

Ventura County Continuum of Care
Homeless Housing, Assistance
and Prevention Monitoring

2021/2022

Agency:

Project Monitored:

Grant Number:

Monitoring Date:

Contract Year Monitored:

Total Grant Amount:

Number of Households Served during the FY:

Type of Funds:

Program Type:

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Grantee Monitoring Tool & Guide - updated 09.22.2023

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/ State and VC CoC requirements. This guidance is intended to help HHAP program recipients and subrecipients to maintain compliance with requirements and prepare for VC CoC and State monitoring.
- Sections 1 to 11 apply to all HHAP funded programs. There are additional compliance sections for HHAP, 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:

- Most recent Annual Performance Report (APR) or CAPER
- Most recent HMIS Data Quality Framework report
- List of all participants served in the past 12 months, including admission data and discharge date (HMIS identifier only)-*provided by CoC staff*
- List of all applicants declined for admission in the past 12 months (unique identifier only)
- Two most recent drawdowns or invoices.
- 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
 - Violence Against Women Act (VAWA) policy
 - 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 the 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, 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.

3) Visual Observation

1) Are financial records secured in a 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 HHAP 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 HHAP 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

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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:

5) Documentation of Leverage - Does the grantee have documentation of leveraging as defined in the NOFA under which the project was funded?

- Yes
- No
- N/A

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

4) Administrative costs and requirements

Reviewer Comments:

1) Indirect Costs: If indirect costs have been approved by CoC and charged, does the grantee have an indirect cost rate proposal that is in accordance with Business of Consumer Affairs State regulation of 7% Health and Safety Code section 50220.7(f)?

- Yes
- No
- N/A -If not applicable, please skip to Section 5

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
- N/A

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/State sponsored training]; or Environmental review [578.59(a)]

- Yes
- No

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:

5) Nondiscrimination and Equal Opportunity Requirements

1) 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:

6) Conflict of Interest

1) Does the project comply with State and Federal conflict of interest laws set forth in Government Code 1090 and Public Contract Code, sections 10401 and 10411?

- Yes
- No

Reviewer Comments:

7) Child Support Compliance Act

1) If contract exceeds \$100,000, does the project comply with State and Federal laws relating to child and family support enforcement as set forth in Chapter 8 (commencing with section 5200) of Part 5 of Division 9 of the Family Code?

- Yes
- No
- N/A

Reviewer Comments:

8) Drug Free Workplace Certification Requirements

- 1) Does the project comply with State of California laws Drug-Free Workplace Act of 1990 (Government Code 8350 et. Seq.)?
- Yes
 - No

Reviewer Comments:

9) 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:

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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
- N/A

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
- N/A

Reviewer Comments:

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

- Yes
- No
- N/A

Reviewer Comments:

7) 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:

8) Travel: Review a sample of travel expenditures. Were they necessary and proper? Was reimbursement in accordance with U.S. General Services Administration transportation cost rates. <https://www.gsa.gov/travel/plan-book/per-diem-rates?> [OMB A-122]

- Yes
- No
- N/A

Reviewer Comments:

9) Eligibility of expenditures: Do funded expenditures reviewed meet program and fiscal eligibility requirements? [Health and Safety Code section 50220.7 (e)]

- Yes
- No

Reviewer Comments:

10) 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
- N/A

Reviewer Comments:

11) 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
- N/A

Reviewer Comments:

12) 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 <https://files.hudexchange.info/resources/documents/RentReasonableChecklist.pdf>

Reviewer Comments:

10) 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) or Participation in Statewide HDIS Health and Safety Code section 50220.7(b)(3)]

- 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 and State requirements [Section 578.7 of Title 24 of the Code of Federal Regulations, as that section read on January 10, 2019]?

- Yes
- No

Reviewer Comments:

11) Homeless Housing Assistance and Prevention (HHAP) Program Compliance

1) Does the grantee operate in a manner consistent with housing first practices as reflected in the CoC written standards [Health and Safety Code section 50220.7(g)]?

- Yes
- No
- N/A (*HMIS/CES System supports only-please skip to section 18*)

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.

Reviewer Comments:

2) Did each participant receive an HMIS/CES assessment to identify needs and barriers to obtain housing and document eligibility?

- Yes
- No

Reviewer Comments:

3) Is the number of participants currently being served consistent with the number in the approved application/contract?

- Yes
- No

Reviewer Comments:

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

_____	_____	_____	_____	_____
<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge
<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> Admission
_____	_____	_____	_____	_____
<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge	<input type="checkbox"/> Discharge
<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> Admission	<input type="checkbox"/> 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: _____

12) HHAP Street Outreach/Outreach and Coordination:

- 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 HHAP funds used for transportation limited to the following eligible costs:
- a. 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
 - b. 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 HHAP 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:

13) HHAP Emergency Shelter/Interim Sheltering:

- 1) Were all essential services provided only in an emergency shelter/motel voucher or to homeless individuals and families staying in emergency shelter? [576.102(a) and Health and Safety Code section 50220.7 (e)]
- Yes
 - No

Reviewer Comments:

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2) Were HHAP 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? [Health and Safety Code section 50220.7 (e)]

- Yes
- No

Reviewer Comments:

3) Were rules eliminated or expectations that could be perceived to be unreasonable or punitive in accordance to Housing First Principles? (Health and Safety Code section 50220.7 (g))

- Yes
- No

Reviewer Comments:

4) Did the shelter operations records document that HHAP 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/or, when no appropriate shelter is available for hotel or motel vouchers for homeless families or individuals if approved? [576.500(k)]

- Yes
- No

Reviewer Comments:

5) If the recipient terminated any participants from the program, did they:

- a. Do so in accordance with the formal process established that recognizes the rights of individuals affected; and
 - b. 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
 - N/A

Reviewer Comments:

6) Did the recipient have policies and procedures in place to ensure that providers of emergency shelter/interim sheltering 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) 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:

8) 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:

9) 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:

14) HHAP Homeless Prevention and Diversion/Rapid Re-Housing:

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? [Section 578.3 of Title 24 of the Code of Federal Regulations, as that section read on January 10, 2019]

- Yes
- No
- N/A

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? [Section 578.3 of Title 24 of the Code of Federal Regulations, as that section read on January 10, 2019]

- Yes
- No
- N/A

Reviewer Comments:

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

- Yes
- No

Reviewer Comments:

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5) For each individual and family determined ineligible to receive HHAP assistance, did the recipient document the reason for that determination?

- Yes
- No

Reviewer Comments:

6) Were HHAP 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? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)]

- 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
 - N/A

Reviewer Comments:

9) Where HHAP funds were used for rental assistance 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) As part of HQS, 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:

12) 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:

13) Were eligible costs paid only to a housing owner, utility company, or other third party (not directly to the program participant)? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]

- Yes
- No

Reviewer Comments:

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14) Were rental housing application fees paid for with HHAP funds a standard charge issued by the owner to all applicants? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]

- Yes
- No

Reviewer Comments:

15) Were security deposits paid for with HHAP funds equal to no more than 2 months' rent? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]

- Yes
- No

Reviewer Comments:

16) Were costs for the last month's rent paid for with HHAP funds [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]:

- d. Necessary to obtain housing for a program participant;
- e. Paid to the owner of the housing at the time the owner was paid the security deposit and first month's rent;
- f. Less than or equal to one month's rent; and
- g. Included in calculating the program participant's total rental assistance?

- Yes
- No

Reviewer Comments:

17) Were utility deposits paid for with HHAP funds only for eligible types of utility services (gas, electric, water, and sewage) and required by the utility company for all customers? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]

- Yes
- No

Reviewer Comments:

- 18) Were utility payments paid for with HHAP funds [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]:
- a. Within the limit of 12 months of utility payments per program participant, per service, including up to 2 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:

- 19) Were moving costs paid for with HHAP 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)? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]:
- Yes
 - No

Reviewer Comments:

- 20) Were housing search and placement costs paid for with HHAP funds necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing? [Health and Safety Code Section 50219(c)(1), (2), (3), and (7)) and 50220.8(e)-(f)]
- Yes
 - No

Reviewer Comments:

- 21) Did the recipient use HHAP funds for short and/or medium-term rental assistance listed in 24 CFR 576.106?
- 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)]

- Yes
- No
- N/A

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.

Reviewer Comments:

15) HHAP Operating Subsidies:

1) Were all essential services provided only in an emergency shelter/motel voucher or permanent housing to homeless individuals and families staying in emergency shelter/permanent housing? [576.102(a) and 50220.8(e)-(f)]

- Yes
- No
- N/A

Reviewer Comments:

2) Were services expanded and/or operational hours to meet the demonstrated need?

- Yes
- No
- N/A

Reviewer Comments:

3) Were rules eliminated or expectations that could be perceived to be unreasonable or punitive?

- Yes
- No
- N/A

Reviewer Comments:

4) Were operating subsidies used to cover staffing costs?

- Yes
- No
- N/A

Reviewer Comments:

5) Did the shelter operations records document that HHAP 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? [Health and Safety Code section 50220.7 (e)]

- Yes
- No

Reviewer Comments:

6) If HHAP 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
- N/A

Reviewer Comments:

16) HHAP Landlord Incentives:

1) Were incentives to landlords used such as security deposits, sign on bonuses or holding fees?

- Yes
- No

Reviewer Comments:

2) Do records document that HHAP funds were used for security deposits, sign on bonuses or holding fees?

- Yes
- No

Reviewer Comments:

17) HHAP Housing Location / Navigation:

1) Were housing location / navigation efforts provided system wide to support existing agency efforts?

- Yes
- No

Reviewer Comments:

2) Were funds allocated for eligible uses and in alignment with State funding priorities as follows:

- I. Progress made toward local homelessness goal;
 - II. Outreach resulted in additional units dedicated to serving homeless households;
- and

III. Housing First principles were followed?

- Yes
- No
- N/A

Reviewer Comments:

3) Did the recipient participate in the Ventura County Homeless Management Information System and Coordinated Entry System?

- Yes
- No

Reviewer Comments:

18) HHAP CES System Supports:

1) Were HHAP funds used for services (check all that apply):

- Needs or gaps assessments, additional data collection, analysis of data, trainings on best practices for service delivery, systems performance improvements, capacity building activities, improving coordinated or intentional case conferencing processes, and/or improving staff wellness to improve their ability to provide quality services.
- Fiscal software to track fiscal usage of all homeless programs and improve real time communication about funding.
- Coordinated assessment and referral system management.
- Strategic planning activities not related to federal requirements, including development and implementation of a regional plan to address homelessness.
- HMIS oversight and management.
- Stipends for individuals with lived experience to participate in a Lived Experience Board or other system support initiative.

Reviewer Comments:

19) HHAP Services Coordination:

1) Were HHAP funds used for services costs for access to workforce, education, and training programs, or other services needed to promote housing stability in supportive housing.?

- Yes
- No

Reviewer Comments:

2) Were HHAP funds used for supportive services? If yes, please address the average length of case management provided for housing retention. _____

- Yes
- No
- N/A

Reviewer Comments:

3) Were HHAP funds used for services costs for clothing, food or transportation?

- Yes
- No

Reviewer Comments:

20) HHAP Delivery of Permanent Housing and/or Supportive Services:

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. [Health & Safety Code Section 50220.8(e)-(f)])

- Yes
- No

Reviewer Comments:

2) Permanent Housing/Supportive 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)]
 - Yes
 - No
 - N/A

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/>

Reviewer Comments:

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

- Yes
- No

Reviewer Comments:

4) 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:

5) Were HHAP 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:

6) 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:

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

- Yes
- No

Reviewer Comments:

- 8) Lead based paint: As part of HQS checklist, 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:

- 9) 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:

- 10) For each individual and family determined ineligible to receive HHAP assistance, did the recipient document the reason for that determination?

- Yes
 No

Reviewer Comments:

- 11) Were HHAP 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:

- 12) 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:

- 13) 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
 - N/A

Reviewer Comments:

- 14) As part of HQS, 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:

- 15) Were housing search and placement costs paid for with HHAP funds necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing? [576.105(b)]
- Yes
 - No

Reviewer Comments: