

Agency:

Project Monitored:

Grant Number:

Monitoring Date:

Contract Year Monitored

Total Grant Amount:

Number of Households Served PIT:

Type of Funds:

Program Type:

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Grantee Monitoring Tool & Guide - updated 6/27/17

1) Using this document

- This document will be used during monitoring visits and includes all requirements that will be monitored.
- Embedded in the tool is guidance regarding HUD and VC CoC requirements. This guidance is intended to help CoC/ESG program recipients and subrecipients to maintain compliance with requirements and prepare for VC CoC and HUD monitoring.
- Sections 1 to 9 apply to all CoC and ESG funded programs. There are additional compliance sections for CoC versus ESG, specific to each program type.
- As we learn from the monitoring process about what is most helpful to recipients/subrecipients, CoC staff will make adjustments to the document.

2) Document assembling and review

Prior to monitoring—obtain or request the following documents from grantee:

- Most recent Annual Performance Report (APR) or CAPER
- List of all participants served in the past 12 months, including admission data and discharge date (HMIS identifier only)
- List of all applicants declined for admission in the past 12 months (unique identifier only)
- Two most recent drawdowns or invoices.
- Most recent close out certification executed by HUD and your agency
- List of all staff paid for by grant funds with job descriptions (name, title and % FTE billed)
- Written agency-specific policies and procedures including:
 - Confidentiality policy
 - Conflict of interest policy
 - Eligibility and intake requirements for the program being monitored
 - Intake policy for the program being monitored_(including all documents provided to participants and all documents participants must sign)
 - Non-discrimination policy of grantee
 - Service planning policy for the program being monitored
 - Client assessment policy for the program being monitored
 - Procurement policies
 - Agency Code of Conduct
 - Release of Information forms provided to and completed by program participants
- Accounting policy and procedures including:
 - Procedures for recording financial transactions
 - Written guidelines for authority to approve financial transactions
 - Guidelines for controlling expenditures including purchasing requirements and travel authorizations
 - How accounting records are to be maintained

Upon arrival to the site, monitors may request the following:

Please refer to program specific section of this monitoring guide for detailed guidelines on documentation required.

If applicable, monitors will request access to the following: leases/occupancy agreements, most recent rent calculations, environmental reviews, documentation of rent reasonableness, documentation of HQS inspections, and documentation of Lead Based Paint Visual Inspections. Additionally, should the monitoring identify issues with the client charts under review, the monitors may seek to review additional charts to determine the pervasiveness of the issue.

- Charts of 20% of currently enrolled in and/or recently discharged from the program including at least one participant discharged in the past 12 months and one participant admitted in the past 12 months. (if applicable)

3) Visual Observation

- 1) Are financial records secured in limited access area?

- Yes
- No

Guidance: Recipients shall adequately safeguard all such assets and assure they are used solely for authorized purposes

Reviewer Comments:

- 2) Are client files maintained in a confidential manner?

- Yes
- No

Guidance: Recipients shall adequately safeguard charts and assure they are used solely for authorized purposes. Reviewer will look for evidence of locked charts and for proper safeguarding of client names and other confidential materials (578.103(b) Confidentiality).

As required by 24 CFR 91.325(c)(3) and 24 CFR 576.500(x), the recipient shall ensure the confidentiality of records pertaining to any individual provided family-violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family-violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Reviewer Comments:

3) Drug free work place statement:

- Yes
- No

Guidance: Agency must have a drug free work place statement that complies with the requirements of 24 CFR 21.200 and has been posted in an area visible to all employees engaged on the CoC award.

Reviewer Comments:

4) Physical Location (Housing or Shelters)

- A. Residents have adequate space with an acceptable place to sleep
 - Yes
 - No
- B. Rooms have natural or mechanical ventilation
 - Yes
 - No
- C. Residents have access to sufficient sanitary facilities
 - Yes
 - No
- D. Heating and Cooling is adequate/in working condition
 - Yes
 - No
- E. Electricity/Illumination is adequate
 - Yes
 - No
- F. Space/Equipment to store and prepare food in a sanitary manner is suitable
 - Yes
 - No
- G. Smoke detector is present on each occupied level of unit
 - Yes
 - No
- H. Public areas have sufficient smoke detectors
 - Yes
 - No
- I. Housing is maintained in a sanitary condition
 - Yes
 - No

Guidance: Items above are intended to inform a brief review of physical plant conditions. All housing assisted through leasing or rental assistance with CoC funds must include a housing inspection checklist and be re-inspected at least annually using HUD Housing Quality Standards (see Section E #32)

Reviewer Comments:

4) Required Match

1) Is the required match met?

