



# CoC Housing Requirements

March 18, 2025

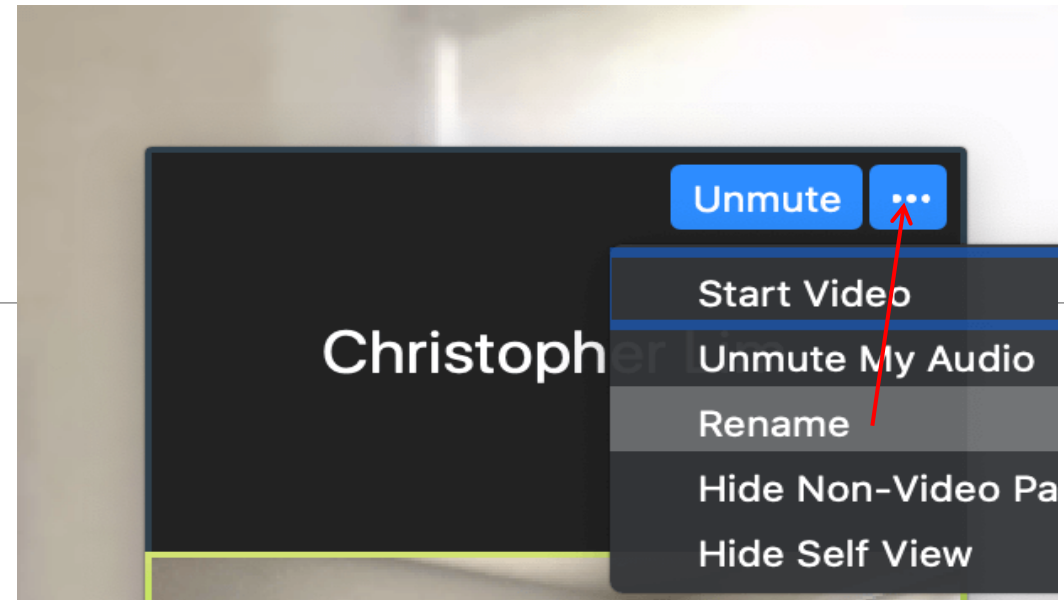
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LAUREN PARETI &  
SHANNON QUINN-SHEERAN  
*HOUSING INNOVATIONS*

# Welcome

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- 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.
  - Today's session is 2 hours





# 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:

Meeting ID: 851 7878 0207

Passcode: 855813

Phone: 646-876-9923



# Introductions

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Introduce yourself in the chat box:

- Agency
- Title
- How long have you been involved in CoC programs?

# Agenda

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## Session #1 - TODAY

- Project Entry Requirements
- Unit Search & Approval Requirements
- Leasing Requirements

## Session #2 – 4/1/25

- *Income Determination & Rent Calculation*
- *Re-Determination*
- *Project Exit Requirements*
- *DMHAS Specific Requirements*



**WE WEAR  
MANY HATS.**



# Who Is With Us Today? – Zoom Poll

What type of CoC project(s) do you work in?

What role(s) does your agency play in those projects?



## Why is compliance with housing requirements important?

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- Requirements protect participants' rights.
- Non-compliance can result in recapture of HUD funds.









# Missing Federal Documents

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- Some resources linked in this presentation have been removed from federal websites.
- Where we were able to find those resources elsewhere on the web, we have updated the links.

# Rapid Rehousing (RRH) & Permanent Supportive Housing (PSH) Requirements

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- [CT Statewide RRH Operations Guide](#)
- [CT Statewide PSH Operations Guide](#)
- Visit [CT BOS Training Page](#) for related trainings



# Required Forms & Documentation Checklists

Available on [CT BOS Resources Page](#)

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## **Forms:**

- [DMHAS CoC Rental Assistance Documents](#)
- DOH Rapid Rehousing Documents

## **Checklists:**

- DMHAS CoC Rental Assistance – Required Documents Checklist
- RRH – CT RRH File Checklist
- All CoC Projects - Participant Chart Requirements by Project Type



# Participant Chart Documentation Requirements by Project Type

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- May be most helpful for projects that are not subcontracted through DMHAS or DOH
- 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
  - Street Outreach
- Links to forms and other guidance



# Keep Current – Sign Up for CT BOS Emails

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## Email Lists

- General
- HUD Grantees
- SNOFO Providers
- Steering Committee
- YHDP

- Self-Register on CT BOS homepage ([www.ctbos.org](http://www.ctbos.org))
- To receive important information about policies and processes that impact CT BOS funded projects select either HUD Grantees or YHDP
- Be sure new staff register



# Project Entry Requirements

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Highlights: For a complete list see Operations Guides

# Participant Eligibility Documentation

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Required for all project types

Most common recapture risk

**Eligibility Webinar:**

- [Webinar Slides](#)
- Recording: [https://youtu.be/\\_Cj7jlcK6jY](https://youtu.be/_Cj7jlcK6jY)

**Also Required:** [CAN Referral Form](#)

[Self-Certification Guidance](#)



# Notification of Grievance Rights

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CT BOS funded projects and Coordinated Access Networks (CANs) are required upon application, at project entry and at a minimum annually to:

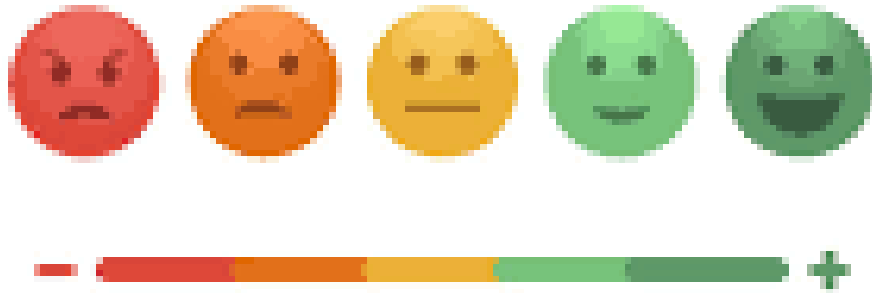
- Provide participants with a [notice](#) summarizing grievance rights ([notice-Spanish](#)); and
- Review the notice with participants/applicants to help them understand their grievance rights.

Knowledge  
is power 




# WEBINAR: Participant Grievances

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- Webinar Slides
- Webinar Recording

A photograph of a document titled "Bill of Rights" on aged, yellowed paper. The text "Bill of Rights" is written in a large, black, serif font. Below the title are several horizontal lines, some of which are faintly visible. A red and gold pen is positioned diagonally across the right side of the document, with its tip pointing towards the top right corner. The background is a plain, light color.

Bill of Rights

CT BOS Participant Bill of Rights: [CT BOS Participant Bill of Rights](#); [Spanish Version](#) – *Updated Jan 2024*

# Acknowledgment of Receipt of Rights Notices

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Sample form to obtain participant sign-off for the following CT BOS Notices:

1. Participant Bill of Rights
2. VAWA Emergency Transfer
3. Grievance

Providers can opt to use a different method to document notification.

- [Acknowledgment of Receipt of Rights Notices](#)
- [Spanish Acknowledgment of Receipt of Rights Notices](#)

See also these required forms:

- [DOH: 6 – Participant Docs Received](#)
- [DMHAS: Participant docs received sign off list](#)



# Releases of Information

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- [HMIS Release of Information](#)
- [HMIS Spanish ROI](#)
- DMHAS LMHA Specific (if applicable)
- Provider Agency Specific



# VAWA Documentation

Required for PSH, RRH, TH, YHDP Crisis Housing

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- [ER Transfer Rights Notice for DV](#)
- [Plan de Traslado de Emergencia – Info para Residentes](#)
- [VAWA Domestic Violence Incident Certification Form \(HUD-5380\) – DOC](#)
- [VAWA Notice of Occupancy Rights \(HUD-5380\) – DOC](#)
- [VAWA Lease Addendum – DOC](#)

**For more information see:**

Slides: [VAWA Requirements](#)

[Recording](#)



# Zoom Poll

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True or False:

- All DOH and CT BOS RRH projects are required to follow the policies & procedures outlined in the RRH Operations Guide
- All CoC PSH projects are required to follow the policies and procedures outlined in the PSH Operations Guide.
- Only DOH and DMHAS subrecipients need to pay attention to the Operations Guides
- To sign up for emails pertaining to my CoC project I register at [www.ctbos.org](http://www.ctbos.org)
- I only need to notify participants of their Grievance rights when they have a complaint.

# Zoom Poll - ANSWERS

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True or False:

- All DOH and CT BOS RRH projects are required to follow the policies & procedures outlined in the RRH Operations Guide **TRUE**
- All CoC PSH projects are required to follow the policies and procedures outlined in the PSH Operations Guide. **TRUE**
- Only DOH and DMHAS subrecipients need to pay attention to the Operations Guides **FALSE**
- To sign up for emails pertaining to my CoC project I register at [www.ctbos.org](http://www.ctbos.org) **TRUE**
- I only need to notify participants of their Grievance rights when they have a complaint. **FALSE**



# Unit Search & Approval Requirements

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Highlights: For a complete list see Operations Guides



# Housing Search & Support

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Participants are not responsible for finding their own units.

Essential considerations:

- Participant preferences ([Tool: Housing Preferences](#))
- In RRH, affordability when assistance ends:
  - ✓ Consider employment history and near-term, feasible income goals
  - ✓ Units that are not affordable within the reasonable, anticipated budget are not a good fit.



# HUD NSPIRE Standards to Replace HQS

(HQS: Housing Quality Standards; NSPIRE: National Standards for the Physical Inspection of Real Estate )

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NSPIRE will be required for all COC, ESG, and HOPWA programs  
– effective 10/1/25

HUD intends to release program specific requirements and other guidance.

CT BOS will update the PSH & RRH Operating Guides and provide additional information when HUD releases more guidance.

# NSPIRE Overview

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- Goal is a simpler process focused on health & safety not appearance
- Fewer standards than HQS
- Includes inspection of individual units, inside public areas, & outside structure
- Self-inspection required annually – using electronic submission that enables photo uploads
- Third-party inspection required every 1-3 years depending on self-inspection outcomes.

# Housing Quality Standards (HQS) Inspections

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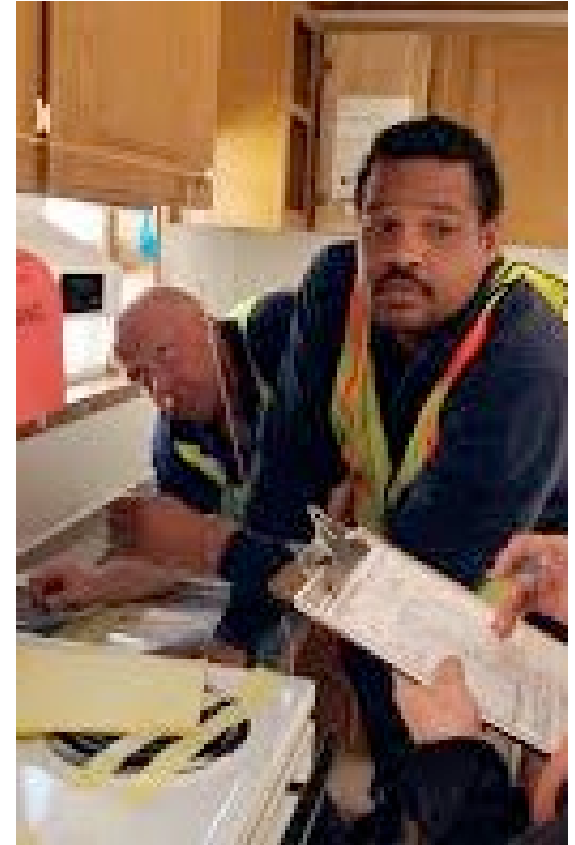
Must be performed prior to occupancy and every 12 months

- HUD [HQS Inspection checklist](#)
- Units assisted with rental assistance or leasing must be inspected prior to occupancy and must be reinspected annually or when unit is considered at risk of failing – units may not be subsidized prior to passing inspection.
- No specific requirement on who is qualified to do HQS inspections
- All participant files where the participant is receiving rental assistance or leasing assistance must have a current HQS inspection form
- Costs of HQS inspections should be charged to rental assistance or leasing budget lines

# Housing Quality Standards (HQS) Inspections (2)

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- Acceptability criteria
- Be sure HQS form is signed and dated.
- Be sure unit indicated on HQS form matches lease.
- Be sure lead-based paint visual inspection is documented if applicable.
- Housing projects without CoC Leasing or Rental Assistance funds: HUD's Emergency Solutions Grant minimum habitability standards.



# Lead-Based Paint

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Units constructed prior to 1978 may have lead-based paint

Prior to occupancy, a lead-based paint visual assessment **must be conducted** in any unit that will be occupied by children under 6 or a pregnant mom

Inspectors must take HUD's Lead-Based Paint Visual Assessment Training and maintain certificate on file

Document participant receipt of Lead Hazard Information Pamphlet via the Lead Paint Disclosure Form

# Fair Market Rents (FMR)



Annually HUD evaluates rents in market areas to determine the costs of decent, non-luxury housing

FMRs by bedroom size:

- Are the maximum that can be applied for in projects using leasing or rental assistance
- Are the maximum rents that can be paid for in units assisted with leasing

FMR levels are inclusive of utility costs at the PHA utility allowance schedule.

# Rent Reasonableness



For projects using **rental assistance**, the maximum rent that can be paid is the reasonable rent

For projects using **leasing**, maximum rent is the lessor of the Fair Market Rent or reasonable rent

Rent is reasonable if the rent is equal or less than that of three comparable units (size, location, amenities)

- Must be determined at initial occupancy and annually
- Must be documented in participant files



# Rent Reasonableness Checklist

	Proposed Unit	UNIT #1	UNIT #2	UNIT #3
ADDRESS				
NUMBER OF BEDROOMS				
SQUARE FEET				
TYPE OF UNIT/CONSTRUCTION				
HOUSING CONDITION				
LOCATION/ACCESSIBILITY				
AMENITIES  UNIT:  SITE:  NEIGHBORHOOD:				
AGE IN YEARS				
UTILITIES (TYPE)				
UNIT RENT UTILITY ALLOWANCE GROSS RENT				
HANDICAP ACCESSIBLE?				



# Project Occupancy and Spending

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- Maintain occupancy at least at the level committed in your project application.
- Do not spend more than what is in your grant.
- Take prompt action to correct any under-spending:
  - Serve more households than indicated in your project application if budget is sufficient - does not require a grant agreement amendment.
  - Seek a HUD grant agreement amendment to shift funds among budget line items (if more than 10%) – Subrecipients must work with DMHAS/DOH
  - Identify any amount that the project is regularly unable to spend and that should be returned to the CoC to fund new projects.

# Conflicts of Interest

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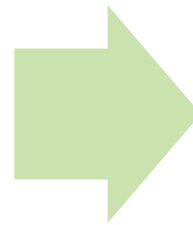
- Financial interests/benefit from assisted activity during tenure with organization and one year following tenure are prohibited. Applies to:
  - ✓ Staff
  - ✓ Person with whom the staff member has immediate family or business ties
  - ✓ Board
  - ✓ Consultants
- Examples:
  - ✓ May not lease units/structures 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.



# Environmental Review Flow Chart

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Project with only  
Operating/Admin  
Supportive Services,  
HMIS not used to lease  
space



Project may proceed.  
HUD completed a  
Nationwide  
Programmatic  
Environmental Review

# Environmental Review (ER -1)

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- All other projects are required to update ER at least every 5 years or when environmental conditions change.
- Most CT BOS projects completed ER in 2023 – expiring in 2028
- Check the date that your last ER was signed by the Responsible Entity to determine when your project's ER expires.
- [Environmental Review FAQ](#)

# Responsible Entity (RE)

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- RE is local government agency where project is located that exercises land use responsibility.
- Forms must be signed by RE.
- Recipients/Subrecipients may not sign off as the RE
- If your RE refuses to sign, notify the Field Office, keep copy on file and send forms to DOH to sign.
- RE has the option to approve on a project-wide basis (i.e., not to sign each time you rent a new unit).





# Environmental Review (ER – 2)

## Choice limiting actions

Limits participants' choices of reasonable alternatives

- Includes signing a lease as well as acquisition, rehabilitation, new construction
- In CoC includes project based leasing, sponsor and project based rental assistance
- Requires a unit/site specific environmental review
- Use [CEST Form](#) (Categorically Excluded Subject to Section 58.5)
- [Sample Completed CEST Form](#) for a CoC Project
- For DHMAS funded projects that require a CEST review, DHMAS has contracted a consulting firm to complete the environmental review

# Environmental Review (ER – 3)

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## Non-Choice limiting actions:

Are categorically excluded not subject to 58.5

- Tenant based rental assistance
- Leasing assistance where tenant chooses unit
- Environmental review conducted on a project not a unit/site
- Use [CENST Form](#) (Categorically Excluded Not Subject to Section 58.5)
- [Sample Completed CENST Form](#) for a CoC Project





# Exempt projects must still verify on a project basis

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## Not within the scope of:

- Airport Runway Clear Zones – cannot lease units in these areas
- Coastal Barrier Resources – cannot lease units in these areas (maps here: [CBRS Mapper \(usgs.gov\)](https://www.usgs.gov/land-use-planning/land-use-planning-topics/coastal-barrier-resources))
- Flood insurance – If in a zone where flood insurance is required, can only lease if insurance is in place



# Environmental Review – DOH RRH

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## Environmental Review

- ✓ DOH maintains the principal documentation
- ✓ For units in a coastal community (see list on [Form #19](#)), the Case Management or Housing Location Provider is responsible for checking unit addresses against the [US Fish and Wildlife Service's Coastal Barrier Resource System Mapper](#) and retaining a copy of the Coastal Barrier Resource System (CBRS) map documenting that the unit is not within a Coastal Barrier Resource Unit. Rental assistance cannot be provided to units within the Coastal Barrier Resources System.



# Zoom Poll

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- You don't need to worry about rent reasonableness if the rent is below FMR?
- To be considered comparable a unit must be:
  - *Located in a place that is comparable to the assisted unit; and*
  - *Comparable in size to the assisted unit; and*
  - *Of comparable quality & have comparable amenities to the assisted unit*
- A project needs a new environmental review every 3 years
- Dogs are perfect.



# Zoom Poll - ANSWERS

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- You don't need to worry about rent reasonableness if the rent is below FMR?  
**FALSE**
- To be considered comparable a unit must be: **ALL TRUE**
  - *Located in a place that is comparable to the assisted unit; and*
  - *Comparable in size to the assisted unit; and*
  - *Of comparable quality & have comparable amenities to the assisted unit*
- A project needs a new environmental review every 3 years -**FALSE**
- Dogs are perfect. **TRUE** 😊



# Leasing & Occupancy Agreement Requirements

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Highlights: For a complete list see Operations Guides

# Leases/Occupancy Agreements

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Must have signed occupancy agreements or leases with program participants residing in housing –samples on [CT BOS Resources Page](#) & [Youth Page](#)

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All households receiving rental assistance and all PSH tenants must pay rent; In TH those assisted by leasing or in projects assisted with operating costs may be charged rent (except YHDP crisis housing)

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For rental assistance, initial lease term must be at least one year and automatically renewable.

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For transitional housing, occupancy term must be at least one month and automatically renewable for a maximum term of 24 months. (exceptions in YHDP may apply)

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Participant files must contain copies of leases/occupancy agreements.



# Lease Arrangements

## Tenant-based and Project-based Leases



# Housing Assistance Payment (HAP) Agreements

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- Contract between the property owner and the agency administering Rental Assistance
- HAP required for all Tenant-based Rental Assistance in PSH projects
- Term must be identical to lease term
- Establishes, for example:
  - Amount paid by subsidy and tenant – subject to change
  - Prohibition of side deals
  - Conditions under which the subsidy may be terminated
  - Right to inspect and withhold subsidy if the unit does not pass HQS
  - Procedures for charges against and return of security deposit
- RRH Requires RRH Rental Assistance Agreement

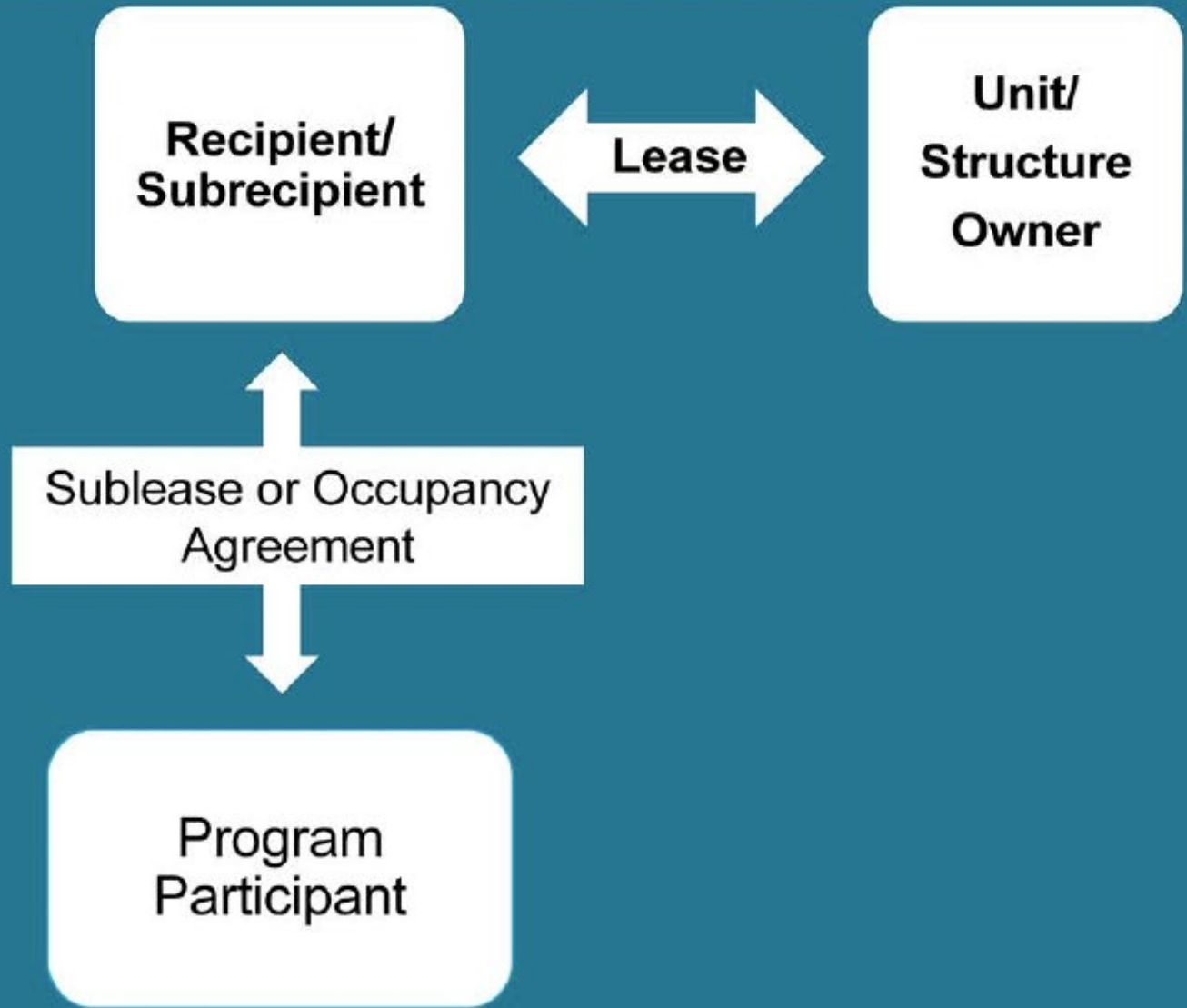




# Leasing Agreements

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Applies to Projects with CoC Leasing Budget Line Item



# Moving to a Different Unit

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At end of lease, TRA participants may move:

- New unit must meet HQS & Rent Reasonableness
- New unit must be located within CTBOS and project service area (DV exceptions)
- Participant can access a new security deposit
- Change order required for DMHAS projects
- RRH projects must follow procedures of the Fiduciary Agency

# Zoom Poll

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Which of the following types of CoC projects requires that participants have a signed lease or occupancy agreement (select all that apply)?

True or False?:

- Projects that use the CoC Leasing Budget Line Item can opt either to sublease units to project participants or have participants sign leases directly with the property owner.
- Participants who wish to move to a different unit are required to find their own security deposit.

# Zoom Poll - ANSWERS

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Which of the following types of CoC projects requires that participants have a signed lease or occupancy agreement (select all that apply)? **PSH, TH, YHDP  
CRISIS HOUSING, RRH**

True or False?:

- Projects that use the CoC Leasing Budget Line Item can opt either to sublease units to project participants or have participants sign leases directly with the property owner. **FALSE**
- Participants who wish to move to a different unit are required to find their own security deposit. **FALSE**



# What items from today's training will you follow up on?

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PUT IN CHAT OR UNMUTE TO SHARE

# Additional Trainings

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All trainings available at [www.ctbos.org/training](http://www.ctbos.org/training):

- Documenting Participant Eligibility
- CoC Grant Management Requirements
- CoC Policy and Administrative Requirements
- CoC Fiscal Requirements
- CoC Monitoring
- Equal Access
- RRH Utility Allowances and Reimbursements





# Final Questions & Suggestion?

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THANK YOU FOR PARTICIPATING

# CT BOS Team (Housing Innovations)

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