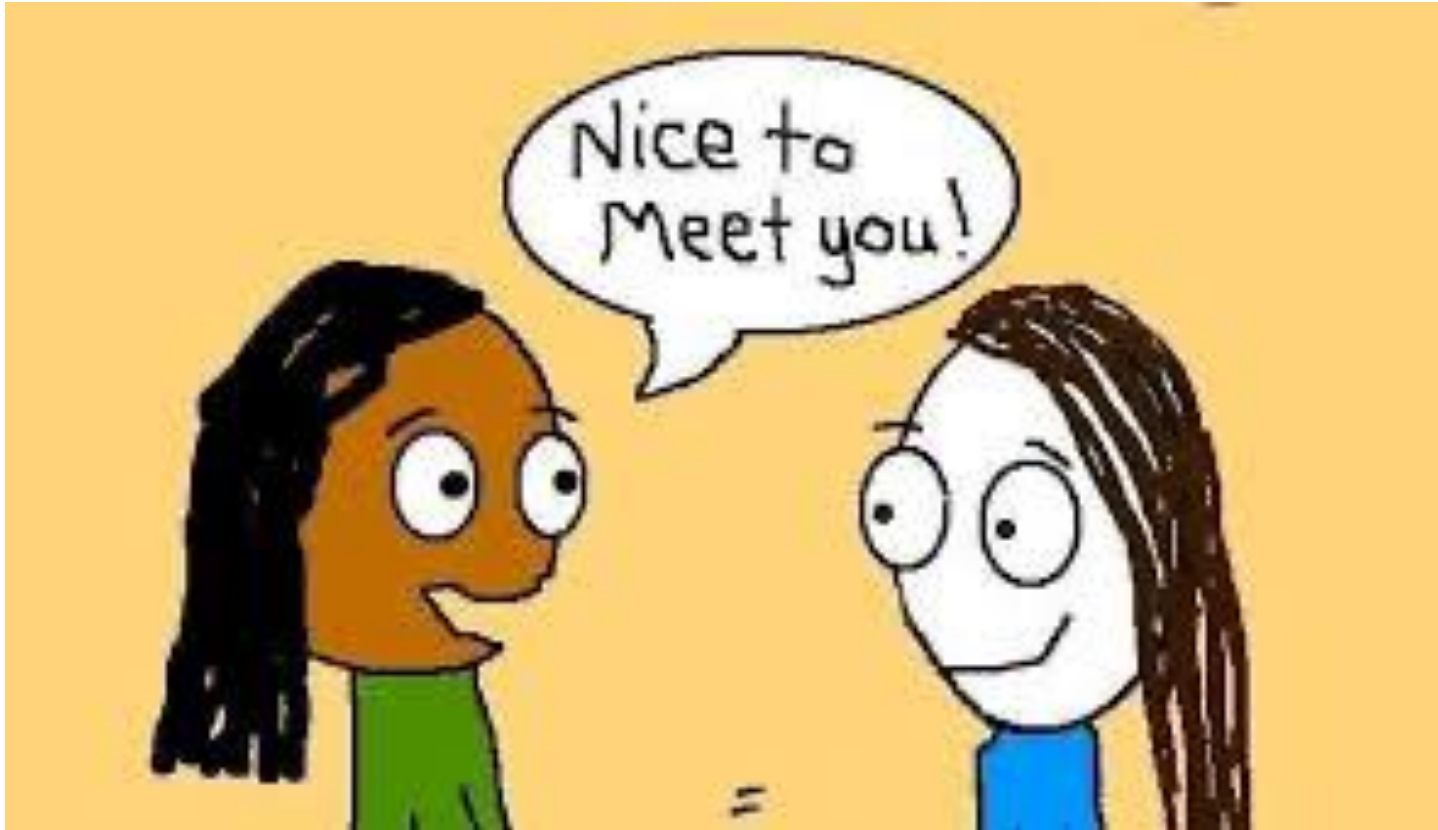
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If you don't have a microphone or are having trouble with audio in Zoom, join via phone:

Phone: 646-876-9923

Meeting ID: 810 6676 8403

Passcode: 422407



# Who is with us today?

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**Please share in the chat box:**

- Your agency and role/title
- Your location
- Something that makes you smile.

# Agenda Session #1:

- Welcome & Introductions
- Match
- Program Income
- Federal Cost Principles
- Eligible Costs: Rental Assistance, Leasing, Operating, Supportive Services, VAWA



3/6/25  
Agenda  
Session #2:

- Ineligible Costs
- Documenting Staff Time
- Project Administration Costs
- Indirect Costs
- Single Audits
- Grant Expenditures
- eLOCCS
- Compensation and Gifts
- Internal Controls
- Sanctions

# Definitions: Grant Recipient & Subrecipient

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## **Grant Recipients** -Can be government or non-profit

- Usually, CT Department of Housing (DOH) for Rapid Rehousing (RRH)
- Usually, CT Department of Mental Health & Addiction Services (DMHAS) for Permanent Supportive Housing (PSH)
- Execute grant agreement, receive funding from HUD via eLOCCS



## **Non-Profit Subrecipients**

- Receive CoC funding from and report to recipient

## 24 CFR 578.73 all HUD CoC funded activities – except leasing – must meet the 25% match requirement



If in **cash**, organization must show that it received and expended the cash on eligible CoC activities during the contract term

**DMHAS** documents match for PSH projects when DMHAS is the recipient & unit is designated to serve people who meet the DMHAS disability definition

**Benefits** paid directly to program participants do not qualify as match – funds must be received by recipient agency





# YHDP Match Special Activity

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- If approved by HUD YHDP recipient is not required to meet the 25% match requirement - check your grant agreement.

# Match can also be met with in-kind goods or services

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**If in-kind,**

- MOU between recipient and third-party providing match prior to contract
- Goods or services must be eligible under CoC Interim Rule
- Documentation of actual in-kind services/contributions received by program participants/project during grant term.
- Must be able to demonstrate that services were actually received
- If providing services, they should be valued at standard industry rates for similar services provided by persons with similar credentials.

# Documenting In-Kind Match

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- Value of commitment must be documented on source agency letterhead, signed & dated.
- Value must be consistent with the cost ordinarily paid for similar goods in the local market.
- Requirements for letter:
  - Date on which the in-kind donation will be available
  - Project and operating year to which the match is being contributed
  - Allowable activities to be provided by the donation



# Documenting In-Kind Cash Match

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- Requirements for the MOU:
  - Establish the unconditional commitment to the CoC project
  - Describe specific service/goods to be provided during term of grant
  - State profession of the persons providing the service

# If match is not met

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If recipient cannot document that it has met the match through cash or in-kind, recipient to pay the missing funds directly to HUD

# Program Income



## Generated by a **grant-supported activity**

- In CoC program, most program income is tenant rent paid directly to recipient/sub-recipient
- Leasing, sponsor and project based rental assistance

Must be expended on **eligible program expenses** in the program year in which it was earned



Can be used to **meet match requirements**



Poll – What  
can't be used as  
match

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Proceeds from the grantee's annual gala used to support agency programs

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Resident income gained by program case managers using SOAR to secure SSI benefits for residents

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Substance use treatment services provided to program participants through a MOU with a treatment provider

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The cost of rent for the supportive services office that is donated by a member of the organization's board of directors

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## ANSWER

Poll – What  
can't be used  
as match?

Resident income gained by  
program case managers using  
SOAR to secure SSI benefits for  
residents

# Determining Cost Eligibility

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Costs  
are  
only  
eligible  
if the  
are:

- Associated with a CoC eligible client
- Specifically eligible in CoC Interim Rule (24 CFR 578)
- Delineated in the technical submission and HUD approved budget
- Documented



# Four Federal Cost Principles

Reasonable	Allocable	Consistently treated	Allowable
<ul style="list-style-type: none"><li>• If the nature of the goods/services and the price paid reflects what a prudent person would have done in similar circumstances, cost is reasonable.</li></ul>	<ul style="list-style-type: none"><li>• Can the cost be allocated to a federal award based on the benefit provided?</li></ul>	<ul style="list-style-type: none"><li>• All costs for same purpose and in like circumstances must be treated uniformly as direct or indirect costs.</li></ul>	<ul style="list-style-type: none"><li>• Is the expenditure eligible within general Federal regulations and the requirements of the specific award?</li></ul>

Eligible Costs	Approved Costs
All costs included in the CoC Program interim rule	<ul style="list-style-type: none"> <li>• Each project has approved budget line items</li> </ul>
	<ul style="list-style-type: none"> <li>• May only spend CoC Program funds on approved costs</li> </ul>
	<ul style="list-style-type: none"> <li>• 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</li> </ul>

# Principle of Cost Allocability

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**For a cost to be allocable it must be:**

- In the approved budget for the funded program
- Specifically linked to the eligible activities funded in the grant
- Reasonable
- Documented



# 'Reasonable Costs'

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## For a cost to be reasonable:

- It should be ordinary and necessary for the operation of the organization and/or project
- Cost is in accordance with market prices for comparable goods and services as evidenced by cost estimates and documentation
- The individual responsible acted with prudence for benefit of organization
- Cost was incurred after following established policies and procedures of the organization

# Procurement

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Procurement policies must be in place

Must follow written procedures and document compliance

Small purchase method may be used for purchases below \$250,000 - requirements include:

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



# Poll – Cost Eligibility

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- Can projects expend CoC funds on expenses that are eligible under the CoC Program Interim Rule but not delineated in the approved project budget?
- If the CoC Program Interim Rule does not specify that an expense is ineligible can you assume it's eligible?
- What risks does a project face if they charge an ineligible expense?



# ANSWERS: Poll – Cost Eligibility

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- Can projects expend CoC funds on expenses that are eligible under the CoC Program Interim Rule but not delineated in the approved project budget?

**NO**

- If the CoC Program Interim Rule does not specify that an expense is ineligible can you assume it's eligible?

**NO**

- What risks does a project face if they charge an ineligible expense?
- **HUD may issue a monitoring finding and recapture the funds.**



# Rental Assistance – Eligible Costs

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## Eligible Costs paid on rental assistance budget line

- Up to 100% of rent
- 2 months' Security deposit (1 month for participants 62 or older)
- First and last month's rent
- Damages to unit (not to exceed 1 months rent and paid only after tenant leaves unit)
- Administering rental assistance: HQS inspections, rent calculations, documenting and verifying income, rent reasonableness
- *Environmental reviews are paid by administrative funds.*



# Eligible Costs - Leasing

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## Eligible Costs under leasing budget line:

- Rental payments not to exceed the lower of reasonable rent or the Fair Market Rents
- Electricity, gas, and water if these costs are included in rent
  - If not included can only be paid as an operating cost
- Security deposits
- Advance payment of last months rent as well as first months rent when signing lease



# Eligible Costs - Operating

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

- ✓ Maintenance and repair
- ✓ Building security (units must be more than 50% CoC funded)
- ✓ Electricity, gas, water & sewer
- ✓ Furniture
- ✓ Equipment
- ✓ Staff and overhead costs related to carry out these activities



# 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	Any unlisted cost is <b>ineligible</b> . Check <a href="#">CoC Program Interim Rule</a> for limits on listed expenses.	

# YHDP Supportive Services Special Activities



If approved by HUD, the following are eligible on YHDP Supportive Services BLI – check your grant agreement:

- Rental Arrears (up to 6 months)
- Utility arrears (one-time, up to 6 months)
- Utility payments (up to 6 months)
- Moving expense more than one time (including truck rental and moving company costs or furniture bank delivery fees.)
- Unit damages (not to exceed 2 months)
- Internet service
- Car insurance, registration, and past driving fines
- Mileage for participant personal vehicle (trips for eligible services only)

# YHDP Supportive Services Special Activities (2)

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If approved by HUD, the following are eligible on YHDP Supportive Services BLI – check your grant agreement:



- Housing start-up expenses - furniture, pots/pans, linens, toiletries, and other household goods, not to exceed \$300 in value per program participant
- The costs of providing household cleaning supplies to program participants.
- Purchase of cell phone and service (must be housing related)
- Legal Fees

# 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.

# Examples of Ineligible Costs – Supportive Services

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- Staff training and the costs of obtaining professional licenses or certifications - training on CoC Requirements only is an eligible cost under project administration.
- Gift Cards
- Immigration legal services
- Car repairs or maintenance on behalf of participant are only eligible if both conditions are met:
  - ✓ public transportation is insufficient in the area; and
  - ✓ cost may not exceed 10% of Blue Book value





# How can we pay for furniture?

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Furniture for participant units is eligible under:

- Operating (but most projects don't have an operating BLI - Operating & Rental Assistance cannot be combined)

Furniture for staff offices is eligible under:

- Supportive services - if in a supportive services facility



See also YHDP RRH Special Activities

# How can we pay for household supplies?

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- Supplies used to maintain/repair housing units are Operating costs.
- If necessary to assist the program participant to maintain housing, costs of teaching life skills are Supportive Services expenses (life skills training)
  - e.g., kitchen wares, linens & cleaning supplies, necessary to teach household management and nutrition.
- Costs of activities to engage participants for the purpose of providing immediate support and intervention and identifying potential program participants are eligible Supportive Service expenses (outreach) - includes addressing “urgent physical needs” such as providing blankets and toiletries.
- See also YHDP RRH Special Activities





# How can we pay for office supplies?

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- When delivering eligible supportive services, the costs of supplies and materials incurred in directly providing those services to participants are eligible supportive service costs.
- Costs for supplies and materials that cannot be readily assignable to an eligible activity at the CoC project (e.g., office supplies for your HR department) are an indirect expense.

# VAWA Emergency Transfer Facilitation

## Eligible Costs



Moving costs



Travel Costs – including outside of CoC



Security Deposits



Utilities – establishing service



Housing Fees – application, broker, pet fees (if needed for safety)



Technology to make unit safe (internet to connect system)



Case management



Housing Navigation

# VAWA Confidentiality Compliance – Eligible costs



Monitoring and evaluating compliance

Developing strategies for corrective actions and remedies

Training on confidentiality requirements

Reporting on compliance

Staff time on maintaining confidentiality

# Poll - What type of expense is this?

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- Staff salary for conducting HQS inspections
- Benefits for case management supervisor
- Unit damages



# ANSWERS: Poll - What type of expense is this?

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- Staff salary for conducting HQS inspections  
Rental Assistance or Leasing
- Benefits for case management supervisor  
Supportive Service
- Unit damages  
Rental Assistance







# Final Questions & Suggestion?

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THANK YOU FOR PARTICIPATING

# CT BOS Team (Housing Innovations)

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