CoC Funded: Must be matched by at least 25% of funds or in-kind contributions from other sources (578.53(a))

ESG Funded: Require a 100% match of funds, in-kind services, or a combination of both (576.203(b)).

- Yes
 No

Guidance: Agency must demonstrate by cash receipt in accounting records or MOU as specified below for in-kind that the required match was met for the program year being monitored.

Reviewer Comments:

2) In-Kind Match MOU - If the match has been met in whole or in part by service provided by a third party, is there a MOU that indicates: the hourly rate for the service (must be consistent with those paid for similar services); specific service to be provided; and profession of persons providing the service (578.73(c)(3))

- Yes
 No

Reviewer Comments:

3) Eligibility of Match - If match is met by in-kind contributions, would the services, goods equipment, real property that is providing the match have been an eligible expense under Subpart D of the HEARTH CoC program? (578.73(c)(1))

- Yes
 No

Guidance: For each component type (e.g. Rental Assistance, Supportive Services, Operating) eligible activities are defined in Subpart D of the HEARTH Interim Rule. Match must be used only for eligible activities. See Appendix 1

Reviewer Comments:

- 4) Documentation of in-kind match - Does the grantee have documentation of the service hours provided where these hours are used as in-kind match?
(578.73(c)(ii))
- Yes
 No

Guidance: Volunteer services shall be documented and, to the extent feasible, supported by the same methodology used by the recipient for employees; the basis for determining the value of personal services must be documented.

Reviewer Comments:

- 5) Documentation of Leverage - Does the grantee have the required documentation of leveraging as defined in the NOFA under which the project was funded?
- Yes
 No

Guidance: Commitment letter(s) on file that are dated and demonstrate the minimum required amount of leveraged funds. A written commitment letter may include signed letters, memoranda of agreement, or other documented evidence of a commitment. All written commitments must be signed and dated by an authorized representative, and should include the name of the contributing organization, the type of contribution (cash, case management, etc.), the value of the contribution, and the date the contribution will be available. It is also important that the written commitment include the project name and be addressed to the project applicant or subrecipient.

Reviewer Comments:

5) Administrative costs and requirements

- 1) Administrative fee - Review APR and grant application for amounts requested for administrative expenses. Calculate the percentage that administrative costs represent of the total grant.
Percent of administrative funding _____

Reviewer Comments:

- 2) Eligibility of Administrative Costs - If administrative funds are used for general management, oversight and coordination, has the grantee included the entire salary, wages and related costs of persons whose primary activity is program administration or has it pro-rated the share of time of each person whose job includes any administrative function. Has the grantee used only one of these methods for each fiscal year? [578.89(a)(1)]
- Yes
 - No

Reviewer Comments:

- 3) Allocation of Administrative Costs: Have administrative costs been allocated to the following eligible activities: general management, oversight and coordination including travel costs associated with monitoring, contracts for legal, accounting or audit services; costs for good and services required for administration of the program including equipment rental and purchase, insurance, utilities, supplies, rental and maintenance of office space; Training on Continuum of Care requirements [providing or participating in HUD sponsored training]; or Environmental review [578.59(a)]

Guidance: Reviewers will request a report showing administrative expenses drawn down and expended during the contract period.

Reviewer Comments:

- 4) Staff eligibility for administrative costs - Does a randomly selected review of administrative personnel costs reveal that staff paid from program funds are working on eligible funded activities? [578.59]
- Yes
 - No

Guidance: If personnel costs are assigned to administration, reviewers will look for back up (e.g. time sheets) that shows staff was working on administrative activities for the time billed.

Reviewer Comments:

6) Homeless Participation

Does the grantee meet the participation requirements? (Each grantee and sub-grantee must have at least one homeless or formerly homeless individual on the board of directors or equivalent policy making entity. Each grantee and sub-grantee must to the maximum extent practicable involve homeless people through employment or volunteer services.) [578.75(g)]

- Yes
 No

Reviewer Comments:

7) Nondiscrimination and equal opportunity requirements

Does the project comply with the nondiscrimination and equal opportunity requirements set forth in 24CFR 5.105(a)? [578.93(a)]

- Yes
 No

Reviewer Comments:

8) Financial Management

1) Internal Controls: Do the fiscal records indicate that the grantee has effective internal control over, and accountability for, all grant funds, property and other assets? [84.21(b) and 85.20 (b)]

- Yes
 No

Reviewer Comments:

2) Recording of expenses: Do the grantees accounting records identify expenditures according to eligible activities? [578.37-578.59]

- Yes
 No

Reviewer Comments:

- 3) Expenditure eligibility: Randomly select financial transactions. Does a review of these transactions reveal that expenditures were for eligible costs and that the transactions were supported by adequate source documents? [578.37-578.59; 84.21(b) and 85.20(b)]

- Yes
 No

Guidance: for each component type (e.g. Rental Assistance, Supportive Services, Operating) eligible activities are defined in Subpart D of the HEARTH Interim Rule. See Appendix I.

Reviewer Comments:

- 4) Payroll documentation: Are charges for salaries and wages based on payrolls documented by appropriate time sheets (including timesheets indicating times worked) and approved by responsible official of the grantee? [OMB Circular A110 and A122]

- Yes
 No

Reviewer Comments:

- 5) Allocation of salaries: If salaries involve payments from more than one activity line (i.e. Rental Assistance, Leasing, Operating Costs, and Supportive Services) can payments for wages clearly be tracked to the eligible activities? [84.21(b) and 85.20(b)]

- Yes
 No

Reviewer Comments:

- 6) Program Income: Has program income earned by the grantee been added to funds committed to project by HUD and used for eligible activities under 24 CFR Part 578 [578.97(b)]

- Yes
 No

Reviewer Comments:

- 7) Indirect Costs: If indirect costs have been charged, does the grantee have an indirect cost rate proposal that is in accordance with OMB Circulars A-87 or A-122, as applicable? [578.63]

- Yes
 No

Reviewer Comments:

- 8) Separation of duties: is there evidence that financial duties are separated so that no one individual has complete authority over a financial transaction? [OMB Circular A110 & A122]

- Yes
 No

Reviewer Comments:

- 9) Travel: Review a sample of travel expenditures. Were they necessary and proper? Was reimbursement in accordance with GSA policies? [OMB A-122]

- Yes
 No

Reviewer Comments:

- 10) Eligibility of expenditures: Do funded expenditures reviewed meet program and fiscal eligibility requirements? [578.37-578.59 and OMB A-122]

- Yes
 No

Reviewer Comments:

- 11) Equipment: Has physical inventory of the equipment been taken and the result reconciled with the property records in the past two years? [85.32 and 84.34]

- Yes
 No

Reviewer Comments:

12) Equipment records: Does the grantee maintain equipment records that contain information required (item, date acquired, cost, serial number, Federal share of acquisition)? [85.32 & 84.34]

- Yes
 No

Reviewer Comments:

13) Conflicts of Interest: Does the grantee meet the conflict of interest requirements (no financial interests or benefit from assisted activity on part of staff (or personal with whom the staff member has immediate family or business ties) during his/her tenure with organization and one year following his/her tenure. This includes, procurement, rent reasonableness determinations, and housing quality inspections for a property owned by the grantee or subgrantee [578.95]

- Yes
 No

Guidance: Sample "Rent Reasonableness Checklist and Certification" form available at <http://www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc>

Reviewer Comments:

9) Homeless Management Information System (HMIS)

1) Has the grantee collected and entered data on all persons served and all activities assisted into the applicable database, in accordance with HUD's standards on participation, data collection, and reporting under the local CoC HMIS policies and procedures? [576.400(f)]

- Yes
 No

Reviewer Comments:

2) Does the grantee participate in local CoC planning, governance, performance evaluation and management process?

- Yes
 No

Reviewer Comments:

- 3) Does the grantee participate in the local CoC coordinated entry system in accordance with HUD requirements?
- Yes
 - No

Reviewer Comments:

Street Outreach:

- 1) Were street outreach costs limited to the costs of: providing essential services necessary to reach out to unsheltered homeless people; connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility? [576.101(a)]

- Yes
 No

Reviewer Comments:

- 2) Were ESG funds used for transportation limited to the following eligible costs:
- The transportation costs of travel by outreach workers, social workers, or other service providers, and that the travel took place during the provision of services eligible; and
 - The costs of transporting unsheltered people to emergency shelters or other service facilities? [576.101(a)(5)]

- Yes
 No

Reviewer Comments:

- 3) Did the recipient ensure that outreach services were provided to unsheltered homeless individuals and families for at least the period during which ESG funds were provided (e.g. the length of the subrecipient agreement)? [576.101(b)]

- Yes
 No

Reviewer Comments:

- 4) Were all activities in compliance with the applicable written standards for targeting and providing essential street outreach services? [576.400(e)]

- Yes
 No

Reviewer Comments:

Emergency Shelter:

- 1) Were all essential services provided only in an emergency shelter or to homeless individuals and families staying in emergency shelter? [576.102(a)]

- Yes
 No

Reviewer Comments:

- 2) Were ESG funds used for the costs of eligible activities, for the purposes of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant?

- Yes
 No

Reviewer Comments:

- 3) Were ESG funds used for transportation costs for travel by program participants to and from medical care, employment, child care, or other eligible essential services facilities? [576.102(a)(1)(x)]

- Yes
 No

Reviewer Comments:

- 4) Did the shelter operations records document that ESG funds were used for the costs of maintenance, rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies necessary for the operation of the emergency shelter, and, when no appropriate shelter is available, for hotel or motel vouchers for homeless families or individuals? [576.500(k)]

- Yes
 No

Reviewer Comments:

- 5) If the recipient terminated any participants from the program, did they:
- Do so in accordance with the formal process established that recognizes the rights of individuals affected; and
 - Examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated

only in the most severe cases? [576.402(a)]

- Yes
- No

Reviewer Comments:

6) Did the recipient have policies and procedures in place to ensure that providers of emergency shelter that serve households with children under 18 do not deny admission to a family based on the age of any child under 18? [576.102(b)]

- Yes
- No

Reviewer Comments:

7) If ESG funds were used for shelter operations or renovation, do the records of the recipient reflect that the shelter met the minimum safety, sanitation, and privacy standards set forth at 24 CFR 576.403, including inspection reports required? [576.500(j)]

- Yes
- No

Reviewer Comments:

8) Habitability Standards: Does the shelter comply with minimum standards for accessibility in accordance with the Rehabilitation Act (29 U.S.C. 794), the Fair Housing Act (42 U.S.C. 3601 et seq.) and Title II of the Americans with Disabilities Act (42 U.S.C. 12131)?

- Yes
- No

Reviewer Comments:

9) Accessibility of Services: Does the grantee meet the regulatory requirements relating to access, transportation, disability accommodations and linguistic needs? [576.407(b)]

- Yes
- No

Reviewer Comments:

10) Were all activities in compliance with the applicable written standards for targeting and providing essential emergency shelter services? [576.400(e)]

- Yes
- No

Reviewer Comments:

Rapid Re-housing and Homelessness Prevention:

1) Did the recipient conduct an initial evaluation to determine each individual's or family's eligibility for rapid re-housing or homelessness prevention assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing? [576.401(a)]

- Yes
- No

Reviewer Comments:

2) Does the documentation indicate that all program participants who received homelessness prevention assistance met the eligibility criteria of the "at risk of homelessness" definition or categories 2, 3, or 4 of the "homeless" definition and have an annual income below 30% AMI? [576.103; 576.401(c); 576.500(b)]

- Yes
- No

Reviewer Comments:

3) Did the recipient document that all program participants who received rapid re-housing assistance met the eligibility criteria under category 1 of the homeless definition or under category 4 and live in an emergency shelter or place described in category 1 of the homeless definition? [576.104; 576.500(b)]

- Yes
- No

Reviewer Comments:

4) Were all activities in compliance with the applicable written standards for targeting and providing homelessness prevention and rapid re-housing assistance? [576.400(e)]

- Yes
- No

Reviewer Comments:

- 5) For each individual and family determined ineligible to receive ESG assistance, did the recipient document the reason for that determination?
- Yes
 - No

Reviewer Comments:

- 6) Were ESG funds used for the costs of eligible activities, to help the program participant regain stability in current housing or to move into other permanent housing and achieve stability in that housing? [576.103; 576.500(f)]
- Yes
 - No

Reviewer Comments:

- 7) Do the program participant files document that the program participant met with a case manager at least once per month to assist the participant in ensuring long-term housing stability? [576.401(e); 576.500(f)]
- Yes
 - No

Reviewer Comments:

- 8) If the recipient terminated any participants from the program, did they do so in accordance with the formal process established that recognizes the rights of individuals affected, that met the following requirements [576.402]:
- a. written notice to the program participant containing a clear statement of the reasons for termination,
 - b. a review of the decision, in which the program participant is given the opportunity to present written and oral objections before a person other than the person (or a subordinate) who made or approved the termination decision, and
 - c. prompt written notice of the final decision to the program participant?
- Yes
 - No

Reviewer Comments:

9) Where ESG funds were used for rental assistance (TBRA or PBRA) or supportive services, do records reflect that the recipient complied with all lead-based paint requirements? [576.403(a)]

- Yes
- No

Reviewer Comments:

10) Did the recipient ensure that all housing units met the minimum habitability standards before incurring any costs to help program participants remain in or move into those housing units? [576.403; 576.500(j)]

- Yes
- No

Reviewer Comments:

11) Did the recipient ensure that no program participant received financial assistance under 24 CFR 576.105(a) that was of the same type of assistance that the program participant was receiving through other public sources?

- Yes
- No

Reviewer Comments:

12) Were eligible costs paid only to a housing owner, utility company, or other third party (not directly to the program participant)? [576.105(a)]

- Yes
- No

Reviewer Comments:

13) Were rental housing application fees paid for with ESG funds a standard charge issued by the owner to all applicants? [576.105(a)]

- Yes
- No

Reviewer Comments:

14) Were security deposits paid for with ESG funds equal to no more than 2 months' rent? [576.105(a)]

- Yes
- No

Reviewer Comments:

15) Were costs for the last month's rent paid for with ESG funds[576.105(a)(3)]:

- a. Necessary to obtain housing for a program participant;
 - b. Paid to the owner of the housing at the time the owner was paid the security deposit and first month's rent;
 - c. Less than or equal to one month's rent; and
 - d. Included in calculating the program participant's total rental assistance?
- Yes
 - No

Reviewer Comments:

16) Were utility deposits paid for with ESG funds only for eligible types of utility services (gas, electric, water, and sewage) and required by the utility company for all customers? [576.105(a)]

- Yes
- No

Reviewer Comments:

17) Were utility payments paid for with ESG funds [576.105(a)(5)]:

- a. Within the limit of 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service;
 - b. Only provided when the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments; and
 - c. Only for eligible types of utility services (gas, electric, water, and sewage)?
- Yes
 - No

Reviewer Comments:

18) Were moving costs paid for with ESG funds only for moving-related activities such as truck rental, hiring a moving company, and allowable temporary storage fees (up to 3 months, fees accrued after the date the program participant began receiving services and before moving into permanent housing, and excluding storage fees in arrears)? [576.105(a)(6)]

- Yes
- No

Reviewer Comments:

19) Were housing search and placement costs paid for with ESG funds necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing? [576.105(b)]

- Yes
- No

Reviewer Comments:

20) Were ESG funds used for services costs listed in 24 CFR 576.105? If so, refer to HUD ESG monitoring guide for specific regulations.

- Yes
- No

Reviewer Comments:

21) Did the recipient use ESG funds for short- and/or medium-term rental assistance listed in 24 CFR 576.106? If so, refer to HUD ESG monitoring guide for specific regulations.

- Yes
- No

Reviewer Comments:

22) Rent Reasonableness: If grant funds are used to lease individual units or if rental assistance is provided, has the grantee conducted a rent reasonableness determination? [578.49(b)]

Guidance: When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for a comparable space. In addition, the rent paid may not exceed rents currently being

charged by the same owner for comparable unassisted space. The recipient must determine whether the rent charged for the unit receiving rental assistance is reasonable, taking into account the location, size, type, quality amenities, facilities, management and maintenance of each unit.

- Yes
- No

Reviewer Comments:

Continuum of Care (CoC) Compliance

1) Does the grantee operate in a manner consistent with housing first practices as reflected in the CoC written standards?

Guidance: Monitors will review if practices are consistent with 1) ensuring low barrier, 2) helping participants resolve barriers, 3) seeking to quickly resolve the housing crisis as a priority, 4) allowing participants to choose, and 5) connecting participants to support and services that foster long-term housing stability.

- Yes
- No

Reviewer Comments:

2) Does withdrawal information from the Line of Credit Control System (eLOCCS) match the information from the CoC’s grantee’s drawdown voucher requests? [OMB Circular A110 &A122]

- Yes
- No

Reviewer Comments:

Indicate Initials of Charts Selected and in applicable, discharge/admission status

#1 _____ __ Discharge __ Admission	#2 _____ __ Discharge __ Admission	#3 _____ __ Discharge __ Admission	#4 _____ __ Discharge __ Admission	#5 _____ __ Discharge __ Admission
#6 _____ __ Discharge __ Admission	#7 _____ __ Discharge __ Admission	#8 _____ __ Discharge __ Admission	#9 _____ __ Discharge __ Admission	#10 _____ __ Discharge __ Admission

Applications, disposition records, and all related documents from at least one applicant recently denied admissions to the program –please have available a list of all applicants denied in the past 12 months.

Indicate Initials of Charts Selected:

#1:

#2:

#3

3) Was the most recent APR submitted to HUD no later than 90 days from the date of the end of the project's grant term? [578.103(e)]

Yes

No

Reviewer Comments:

4) Were all close out reports required by HUD submitted no later than 90 days from the date of the end of the project's grant term and as instructed in the closeout certification issued by HUD? [578.109(b)]

Yes

No

Reviewer Comments:

5) If there was a significant change made that required a grant amendment, is an executed amendment on file? Significant changes include, a change of recipient, a shift in a single year of more than 10 percent of the total amount awarded under the grant for one approved eligible activity to another activity and a permanent change in the subpopulation served by any one project funded under the grant, as well as a permanent proposed reduction in the total number of units funded under the grant. [578.105 (a)]

Yes

No

Reviewer Comments:

6) Is the number of participants currently being served consistent with the number in the approved application?

Yes

No

Reviewer Comments:

- 7) Accessibility of Services: Does the grantee meet the regulatory requirements relating to access, transportation, disability accommodations and linguistic needs?

[576.407(b)]

- Yes
 No

Reviewer Comments:

CoC Permanent Supportive Housing:

- 1) Occupancy Agreements: Does grantee have a signed occupancy agreement/lease with all program participants residing in housing (permanent housing must have an initial one year agreement, transitional must have at least a monthly agreement).

[578.77(a) and 578.51(l)]

- Yes
 No

Reviewer Comments:

- 2) Permanent Supportive and Transitional Housing Calculation of occupancy charges/rent:

- a) Calculations: If grantee imposes occupancy charges is income calculated in accordance with 24 CFR 5.609 and 5.611 and is the rent charged not greater than 30% of family's adjusted income or 10% of gross income? [578.77(b)]

Guidance: If grantee has used the CPD income calculator and this is documented by system printouts, the no further assessment is required. If the grantee is using something other than the CPD income calculator, review calculations in selected client's charts to be sure HUD requirements are followed. HUD CPD Income Calculator at:

<https://www.hudexchange.info/resource/2079/cpd-income-eligibility-calculator/>

- Yes
 No

Reviewer Comments:

- b) Adjustment: Is rent adjusted upon notification of change in income? [578.77(c)]

- Yes
 No

Reviewer Comments:

c) Review: Is income reviewed annually or when there is a change in income and is documentation of the review on file? [578.77 (c)]

- Yes
 No

Reviewer Comments:

3) Were CoC funds used to “screen-in” applicants with the greatest barriers to housing, by prioritizing people who have the highest service needs as evidenced by the vulnerability assessment and using low barrier admission policies?

- Yes
 No

Reviewer Comments:

4) Does the grantee incorporate practices and policies that prevent lease violations and evictions among tenants? For example, Housing First models may have policies that give tenants some flexibility to enter into payment installment plans rather than moving towards eviction proceedings.

- Yes
 No

Reviewer Comments:

5) Housing Quality Standards: Has all housing assisted through leasing or rental assistance with CoC funds been inspected prior to occupancy and re-inspected at least annually? [578.75(b)]

- Yes
 No

Reviewer Comments:

6) Lead based paint: Has the grantee conducted a visual assessment of all units receiving financial assistance if the unit was constructed prior to 1978 and if there will be a child under 6 or a pregnant woman residing in the unit? [578.99(f)]

- Yes
 No

Reviewer Comments:

- 7) Dwelling Size: Does the dwelling unit have at least one bedroom or living/sleeping room for each two persons? [578.75(c)]
- Yes
 - No

Reviewer Comments:

- 8) Retention of assistance in PSH: Has a family been able to retain rental assistance until the expiration of the lease in effect when qualifying member died, was incarcerated or institutionalized? [578.75(i)]
- Yes
 - No
- 9) Environmental Review: Has the grantee complied with environmental review requirements (Grantee will not acquire, rehabilitate, convert, lease provide sponsor or project based rental assistance, repair, dispose or, demolish or construct property or expend HUD funds until an Environmental Review under 24 CFR part 50 has been completed and the grantee has received HUD approval of the property)? [578.31] *Guidance: Monitors will review files for evidence of environmental review and notice of HUD approval. For more guidance see: <https://www.hudexchange.info/environmental-review/>*
- Yes
 - No

Reviewer Comments:

CoC Rapid Re-Housing:

- 1) RRH Calculation of occupancy rent:
- a) Calculation: Is income calculated in accordance with 24 CFR 5.609 and 5.611 and is the rent charged not less than 30% of family's adjusted income? Is total rental assistance received by each participant in line with Ventura County Written Standards?
 - Yes
 - No

Reviewer Comments:

b) Adjustment: Is rent adjusted upon notification of change in income? [578.77(c)]

- Yes
- No

Reviewer Comments:

c) Review: Is income reviewed at least every 90 days or when there is a change in income and is documentation of the review on file?

- Yes
- No

Reviewer Comments:

2) Did the grantee ensure that individuals and families were defined under any of the four categories included in the Homeless Definition Rule?

- Yes
- No

Reviewer Comments:

3) Were CoC Rapid Re-Housing costs limited to tenant-based rental assistance only?

- Yes
- No

Reviewer Comments:

4) Were CoC funds used for financial assistance limited to the following eligible costs:

- a) Security deposits (up to 2 months)
- b) First and last month's rent
- c) Property damage

- Yes
- No

Reviewer Comments:

- 5) Did the grantee consistently follow policies and procedures established for determining the amount or percentage of rent each program participant must pay and the maximum number of eligible months?

- Yes
 No

Reviewer Comments:

- 6) If the supportive services were provided, did the program participant attend monthly case management meetings?

- Yes
 No

Reviewer Comments:

- 7) Did the grantee consistently follow policies and procedures established for supportive services, as outlined in 24 CFR part 578.53?

- Yes
 No

Reviewer Comments:

- 8) Rent Reasonableness: If grant funds are used to lease individual units or if rental assistance is provided, has the grantee conducted a rent reasonableness determination? [578.49(b)]

Guidance: When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for a comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space. The recipient must determine whether the rent charged for the unit receiving rental assistance is reasonable, taking into account the location, size, type, quality amenities, facilities, management and maintenance of each unit.

- Yes
 No

Reviewer Comments:

- 9) FMR Ceilings: If CoC grant funds are used to lease individual units, has the grantee observed the limitation that rents may not exceed Fair Market Rents [578.49(b)]
- Yes
 - No

Reviewer Comments:

- 10) Security Deposits: If the grantee uses CoC funds for security deposits, are the amounts of the deposits not in excess of two months' rent? [578.49(b) and 578.51(a)]
- Yes
 - No

Reviewer Comments:

- 11) Environmental Review: Has the grantee complied with environmental review requirements (Grantee will not acquire, rehabilitate, convert, lease provide sponsor or project based rental assistance, repair, dispose or, demolish or construct property or expend HUD funds until an Environmental Review under 24 CFR part 50 has been completed and the grantee has received HUD approval of the property)? [578.31] *Guidance: Monitors will review files for evidence of environmental review and notice of HUD approval. For more guidance see: <https://www.hudexchange.info/environmental-review/>*
- Yes
 - No

Reviewer Comments:

- 12) Restriction on combining funds: Has the grantee combined any leasing, tenant-based rental assistance, short- or medium-term rental assistance, or rental assistance and operating in a single structure or housing unit? [578.87(c)]
- Yes
 - No

Reviewer Comments:

13) Housing Quality Standards: Has all housing assisted through leasing or rental assistance with CoC funds been inspected prior to occupancy and re-inspected at least annually? [578.75(b)]

- Yes
- No

Reviewer Comments:

14) Lead based paint: Has the grantee conducted a visual assessment of all units receiving financial assistance if the unit was constructed prior to 1978 and if there will be a child under 6 or a pregnant woman residing in the unit? [578.99(f)]

- Yes
- No

Reviewer Comments: