

# FY23 Continuum of Care Program Start Up Training

WV Balance of State (BoS) Continuum of Care (CoC)



# Purpose

The purpose of today's training is to describe the responsibilities of agencies funded under the FY 2023 Continuum of Care (CoC) funding competition: overall grant management, eligibility and documentation, program-specific requirements, financial oversight, and recordkeeping requirements.

# What is this CoC acronym?

- Stems from the HEARTH Act
- HEARTH Act is the Federal law signed in May 2009, reauthorized HUD's McKinney-Vento Homeless Assistance Act
  - Legislative mandate to adopt a collaborative approach and produce a national strategic plan (Opening Doors: 2010; Home, Together: 2018; One HUD, For All: 2022)
  - Consolidated HUD's competitive grant programs.
  - FY2013 was the first time grants renewed under the CoC rule due to the HEARTH Act
  - Changed HUD's definition of homelessness and chronic homelessness
  - Increased prevention resources (for High Performing Communities only currently)
  - Increased emphasis on performance

# Continuum of Care

Federal regulations (24 CFR 578) note that the purpose of the CoC is to:

- Promote community-wide commitment to end homelessness
- Provide funding to quickly re-house people experiencing homelessness while minimizing trauma and dislocation through:
  - Permanent Housing (Permanent Supportive Housing and Rapid Re-Housing, Transitional Housing-Rapid Re-Housing Joint Component, Homeless Management Information System (our database), Supportive Services Only for Coordinated Entry)
- Optimize self-sufficiency among people experiencing homelessness

# CoC Responsibilities

## Operate the CoC:

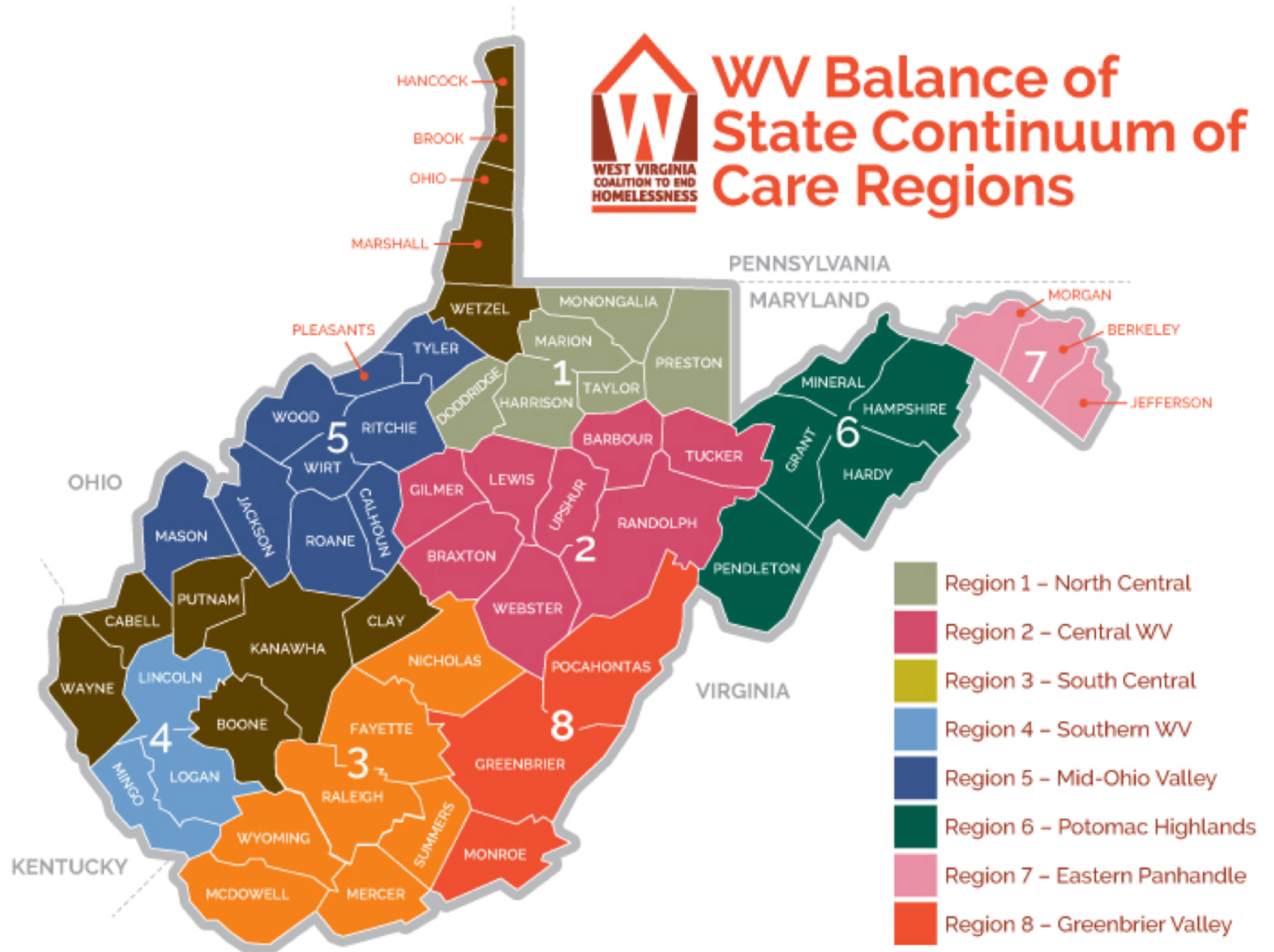
- Hold meetings of the membership
- Develop performance targets and monitor projects on these targets and HUD regulation compliance
- Plan and conduct the PIT Count
- Plan for the CoC homeless needs and services
- Report to HUD on CoC Performance measures
- Facilitate the application to HUD for CoC funding in the geography

## In partnership with the Emergency Solutions Grant (ESG) Recipient:

- Develop a centralized/coordinated entry system
- Monitor recipients in consultation with the ESG Recipient
- Plan for allocating the ESG funding in the geography
- Develop written standards for assistance under the CoC, Transitional Housing, Rapid Rehousing, and PSH.

## Designate and operate an HMIS

# WV BoS CoC Service Area Map



# Housing First Principles

- Housing first is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry (e.g. sobriety, treatment, or service participation requirements).
- Supportive services are offered, and encouraged, but not required, to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.
- Housing First Assessment Tool:  
<https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/>

# Uplifting Equity in Services

- Promoting Authentic Collaboration of Persons with Lived Experience
- Cultural Competency and Trauma Informed Care training for staff, program participants and larger community
- Avoiding Tokenism
- Promoting Racial Equity in policy and practice
- Designing programs to meet the needs of LGBTQ+ population
- Advocating for Disability Rights
- Outreach to historically underserved, rural areas
- Additional resources:
  - <https://www.hudexchange.info/resource/5787/coc-analysis-tool-race-and-ethnicity/>
  - <https://www.hudexchange.info/trainings/courses/coordinated-entry-as-a-tool-for-equity/>



# Non-Discrimination & Equal Access

- **Fair Housing Act** prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- **Title VI of the Civil Rights Act** prohibits discrimination on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance.
- **Section 504 of the Rehabilitation Act, Title II of the Americans with Disabilities Act, & Title III of the Americans with Disabilities Act** are federal nondiscrimination laws provide housing protections for individuals with disabilities.
- **HUD's Equal Access Rule** at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status.
- **Age Discrimination Act** prohibits discrimination because of age in programs or activities receiving Federal financial assistance.
- **Personal Responsibility and Work Opportunity Act of 1996 (PRWORA) and HUD's Homeless Assistance Programs.** Congress restricted immigrant access to certain federal public benefits, but also recognized exceptions to protect life or safety, based on a 3-part test. Majority of CoC funded programs fall under the exception, for more information: <https://www.hudexchange.info/resources/documents/PRWORA-Fact-Sheet.pdf>

# Evaluating Project Performance

- Participation in CES and CoC planning efforts
- Housing First Assessment Tool
- Equity of Services Evaluation
- Inclusion of persons with lived experience in decision-making and feedback on project performance
- Maintaining HUD compliance
- Reducing overall homelessness in your community
- Coordination with community resources and connecting households to appropriate services
- Long-term housing stability of households served

# Evaluating System Performance

- HUD System Performance Measures (SPM):
  - Enhance diversion efforts to reduce first time homelessness
  - Reduce unsheltered homelessness
  - Reduce length of time people experience homelessness
  - Increase access to mainstream resources and income opportunities
  - Increase exits from the homeless system to permanent housing
  - Reduce returns to the homeless system
- For more information on HUD SPMs:  
<https://www.hudexchange.info/programs/coc/system-performance-measures/#guidance>

# HUD Homelessness Definition

## **Category 1 – Literally Homeless**

- Sleeping in a place not meant for human habitation
- Living in a shelter, transitional housing, or hotel/motel PAID FOR by a charitable organization
- Exiting an institution where the person resided 90 days or less and was homeless immediately before entering the institution.

## **Category 2 – Imminent Risk**

- Will lose their primary residence within 14 days AND no other residence has been identified AND they lack the resources necessary to obtain permanent housing.

## ***Category 3 – Homeless Under other Federal Statutes.***

**Category 4 – Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or life-threatening situations that relate to violence (e.g. Human Trafficking).**

*Some of the following information in the project types and eligible costs section was provided from a previous Pittsburgh Field Office CoC Start Up Training and HUD Exchange CoC Virtual Binder. The views, opinions, and content expressed in this presentation do not necessarily reflect the views or opinions of the US Department of Housing and Urban Development.*

## Project Types funded under CoC

For the purpose of today's discussion:

- Permanent Supportive Housing (PSH)
- Rapid Re-Housing (RRH)
- Transitional Housing (TH)-RRH joint component

Other project types funded under the CoC:

- HMIS (*HMIS Lead Agency only*)
- Supportive Service Only (SSO)-Coordinated Entry System (CES) (*CES Lead Agency only*)
- Planning (*CoC Lead Agency only*)

*\*SSO-non CES (e.g. Street Outreach) is funded under the Youth Homelessness Demonstration Program only.*

# PSH

- Long-term housing assistance where supportive services are provided to assist individuals or families experiencing homelessness with a disability to live independently.
- Ideally, many of the program participants will move along from PSH to mainstream housing within 3 years, but some may need longer support and remain in PSH for several years.
- Assistance can only be provided to individuals and families experiencing homelessness in which the head of household has a disability.
- Case management should be offered frequently (at a minimum weekly) to PSH program participants and tailored to each household's individual needs as they work toward housing stability.

## PSH cont.

- Dedicated Permanent Supportive Housing projects are required to serve 100% chronically homeless individuals and families.
- In FY 2017, HUD introduced the concept of DedicatedPLUS which allows recipients of PSH funding to serve households experiencing chronic homelessness as well as households who are highly vulnerable but not currently experiencing chronic homelessness.
- Leasing (if scattered site), Operations, Supportive services, HMIS and Project administrative costs are eligible costs under this project type.



# DedicatedPLUS Eligibility

Participants must meet at least one of the following criteria at intake:

- Experiencing chronic homelessness as defined in 24 CFR 578.3;
- Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- Residing in a place not meant for human habitation, emergency shelter, or safe haven and does not currently meet the definition of chronically homeless, but did prior to entering a permanent housing project in the last year which they were unable to maintain;

## DedicatedPLUS Eligibility cont.

- Residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- Residing and had resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

# RRH

- Tenant-based rental assistance for short term, up to 3 months or medium term, up to 24 months. *This time limit may be extended for up to 36 months for YHDP projects who have included this special activity in their approved costs.*
- Supportive services to assist program participants to obtain and maintain stability in permanent housing.
- Rental assistance, Supportive services, HMIS and Project administrative costs are eligible costs under this project type.
- Requirement in the regulation to meet once monthly with the case manager. *This is a minimum requirement, and the WV BoS CoC encourages weekly visits that is tailored to the needs of each household as they work toward housing stability.*

# RRH Eligibility

Projects awarded RRH funding may serve individuals and families who meet the following criteria:

- persons meeting the criteria of Homeless Categories 1, 2, and 4 discussed in previous slides;
- transitional housing project that was eliminated;
- residing in transitional housing funded by a Joint TH and PH-RRH component project; or
- receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

*\*Program participants receiving RRH may maintain their homeless or chronically homeless status if they were homeless or chronically homeless at entry into the project for purposes of remaining eligible for other permanent housing placements (including CoC funded PSH).*

# TH-RRH

Traditional TH Component (*must be coupled with the RRH component and not as a standalone project*):

- Facilitates the movement of individuals and families experiencing homelessness to permanent housing within 24 months.
- Program participants must have a lease, sublease, or occupancy agreement for a term of at least one month, that ends in 24 months.

## TH-RRH cont.

### TH-RRH:

- Combines two existing program components TH & RRH in a single project to serve individuals and families experiencing homelessness.
- Project must offer RRH for participants in TH.
- Eligible costs are limited to:
  - Operating, leasing, and capital costs to provide TH
  - Short or medium term tenant based rental assistance for RRH
  - Supportive services, HMIS and Project administrative costs are eligible costs for both types of assistance

# TH-RRH Eligibility

Projects awarded RRH funding may serve individuals and families who meet the following criteria:

- Persons meeting the criteria of Homeless Categories 1, 2, and 4 discussed in previous slides;
- Residing in a TH project that is being eliminated;
- Residing in TH being funded by another Joint Component project; or
- Receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system

# Accessing the Homeless Services System

- HUD requires all designated CoC's to establish a Coordinated Entry System (CES) designed to coordinate program participant intake, assessment, and provision of referrals.
- The CES must cover the entire geographic area served by the CoC.
- The CES must be easily accessed by all population groups seeking housing and services.
- The CES must be well advertised.
- The CES must include a comprehensive and standardized assessment tool.
- The CES must ensure confidentiality measures are in place for survivors to ensure equal access of housing resources in the community of their choice.



## System Access Points

- Coordinated Entry Intake Line 304-842-9522 x1 and CES email [ces@wvceh.org](mailto:ces@wvceh.org) (*operated by WVCEH staff*)
- Emergency Shelters and Domestic Violence Shelters. *This also includes a hotel/motel paid for by a charitable organization.*
- Street Outreach
- Supportive Services for Veteran Families

# Responsibilities of System Access Points

## **Access Points: CES, Outreach, Emergency Shelter, and SSVF**

- Participate in Regional Prioritization calls
- Communicate with CES to assist with emergency housing resources when needed
- Identification of youth who are at-risk and homeless
- Connection to safe temporary housing and ultimately permanent housing
- Determining program eligibility
- Assisting with gathering vital documents
- Housing search and location
- Referral to permanent housing program (CES ONLY)

# Responsibilities of Housing Providers

## **Housing Providers: RRH, TH-RRH, PSH, other PH**

- Participate in Regional Prioritization calls
- Communicate vacancies with CES
- Accept Housing Referrals from CES
- Coordination with Access Points for warm hand-off
- Housing search and location
- Tenancy education
- Connection to Education/Employment and other Mainstream resources
- Budgeting
- Crisis Planning

# Utilizing HMIS for Client-level Documentation

HMIS is a client-level database utilized to track the following:

- Intakes (System Access)
- Eligibility Documentation and ROIs
- Prioritization and Referrals
- Project Enrollment and Move-In
- Program Participant services, resources connection, and financial assistance
- Project Exit Destinations
- Utilization rates

HMIS is also utilized to track annual project performance for monitoring and system-wide (CoC-wide) performance to evaluate the effectiveness of system response and determine future resource allocation.

Victim Services Providers are not permitted by law to enter data into HMIS, but must capture HUD-required data for annual reporting in a comparable database.

# Documentation of Eligibility for Literally Homeless (Category 1)

## Documentation types in order of preference:

1. Third-party documentation first (e.g. a letter on agency letter head with specific dates of contact)
2. Intake worker observations second (e.g. a letter on agency letter head and/or form with intake worker signature documenting specific dates of contact; intake worker may include pictures in case file of where household is sleeping, if authorized to do so by household)
3. Certification from the person seeking assistance third (e.g. when no other documentation can be obtained and client completes and signs form documenting homeless status/dates they experienced homeless)

## Already available documentation:

- Discharge paperwork (e.g. paperwork when discharged from institutionalized setting where they resided less than 90 days, such as jail, hospital, treatment facility, etc.)
- HMIS record (may include any of the follow: current project enrollment/shelter stay, recent outreach contact, recent service transactions)

## Documentation of Eligibility for Imminent Risk (Category 2)

Documentation types in order of preference:

1. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; **or**
2. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; **or**
3. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; **and**
4. Certification that no subsequent residence has been identified; **and**
5. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

# Documentation of Eligibility for Fleeing/ Attempting to Flee DV (Category 4)

Documentation types in order of preference:

*For victim service providers:*

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

*For non-victim service providers:*

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; **and**
- Certification by the individual or head of household that no subsequent residence has been identified; **and**
- Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

## Youth who are “Living in Unsafe Situations”

As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services. Additionally, any youth-serving provider funded by the CoC or serving as a youth access point may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence. These youth-related requirements supersede any conflicting requirements under this policy.



# Chronic Homelessness

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
  - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, **and**
  - Has been homeless and living as described for at least 12 months\* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; **or**
- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
- A “break” in homeless is considered to be 7 or more nights.
- An individual residing in an institutional care facility does not constitute a break in homelessness.

# Documentation of Length of Time for PSH

Documentation of current homeless status resources/forms (see previous slides):

- <https://wvceh.org/guidance/>
- <https://wvceh.org/monitoring/>

Order of Priority for documenting of Length of Time homeless:

1. Third party documentation of each month they encountered the client,  
**or**
2. Intake Worker observation (*Program participants may certify 3 of the 12 months*)
3. Length of Time Documentation Resources/Forms:
  - <https://wvceh.org/monitoring/>
  - <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/recordkeeping-requirements/>

## Documentation of Length of Time for PSH cont.

When there are no households who have the documented length of time homelessness in the CoC region where the household would like to be housed, the CoC's CES must then follow the Order of Priority for prioritizing PSH units and offer housing to the next most vulnerable household on the list.

1. All PSH client files should include a letter from CES stating this was the next household to be housed in PSH in that CoC region.
2. CES maintains a copy of the housing prioritization guide on the date of the referral.
3. All households referred to PSH must include a household member with a disability.
  - <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/determining-and-documenting-disability/disability-definition/>
  - <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/order-of-priority/>

# Documentation of Disabling Condition for PSH

## Order of Priority for documenting Disabling Condition:

- Evidence of diagnosis with one or more of the following conditions; substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability, must include one of the following forms of documentation:
  1. Written verification of the condition from a professional licensed by the state to diagnose and treat the condition;
  2. Written verification from the Social Security Administration;
  3. Copies of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation); **or**
  4. Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days of the application for assistance and accompanied with one of the types of evidence above.

## Documentation of Disability Resources/Forms:

- <https://files.hudexchange.info/resources/documents/Overview-of-DedicatedPLUS-Eligibility-and-Recordkeeping-Requirements.pdf>
- <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/determining-and-documenting-disability/>

# Other Eligibility Documentation

- Proof of Identification
  - ID
  - Birth certificate
  - Social Security card
  - Other temporary forms of verifications:
    - Verification from another service provider
    - SNAP or Medicaid card
    - Verification from DHHR that the youth was in foster care
- CES, Street Outreach, and Emergency Shelters should assist with gathering eligibility documentation.
- CoC/YHDP programs are required to have documentation of eligibility in their client files for review. Documentation should be gathered within 45 days.
- Proof of income is NOT required at intake, but it is necessary for budgeting and determining program participant's rent contribution.
  - For a comprehensive overview of how to determine income and calculate rent for PSH and TH, please review [Section 5.609 and 5.611\(a\)](#) and [Section 578.77](#) of the CoC Program Interim Rule.
  - RRH projects must follow their CoC's written standards for determining the amount or percentage of rent that each participant may pay. The CoC Program Interim Rule outlines the specific requirements of RRH ([§ 578.37\(a\)\(1\)\(ii\)](#)).

# Releases of Information

- HMIS ROI: Required form can be found on WVCEH website <https://wvceh.org/monitoring/>
- Agency ROI: Sample can be found on WVCEH website <https://wvceh.org/monitoring/>
- Any other pertinent ROIs for exchange of information for continuity of care
- What about ROIs for when a youth is under 18?
  - Unaccompanied minors may disclose their personal information that can be collected in HMIS. However, they CANNOT consent to share their information, so these records must be locked down.
- Mutual expectations and agreement between case manager and program participant

# Housing Search & Tenant Rights Education

- Unit search and landlord engagement
- Fair Housing education: [Distribute booklet](#) *(or condensed brochure from HUD website)*
- Lead-based Paint education: [Distribute pamphlet](#)
- Review lease requirements, and tenant rights and responsibilities

# Move-In Documentation and Housing Inspections

- Fair Market Rent (FMR) vs. Rent Reasonableness (RR)
  - Calculating FMR/RR: <https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>
  - HUD Fair Market Rent by County: <https://www.huduser.gov/portal/datasets/fmr.html>
  - Utility Allowances from local Public Housing Authority
- Housing Quality Inspections
  - <https://www.hud.gov/sites/dfiles/OCHCO/documents/52580A.PDF>
- Lead-based Paint Inspection
  - Staff training: <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>
- Reviewing and signing the lease with clients (*must be a 12-month lease or sublease, unless a waiver or Special Activity has been approved to sign leases for less than one year. TH components of TH-RRH projects allow for month to month leases.*)
  - [VAWA Lease Addendum](#)
- Rental Agreement with client and landlord
  - Sample on WVCEH website: <https://wvceh.org/monitoring/>



# Documenting Housing Stabilization Services in Client Files

- Connection to Healthcare, Behavioral health, Education/Employment, Disability benefits, and Mainstream benefits
- Budgeting to determining program participant's rent portion and keeping record of agency/program participant's monthly payments
- Mitigating Tenancy issues
- Utilizing the Full SPDAT and other evidence-based case management tools
- Crisis planning
- Developing guest policies when appropriate
- Community support and connection
- Positive exits to mainstream housing
- Long-term stability: Reducing returns to homelessness
- Annual reviews for clients enrolled in a housing program longer than a year

## Eligible vs. Approved Costs

| Eligible                                           | Approved                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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>• Recipients 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, unless the change represents less than 10% of the budget line item.</li></ul> |

# Leasing Costs

## Eligible Cost under PH: PSH, TH, & SSO

- Funds to pay rent on structures or individual units to provide supportive housing or supportive services.
- Grants may be used to pay 100% of the costs of leasing an individual unit or structure.

### Eligible Costs:

- Security deposits
  - Up to two month's rent
- First and last month's rent of an individual unit
- Recipient may pay rent on vacant units until a new program participant moves in.

# Operating Costs

## Eligible Cost under PH: PSH & TH

- Costs associated with the day-to-day physical operation of housing in which program participants are housed.
- Eligible costs:
  - Grant may fund staff and overhead costs directly related to carry out the following activities:
    - Maintenance and repair of housing
    - Building security
    - Property tax and insurance
    - Electricity, gas & water
    - Furniture
    - Equipment
  - Day-to-day operation of the supportive service-only facility (maintenance, repair, building security, furniture, utilities and equipment) are eligible as a supportive service
- Ineligible costs:
  - Rental assistance and operating in the same unit
  - Emergency shelter or supportive services-only facilities
  - Maintenance and repair costs that are included in the lease

# Rental Assistance Costs

## Eligible Cost under PH & TH

- Funds to pay part, or all when necessary, of the rent for a unit for eligible households.
- Assistance may be:
  - Short: less than 3 months
  - Medium: 4-24 months
  - Long: 24 months
- Assistance may be tenant-based, sponsor-based or project-based

### Eligible Costs:

- First and last month's rent
- Security deposits (up to 2 months rent)
- Property damages (up to 1 month and only once) –NOT RRH
- Vacancy payments (up to 30 days – less than 90 days in an institution does not equal vacancy).
- Processing rental payments to landlords
- Examining participant income and family composition
- Providing housing information and assistance
- Inspecting units for compliance with housing quality standards
- Receiving new participants into the program

# Supportive Services Costs

## Eligible Cost under PH, TH & SSO

- Address the needs of program participants to help with obtaining and maintaining housing.
- In general, grant funds may be used only on those services listed in the CoC Program interim rule (578.53):
  - Assessing service needs
  - Moving costs
  - Case management
  - Childcare
  - Education services
  - Employment assistance & job training
  - Food (no longer an eligible operating cost)
  - Housing search & counseling services
  - Legal services
  - Life skills training
  - Mental health services
  - Outpatient health services
  - Outreach services
  - Substance abuse treatment services
  - Transportation
  - Utility deposits
- For supportive services that are directly delivered by grantee staff to program participants, the following costs are eligible:
  - Labor, supplies and material costs incurred to deliver the services
  - Salary and benefits of the staff person delivering the service

*\*Keep match in mind*

# HMIS costs

- Any project may have an HMIS budget line item for costs associated with HMIS data collection.
- Eligible HMIS data collection costs:
  - Purchasing or leasing computer hardware, software and/or software licenses
  - Leasing office space, equipment, furniture, and utilities for HMIS activities
  - Salaries, operating costs, and duties as required to operate an HMIS
  - Trainings related to the use of HMIS
  - Reporting to CoC on HMIS

# Administrative costs

## Eligible Cost under ALL Components

- Project administration funds can be used to conduct:
  - General management (e.g. case management supervision), oversight and coordination,
  - Training on CoC requirements, and
  - Environmental reviews:
    - Exemption form must be completed every 5 years unless a full Environmental Review is required for acquisition, rehab or new construction.
    - For project operating in the WV BoS CoC that are not in an entitlement community, you will need to complete the form and send it to Jennifer Ferrell ([Jennifer.L.Ferrell@wv.gov](mailto:Jennifer.L.Ferrell@wv.gov)) at the WVDO.
    - For projects operating in an entitlement community, your local city government can sign this form.
    - Submit all Environmental Review Forms to the Pittsburgh HUD Field Office.
- Costs of carrying out other eligible activities should be charged to those budget line items, NOT project administration.



# New FY23 Budget Line Item: VAWA Costs

## VAWA Costs Budget Line Item

- Facilitating and coordinating activities to ensure compliance with [the emergency transfer plan requirement in 34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections of [the confidentiality requirement in 34 U.S.C. 12491(c)(4)].
- HUD has determined that this new eligible activity category is not subject to the CoC program's spending caps on administrative costs under section 423(a)(10), (11), and (12).
- This activity may be included in new project applications. It may also be added to eligible renewal projects through expansion or added to eligible renewal projects by shifting up to 10 percent of funds from one eligible activity to the VAWA costs line item.
- Examples of eligible costs under emergency transfer facilitation and monitoring compliance with VAWA can be found on pages 42 & 43 of the FY23 CoC NOFO.

# New FY23 Budget Line Item: Rural Costs

## Rural Costs Budget Line Item

- Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amends section 423(a) of the McKinney-Vento Homeless Assistance Act to include activities that address barriers to transitioning families in rural areas to permanent housing and additional activities to increase capacity to address the unique challenges CoCs face when serving people experiencing homelessness in rural areas.
- HUD has determined that this new eligible Rural cost category may be included in new project applications or added to eligible renewal projects through expansion.
- HUD will publish a list of CoCs located in rural areas as defined in section I.B.2.b.(26) of FY23 CoC NOFO.
- Examples of eligible costs under the rural costs line item can be found on page 43 of the FY23 CoC NOFO.

# Uniform Administrative Requirements

- The 2 CFR Part 200 Uniform Administrative Requirements apply to the competitive CPD program grants including the CoC Program. Standards for 2 CFR Part 200 include:
  - Financial Management
  - Internal Controls
  - Payment
  - Matching
  - Program Income
  - Property Standards
  - Procurement
  - Record Retention (5 years after grant close out, 15 years after first occupation by participants)
- The Uniform Requirements with all amendments to 2 CFR part 200 are available in the electronic Code of Federal Regulations at [www.ecfr.gov](http://www.ecfr.gov) .
- CPD Notice 16-04: Transition and Implementation Guidance
- 2 CFR Part 200 Overview for HUD Grantees:  
<https://www.hud.gov/sites/documents/CFR200.PDF>

# Indirect Costs

- Direct Costs – costs that can be identified specifically with a particular cost objective e.g. Case Manager salary, food for participants, rental assistance for clients
- Indirect Costs – costs incurred for a common purpose that benefits more than one program e.g. office rent, utilities, equipment
- Grantees who intend to charge indirect costs to the CoC grant must indicate this on the last page of the grant agreement
- Methods for charging indirect costs:
  - 10% De Minimis Rate – allows smaller agencies who did not typically charge indirect costs to recover some indirect costs; computed by the agency, limited to 10%.
  - Indirect Cost Rate Agreement – allows recipients/subrecipients to charge more for indirect costs based on the actual indirect cost rate, must prepare/submit an indirect cost plan, plan must be negotiated/approved by the Federal cognizant agency, good for three years.
  - Cost Allocation Plan – allows recipients to ensure all costs are charged and paid for all grants, must prepare and submit a cost allocation plan and cost policy, requires CPA to prepare, requires more complex accounting system, must be reviewed and approved by Federal cognizant agency.
- For more information on Indirect Costs:  
<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/indirect-costs/>

# CoC Match

- CoC project applicants are required to match all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources. This partnership and/or contribution should be outlined through an MOU.
- Applicants may use funds from any source, including any other federal sources (excluding CoC funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match.
- Applicants may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D of 24 CFR 578 (CoC Interim Rule).

# Match Documentation

- New projects must document formal match agreement (e.g., MOU for in-kind) prior to grant agreement. Renewal projects must provide it to the field office upon request.
- If recipient needs to change its in-kind matching source, the match agreement must be in place before a new source can be counted as match.
- Must demonstrate match is spent on eligible activities and incurred within the grant period.
- Must keep source documentation (e.g., MOU) on file for review when needed.
- For more information on CoC Match Requirements:  
<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-match/coc-match-overview/>

# Cash Match Documentation

- Cash match should be substantiated with written documentation provided on the source agency's letterhead, signed, and dated by an authorized representative.
- Documentation must include:
  - Amount of cash to be provided for the project
  - Specific date the cash will be made available
  - Actual grant and fiscal year to which the cash match will be contributed
  - Allowable activities to be funded by the cash match
- Unrecovered Indirect Costs can be used for match

# In-Kind Services Match Documentation

- In-kind donations must be substantiated with written documentation provided on the source agency's letterhead, signed, and dated by an authorized representative.
  - An MOU for In-kind Services must be in place prior to provision of the service.
- Documentation must include:
  - Description and value of the donated goods
  - Specific date and grant (including fiscal year) for which the goods will be contributed
  - Method used to determine the value of the donation



# CoC Leveraged Costs

- Leverage is the non-match cash or non-match in-kind resources committed to making a CoC Program project fully operational. This includes all resources in excess of the required 25 percent match for CoC Program funds as well as other resources that are used on costs that are ineligible in the CoC Program.
- Leverage funds may be used for any program related costs, even if the costs are not budgeted or not eligible in the CoC Program. Leverage may be used to support any activity within the project provided by the recipient or subrecipient.
- All CoC/YHDP funded projects are encouraged to leverage both community healthcare and mainstream housing resources. All projects funded from FY22 and after are required to leverage both healthcare and housing resources through a written commitment of value, dates of service, number of units/type of service provided.

# CoC Program Income

- Program income is the income received by the recipient directly generated by a grant-supported activity. Some examples include :
  - Income from fees for services performed
  - Rent and occupancy charges paid directly to the recipient by program participants
- Rent funds received from PSH or TH program participants are considered to be program income under Section [24 CFR 578.97](#) of the CoC Interim Rule.
- Occupancy charges collected from residents of transitional housing may be reserved to assist the residents move into permanent housing ([§ 578.97\(c\)](#)).
- Funds from Program income must be spent on any CoC eligible cost under Part D of the CoC Interim Rule.
- Recipient records should include:
  - Rent receipts
  - Method for tracking and expending program income on CoC eligible costs within the grant term

# Project Changes

- Significant changes require HUD approval through a formal grant agreement:
  - Change of recipient
  - 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
  - Change of project site
  - Additions or deletions in the types of eligible activities approved for a project
- For significant changes, recipients should:
  - Prepare a detailed, written request to the local HUD CPD Field Office
  - Explain the reason for the change
  - Justify same or better level of service will be provided
  - Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

*\*\*Note: Discuss the amendment with the CoC Lead before submitting.*

# Annual Performance Reporting (APR)

- Each CoC/YHDP funded project is required to submit an APR annually.
  - Project performance data is exported from HMIS (*This is why accurate data entry is VERY important!*)
  - Inputting data into the Sage Repository:  
<https://www.sagehmis.info/logon.aspx?ReturnUrl=%2fsecure%2fclientreview%2fclientreview.aspx%3fcid%3d101955%26iid%3d109031&cid=101955&iid=109031>
  - APR is due within 90 days from the end of the grant year

# Program Monitoring

CoC/YHDP projects are monitored annually and projects will be rated and ranked based on performance during the CoC Funding Competition.

1. Overall Grant Management
  - Environmental Review or Exemption form (every 5 years)
  - Policies and Procedures (CoC will work with YHDP funded agencies to develop specific policies for youth programs)
2. Client Eligibility and Documentation Requirements
3. Project Specific Requirements and Quality of Services
  - TH-RRH
  - RRH
  - SSO- non CES
  - SSO- CES
  - HMIS

## Program Monitoring cont.

4. Financial Management, Eligible Costs, Match Requirements, and Timely Expenditures
  - Leasing (TH only)
  - Rental Assistance (RRH only)
  - Supportive Services (SSO, RRH, and TH-RRH)
  - Operations (TH only)
  - HMIS (HMIS Lead Only, except cost of licensure for funded agencies)
5. Project Performance vs. System Performance
6. Program Participant Feedback

# For new projects, where do we start?

- Review monitoring policies, sample client file forms, and links to best practices resources on the WVCEH website under the CoC monitoring tab.
- Be sure to create a HUD exchange account to get information on upcoming HUD training.
- Develop program policies that align with CoC Interim Rule: 24 CFR 578 and Uniform Administrative Guidance: 2 CFR Part 200.
- Create a client intake packet
- Connect new staff with HMIS Help Desk (or with comparable database administrator for access to and training on HUD-required data entry
- Reach out to partners that leveraged cost to inform them of project start date and coordinate a referral process. The CoC can assist with this, so please reach out.
- The CoC will offer trainings throughout the year, so be sure to check your emails and forward this information to appropriate staff.

# Additional Resources

- Client File Forms/Templates (WVCEH website): <https://wvceh.org/monitoring/>  
*\*Please note that some of these forms will be updated in late 2024-early 2025 following the FY24 CoC NOFO and release of new inspection standards\**
- CoC/YHDP funded Agency Policy Checklist: [https://docs.google.com/document/d/1u1YKl5QJk4ksD6U3zQ1i5SLYnRIQSI\\_u/edit?pli=1](https://docs.google.com/document/d/1u1YKl5QJk4ksD6U3zQ1i5SLYnRIQSI_u/edit?pli=1)
- CoC Program Interim Rule: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>
- Uniform Administrative Requirements: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>
- HUD Exchange CoC Virtual Binder: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/>
- WV BoS CoC Program Guidance: <https://wvceh.org/guidance/>
- SOAR: <https://soarworks.samhsa.gov>
- NAEH: <https://endhomelessness.org/>
- United States Interagency Council on Homelessness: <https://www.usich.gov/>



Questions?

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