

**Three County Continuum of Care
Subrecipient Manual**

Purpose of this Manual:

The following Subrecipient Policies and Procedures are intended to provide an overview of the general, administrative, fiscal, billing, and programmatic policies and procedures for Three County CoC subrecipients. Three County CoC's Subrecipient Policies and Procedures are sourced from the CoC Program Interim Rule, the Code of Federal Regulations (2 CFR Part 200), HUD Exchange resources, and Community Action Pioneer Valley's Accounting & Financial Policies and Procedure Manual.

Updates from Previous Edition (June 2024)

- 1. F. Project Monitoring – Updated citations, updated documentation retention to 5 years; updated other things to reflect changes for 2025 Site monitoring
- 2. A. 1. updated Contract section to add Closeout letter guidance
- 2. D. Updated language on expectations of projects to attend case conferencing, including the frequency that case conferencing occurs.
- 2. E. Housing First – reformatted bullet points. Clarified how Housing First is evaluated in Subrecipient Monitoring.
- 3. A. 2. Participant File section has been reformatted to reference updated Client File checklist in Appendix F
- 3. D. Requirements for Housing units – updates to resources/citations for Housing Standards.
- 3. E. CAPV Accounting Principles – Updated citations and links to 2 CFR 200; Clarified that Subrecipients cannot over expense a Budget Line Item;
- 4. A. Eligible Costs & Activities – updated and clarified references to 2 CFR 200 Part E Cost Principles; removed “Eligible Activities and Required Back-Up Documentation” which has been moved to the *Fiscal Guide – Grant Guideline for Expense*.
- 4. B. Three County CoC Match Policy & Requirements – removed Match guidance that is included in the Three County CoC Fiscal Guide – updated and included references to the Fiscal Guide where relevant.
- 4. D. Billing Submission Policies and Procedures – Updated to reduce documents that need to be submitted after the first two months of a contract term for monthly billing. Clarified when a signed cover page is necessary for monthly billing. Updated references to the Fiscal Guide, which consolidated other documents and resources.
- Appendix C. Definitions and Categories of Homeless – Updated to remove Category 3, since it is ineligible for any Three County CoC projects.
- Appendix F. Program Participant File Checklist – updated to focus on record keeping requirements, removed items that were only needed to be recorded in HMIS (HMIS Intake form), Environmental Review documentation, etc.

- Appendix G – Removed. Included examples of fiscal billing forms, which are now all available in the “Fiscal Guide” on the Subrecipient webpage.
<https://www.threecountycoc.communityaction.us/subrecipient-documents>

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1. Overview of the Continuum of Care

Continuum of Care (CoC) programs are federally funded, regionally focused entities established to fund efforts by nonprofits, local/state governments, and others working to assist persons experiencing homelessness. CoCs also facilitate planning, networking, and strategizing initiatives to prevent and end homelessness in the region.

The Three County CoC serves all of Franklin, Hampshire and Berkshire counties.

A. Roles & Responsibilities

The Three County CoC is comprised of agencies, providers and stakeholders with different levels of engagement & partnership:

⇒ CoC Funded Projects	-Operate one or more programs funded by the CoC Applies for CoC funding annually
⇒ CoC Partner Providers	-CE, HMIS users
⇒ Regional Service Programs	-Other Human Service providers w/ overlapping population, but not housing, homelessness providers
⇒ CoC Members	-Any other individual, agency or business wishing to be involved in achieving the CoC mission & supporting our projects

HUD defines multiple functional roles that must be performed in order to meet the financial, operational and administrative requirements for governing the CoC and its partner projects. Some of these roles are defined below and may be referenced throughout the course of this manual.

ROLE	RESPONSIBLE FOR	Who is it?
<i>Collaborative Applicant</i>	Submit application for funding to HUD on behalf of all funded programs & the CoC; provide fiscal & programmatic monitoring for all Subrecipients	CAPV
<i>Subrecipient</i>	Agency receiving HUD CoC funds to operate an approved program	Your AGENCY
<i>Subrecipient Project (or Project)</i>	CoC-funded program operated by the Subrecipient (Subrecipients may have more than one CoC-funded projects)	Your PROGRAM
<i>HMIS Lead</i>	Complete all HUD required reporting, day-to-day management of the HMIS system, training all users in HMIS & ensuring CoC and Subrecipient compliance with HMIS Policies	CAPV
<i>Coordinated Entry Lead</i>	Institute & manage the Coordinated Entry system across the region, train & support CE Assessors, facilitate Case Conferencing & maintain communication with all CoC Partner Providers	CAPV

B. Program Components/Project Types

Under HUD regulations, the CoC grant can be used to fund the activities of four different types of Programs:

1. Permanent Housing (**PH**); *two types of PH projects are:*
 - Permanent Supportive Housing (PSH)
 - Rapid Rehousing (RRH)
2. Transitional Housing (**TH**)
3. Supportive Services Only (**SSO**)
4. Homeless Management Information Systems (**HMIS**)

Funded projects may also operate **Joint Component** programs, which provide more than one of the above project types within a single program. For example, an agency may operate a TH project and RRH project within the same program (with shared property, staff, practices, etc.).

Detailed descriptions of each component can be found on the HUD Exchange website: [CoC Program Components - Overview - HUD Exchange](#). Subrecipients and new applicants can also see the most up-to-date list of the Three County CoC's currently funded projects/project types on our website.

C. HUD CoC Grant Cycle

Subrecipient Projects must participate in a comprehensive application and evaluation process in order to request and secure funding annually. The process, which is coordinated by CAPV and the Three County CoC, is ongoing throughout the grant cycle and assigns each party specific responsibilities at each stage.

1. Notice of Funding Opportunity (NOFO)

The CoC grant cycle begins when HUD publishes the annual **Notice of Funding Opportunity (NOFO)**, which outlines the funding criteria for the upcoming Fiscal Year. The NOFO establishes any updated regulations, highlights HUD's priorities for CoC projects, and describes the type of funding available.

2. Request for Proposal (RFP)

The Three County CoC then compiles this information along with guidelines to apply for funding into a **Request for Proposal (RFP)**. The RFP is disseminated to all Subrecipients, partner agencies, CoC members, and regional stakeholders.

Agencies intending to apply for funding (both new and current Subrecipients) will receive the most up-to-date version of this document, the **CoC's Subrecipient Manual**. It is essential that these Policies & Procedures are reviewed by their agency's Fiscal and Senior Management teams. HUD

CoC grants are subject to strict operating expectations and highly regulated recordkeeping requirements, so it is important that all levels of agency leadership are provided with these standards.

The CoC can answer questions and offer guidance regarding project eligibility, operations or fiscal responsibilities as needed; examples of documentation or technical support can also be provided upon request.

3. Applications for Funding

Renewal Subrecipient Projects

Current Subrecipient Projects seeking to renew their current CoC funding must complete the Supplemental Application found in the RFP and submit it to the CoC Program Director or designee. This questionnaire collects information about the project's equity practices and other ranking factors that must be collected annually.

Subrecipients must also complete the HUD application via e-snaps and submit any necessary documentation (see below for e-snaps instructions).

New Project Applicants

Agencies seeking to apply for funding for the first time must complete the CoC's new project application form. Information required for a new application includes:

- Description of the proposed project
- Budget for the proposed project
- Details of subpopulations of individuals experiencing/at risk of homelessness to be served
- # of people to be served/# of housing units available
- Location of proposed project & property details

Note: New projects are not required to have a site purchased or leased at the time of the RFP Application but must be able to show that the agency will own or have control of a property by the end of the of the 12-month period beginning upon notification of an award for grant assistance.

New project applications are reviewed by the Three County CoC staff team and Board of Directors to determine the project's viability and ensure that applicants can meet all HUD and CoC requirements if awarded funding.

E-SNAPS

The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS) is known as *e-snaps*. This system supports the CoC Program funding applications and grant awards process. Visit [the HUD Exchange](#) for *e-snaps* navigation guides and instructions on completing funding applications.

D. CoC Project Selection & Ranking

Each project applying for funding is evaluated by the Three County CoC through Subrecipient Project Monitoring (see Section F for more details). During this process, current Projects' outcomes and performance are reviewed and scored based on a detailed set of standards. When the CoC submits the Collaborative Application to HUD, renewal projects are listed in their ranked order based on their Monitoring scores. The CoC's Project Ranking provides HUD with guidance for projects to be prioritized, but does not guarantee that funding will be awarded.

Please note that new project applications are not ranked in that year's NOFO; they are held harmless.

Once projects have been ranked, the Three County CoC will submit the grant applications for each Subrecipient and new applicant, as well as for CoC funded grant components (HMIS, Coordinated Entry, Planning and Administration). Typically, the CoC submits the **Consolidated Application** 60-90 days from the date of the NOFO publication.

HUD will award funds to recipients through a national competition based on selection criteria as defined in [Sec. 427 of the HEARTH Act](#).

E. HUD Selection & Award

Once the Collaborative Application is submitted by the CoC, HUD will review each identified for approval. Projects will be selected for funding based on the specific factors and criteria identified within the NOFO, as well as local CoC Priorities (evidenced by Project ranking). While the factors for selection, particularly those emphasized by HUD, are subject to change each year, there are overarching priorities that remain consistent year to year, such as promoting equity and serving chronically homeless individuals & families. Additionally, HUD reserves the right to introduce new criteria in the NOFO to be used in evaluating subrecipients.

HUD will notify the CoC when awards have been determined as well as if any conditions have been imposed on certain Projects. The Three County CoC will notify all subrecipient applicants of the status of their funding awards. Notifications of awards typically occur six months after submission of the Consolidated Application.

In the months following the HUD awards, the CoC will work with subrecipients to ensure any conditions set by HUD are satisfied; HUD will withdraw an award if the applicant does not satisfy all conditions imposed. Correcting all issues and conditions attached to an award must be completed within the timeframe established in the NOFO. Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction.

HUD will then execute a grant agreement with the recipient (the Three County CoC), who will then implement Subrecipient Agreements with each Project. Specific information regarding these agreements can be found in the next section of this manual.

For official HUD releases specific to the current CoC Program Competition cycle, visit [the HUD Exchange](#).

F. Project Monitoring

Each year, the Three County CoC conducts monitoring of its subrecipients to ensure proper stewardship of grant funds, as well as adherence to HUD's interim rule, the CoC Program, and the subrecipient agreement terms. The CoC will keep documentation of subrecipient monitoring, including findings and corrective actions, onsite for at least 5 years.

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically 2 CFR 200.332, requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.

Annual monitoring also helps to inform CAPV, as the collaborative applicant, for project ranking and evaluation in preparation for the annual NOFO competition. Monitoring includes both project and system level performance monitoring.

The components of monitoring are:

- **Financial:** project financial records to ensure compliance with the grant agreement, match requirements, and other contractual obligations.
- **Housing:** housing unit inspections, leases, and other records.
- **Participant:** records to ensure participant eligibility and history of provided services.
- **Project performance:** performance of a project to measure progress toward project and CoC Program goals, particularly system performance measures.
- **General Adherence to CoC Subrecipient policies & Governance:** A projects' responsiveness to The Three County CoC Subrecipient Policies and Procedures, Written Standards, and Governance structures may be evaluated as part of the annual monitoring of subrecipients.

Some details, such as the layout of the monitoring forms and specific wording of communications, may vary from year to year but the general process is as follows:

- The CoC meets with its Ranking and Evaluation Committee in the spring to review and approve the Monitoring forms.
- The CoC then emails all projects, informing them that the Monitoring process has begun. This email typically includes:
 - The forms the CoC uses to monitor (provided as reference for the subrecipients). These forms list the standards and thresholds the CoC will use to score projects during this process.

- A written list of required documents and materials from the subrecipients. In previous years, these materials included an agency's most recent audit; the Board of Directors list; policies and procedures related to HMIS/Data Management, Fiscal/Accounting, the specific CoC funded program; program intake materials; and the conduct and expectations of participants. Please note that this list is not exhaustive and subject to change.
- The forms the subrecipients must fill out and return; primarily the Subrecipient Self-Assessment, but the CoC reserves the right to introduce new forms as approved by the Ranking and Evaluation Committee.
- The unique identifiers for the participants whose files are selected to be reviewed (if necessary).
- The dates by which requested forms and documents must be submitted.
- A link to the secure ShareFile submission site.
- After sending out the monitoring email, the CoC works with each project to schedule the monitoring interview, if necessary (ensuring there is adequate time for CoC staff to review submitted documents and materials prior to the interview).
- At the monitoring meeting, CoC staff and CAPV Fiscal staff discuss the policies, procedures, forms, and documents that were submitted. The projects' system performance measures are also discussed. The CoC strives to ensure that monitoring meetings are a space of dialogue rather than lecture. Projects are encouraged to explain certain aspects, particularly if the CoC has noted an issue or something missing. If a project does not have adequate policies/procedures or at the time of the monitoring meeting has not yet submitted required materials, the CoC will note this as a Finding.
- A summary of results and feedback are communicated to each project following their monitoring interview.
 - For any projects whose monitoring process resulted in Findings, the necessary Corrective Actions are set, as well as deadlines for completion of said Actions.
- The CoC then meets with the Ranking and Evaluation Committee to review the monitoring scores and create its Priority Listing (which is submitted with the Collaborative Application). Beginning in 2025, the CoC will reintroduce on-site monitoring to some scopes, including but not limited to client file reviews. The CoC will offer multiple scheduling options to Subrecipients for on-site monitoring review.

2. Subrecipient Responsibilities

A. Subrecipient Agreement Requirements

All CoC Subrecipients are required to enter into an Agreement with Community Action Pioneer Valley (the Collaborative Applicant), which will include the project's budget as approved by HUD, certifying that the Project will operate in compliance with all HUD and Three County CoC operating standards. The subrecipient will also agree to provide the housing and/or services described in the project application, including the type of housing, services, and costs anticipated and the number of clients or households who will be served at any given time.

In carrying out the scope of the work, the subrecipient will agree to comply with all applicable Federal, State, and local laws and regulations, including: the [Cranston-Gonzalez National Affordable Housing Act of 1990, as amended \(P.L. 101-625\)](#); [the Fair Housing and Equal Opportunity Acts](#); and [Massachusetts fair housing laws](#).

Specifically, this agreement indicates that the project will:

- All services provided and costs incurred are eligible and appropriate based on the requirements of the [HEARTH Act](#), [CoC Program Interim Rule](#), [2 CFR Part 200](#), and the Annual NOFO under which the specific project is funded.
- Adhere to the following Three County CoC standards:
 - Billing & Fiscal Requirements (detailed in Part 4 of this manual)
 - [Governance Charter](#), which outlines the CoC's operating procedures & practices, committee and Board of Director structures, etc.
 - Project & Policy Requirements (detailed in Part 3 of this manual), including compliance with the HMIS Agency Agreement (detailed in Part 2.B of this manual)
 - [Coordinated Entry Written Standards](#) (detailed in Part 2.D)
- Maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project.
 - The address or location of any family violence project assisted by CoC funds will not be made public, except with written authorization of the person responsible for the operation of such project.
- Establish policies & practices that are consistent with, and do not restrict, the exercise of rights provided by [subtitle B of title VII of the Act](#) and other laws relating to the provision of education and related services to individuals and families experiencing homelessness.
- Follow Fair Housing and other practices (see Part 2.F) as written in the CoC's policies, charters, and written standards.

Subrecipients will sign this contract annually and will be held accountable for adhering to all expectations.

1. Contracts

Beginning of the Subcontract

As the grant Recipient, CAPV must receive written approval for the awarded funding from HUD prior to initiating contracts with any Subrecipients. Therefore, renewal projects may not be issued their subcontract until after their grant period has begun depending on the grant's start date. New Projects may also receive approval later than the grant start date, depending on HUD's timeline for award. CAPV will make every effort to initiate contracts for funding prior to the start of the grant period.

Subrecipients are expected to sign and return the contract within 30 days.

End of the Subcontract

In the two months prior to the end of each grant cycle, Three County CoC Staff will reach out to Subrecipients to plan for the final months of billing and ensure full spending of contract. Subrecipients are required to submit the final request for reimbursement (invoice package) no later than 45 days after the contract's end date. Subrecipients must also complete the APR Reporting Form within that 45-day period to ensure that the CoC has the required information for submission (more information on APRs can be found in Part 2.C).

The CoC will also send out a Closeout announcement letter, in which an example can be found in the CoC's Fiscal Guide on the following tabs of the workbook

- Close Out
- Renewal 2 Month Letter of Notification of Close Out
- Ending Project 2 Month Letter of Notification Closeout

B. HMIS and Data Requirements

Subrecipients of CoC funding are required to participate in the CAPV Clarity Homeless Management Information System (HMIS) and the CAPV Open Path Data Warehouse. HMIS is a HUD-mandated information technology system that is designed to capture client-level information on the service needs and characteristics of people experiencing homelessness.

Please be aware that this manual only outlines the subrecipient's obligations regarding HMIS. For complete details of CoC HMIS Policies and Procedures, including a full description of project requirements, see [here](#). Additionally, detailed privacy, confidentiality, and data quality expectations are identified in the CoC's [Privacy and Security Plan](#), and the CoC's [Data Quality Plan](#).

An overview of subrecipient HMIS and Security practices requirements are as follows:

- Each agency must have an **HMIS Agreement** signed by their Executive Director or other Representative on file
- Projects must have a **data collection notice** and a **Privacy Notice** on their website and in physical spaces; a sample of both notices are available on the CoC's website
- Computers that use HMIS must be set up with specific **security protocols**, such as password logins, firewall protection, etc.

- Each Subrecipient agency will be allocated a specific number of **HMIS user accounts**, based on agency staff and number of clients served (for details, see the HMIS User Allocation Plan)
 - Authorized HMIS users must attend a **Privacy & Security training** with the CoC prior to being given an account, and must complete the training annually thereafter
- All participants (clients) in the Subrecipient’s program must **sign the HMIS Data Agreement & Provider Release** before their information is entered into HMIS entering
- **100% of clients must be entered into HMIS within 5 days of entering the program**, with applicable annual updates recorded; all data entered in HMIS must match the data in a client’s file
- Subrecipients must provide **cash match dollars** to support the HMIS grant, based on the percentage of the total CoC annual funding their project obtains

For any questions regarding HMIS, please contact the CoC Data and Evaluation Manager.

<https://www.threecountycoc.communityaction.us/staff>

C. Reporting Requirements - Annual Performance Review

Every CoC-funded project must submit an Annual Performance Report (APR) within 90 days of the grant end date. This report is run in Clarity HMIS and is submitted through HUD’s Sage HMIS Reporting Repository. The HMIS Lead will forward the APR reporting form to each project towards the end of their contract to collect the necessary information. Questions asked include details about the grant itself, project bed and unit inventory (to determine what percentage of beds/units were utilized during that grant cycle), a fiscal spending breakdown by line item, sources of match, data quality completeness and timeliness, and a short narrative on performance accomplishments. Projects are required to complete the form and return it to the HMIS Lead within 45 days of contract end. As the HMIS Lead, the Three County CoC will submit the report in the SAGE Reporting system. The CoC is also available to assist if questions come up during this process.

D. Coordinated Entry Use and Participation Requirements

All CoC-funded projects are required by HUD to use the Three County CoC Coordinated Entry (CE) system to place individuals and families experiencing homelessness. The primary purposes of the CE system are to ensure assistance is allocated effectively and that services are easily accessible to all, regardless of where or how a person presents. CE practices help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

Per HUD’s expectation, the Three County CoC has established a “[Written Standard for Providing Services to Homeless and At-Risk Households accessed by a Coordinated Entry System](#)”, which describes the CoC’s policies and expectations that subrecipients must adhere to. Subrecipients must also include their use of the CE system, and any project-specific practices and procedures, in their written policies.

All CoC-funded subrecipients **are required** to participate in Coordinated Entry and select PSH, RRH, TH, and Joint TH & PH-RRH program participants using this CE system. All funded projects are expected to be active in recurring county/subpopulation CE Case Conferencing meetings. If there

are times that this is not possible, the subrecipient is required to stay abreast of the information being shared in case conferencing or at Coordinated Entry committees. In addition to the requirement to use CE for all CoC-funded beds, HUD expects any agency or organization funded by the CoC will also use CE for placements in their other housing programs, when applicable.

E. Housing First

Housing First is a programmatic, systems approach centered on providing people experiencing homelessness with housing quickly and then providing services as needed. The Three County CoC **requires** projects to adhere to a Housing First model that ensures low barrier access to CoC funded projects. Depending on the funded project there may be some eligibility criteria that would determine an individual or family to be ineligible or unsuitable for a particular housing option (for more information about program-specific eligibility, please refer to the [Interim Rule](#)). These program-specific eligibility criteria must be included in your application, approved by HUD, and still follow non-discrimination and fair housing laws. Generally, access to all CoC funded- housing, including YHDP projects, should be Housing First, meaning:

- Projects have low barriers to program entry for program participants.
- Services are provided in-house to promote housing stability and well-being.
- Housing is not contingent on compliance with services.
- Participants are expected to comply with standard lease or occupancy agreements
- Participants are provided with services and supports to help maintain housing and prevent eviction.

The CoC regularly evaluates projects to ensure they are using a Housing First approach through the annual site monitoring process. This includes reviewing program policies, lease, and occupancy agreements for language that adheres to Housing First practices.

F. Equal Access Rule and Anti-discrimination

HUD's [Equal Access Rule](#) requires equal access to HUD housing programs without regard to a person's actual or perceived sexual orientation, gender identity, or marital status. Housing providers that receive HUD funding must comply with the Rule. Specifically, HUD has issued three program rules providing equal access to housing, that together make up HUD's Equal Access Rule ("EA Rule" or "EAR").

State and federal fair housing laws are designed to prohibit discrimination based on certain protected class characteristics, including race, color, national origin, religion, age, gender, gender identity, sexual orientation, military history, disability, familial status, and source of income.

3. Project Operations

All Three County CoC subrecipients are required to have written Policies and Procedures. Subrecipient policies must adhere to the CoC Program Interim Rule and Three County CoC Subrecipient Policies and Procedures, but may include project specific elements. The Three County CoC requires all funded projects to submit written policies during site monitoring or as requested.

A. Program Participant Policies

This section details the policies a subrecipient must have in regard to program participants.

1. Intake Policy

All Three County CoC subrecipients are required to follow the CoC Funded Agency Intake Policy. Subrecipients may adopt this policy or create their own that fulfills the same requirements.

Depending on the project type and project-specific policies, the timeframe, timeline, and process for conducting intake procedures can vary. Beyond determining eligibility and compiling documentation (as detailed in the policy), subrecipients are expected to demonstrate and practice the following in their placement and intake procedures:

- Communicating with CoC staff to confirm acceptance of referral from Coordinated Entry system
- Completing the [Three County Universal Intake Packet](#)
- Entering program participant into HMIS, including reviewing release of information
- Conducting an initial assessment of Supportive Service need
- Documenting all relevant information in files

2. Participant Files

Subrecipients are required to maintain files for each program participant. Program participant files will be reviewed during site monitoring or requested as needed throughout the grant if there is a specified reason.

For a program participant file checklist, see Appendix F.

Subrecipient policies relating to participant files must also define expectations for file organization and demonstrate that the agency is adhering to file retention practice of five years following that participant's exit of the project.

3. Termination

The Participant Termination and Appeal Process (578.91) must be outlined in subrecipient policies and participant handbooks. These policies must note the timeliness of notifications to the CoC.

4. Grievance Process

Subrecipients must have a written client complaint/grievance policy, and a clear process of tracking these grievances.

B. Supportive Services

It is expected that all CoC-funded projects include supportive services, provided by either the subrecipient or a third-party service. Supportive services are necessary to assist program participants in obtaining and maintaining housing. Subrecipients must conduct an annual assessment of the supportive services needed by the residents of the project; the availability of such services; the coordination of services needed to ensure long-term housing stability; and make adjustments as appropriate.

Annual assessments and on-going supportive services plans must be available for review by the Three County CoC during site monitoring, or as requested.

1. Supportive Services Requirements by Project Type

In **Transitional Housing**, supportive services must be made available to residents throughout the duration of their residence in the project.

Permanent Supportive Housing projects must provide supportive services for all program participants to enable them to live as independently as possible throughout the duration of their residence in the project. Services may also be provided to former residents of transitional housing and current residents of PSH who were homeless in the prior months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

Rapid Rehousing projects must require the program participant to meet with a case manager no less than once per month to assist the program participant in maintaining long-term housing stability.

2. Provision of Supportive Services (578.53)

Subrecipients must have their client's voices incorporated in service development. This can include initiatives such as entrance, exit, or topic specific surveys, focus or advisory groups, and opportunities for leadership, as well as policies that demonstrate participated directed goal setting.

Subrecipients must demonstrate equitable practices in supportive services by signing an anti-discrimination policy, and having policies and a client handbook that outlines activities and practices focused on equity.

Subrecipients must identify trauma informed care in supportive services through policies of case coordination and have strengths based and client centered approaches.

Subrecipients must provide information (via policies and participant handbook) relating to supportive services offered versus expectations; this information must demonstrate assessment and support of the following:

- Social/emotional wellbeing
- Mental and physical health needs
- Peer/family/permanent positive connections
- Education/employment training opportunities
- Connection to a range of services/service integration

Subrecipients must include future/next steps planning by signing the [CoC Move-On Policy](#) and integrating it into their own policies.

Subrecipients must include staff training and evaluation by having trauma informed care and equity outlined in policies.

C. HMIS

Subrecipients must adhere, and demonstrate adherence in their policies, to the following procedures related to HMIS and Data Collection:

- Hard copies of personal identifying information (PII) must be protected
- Data collection/privacy notices must be posted
- All HMIS users must sign a user agreement in Clarity
- A written privacy statement must be created
- Documents related to HMIS must be on the agency's website
- An authorization form for the release of information must be signed for any client entered into database
- All signed client documents must be kept in a locked file
- Workstations must be located in secure locations
- Regular check ins on data quality must occur to ensure that data-quality plan expectations are being met

D. Requirements for Housing Units

This section details the requirements of policies related to housing units.

1. Housing Standards

Housing Standards are the HUD-established minimum quality standards for CoC.

Verification of Housing Standards is required both at initial occupancy and annually during the term of the lease. All CoC funded units must pass inspection prior to occupancy. Please note that if the subrecipient owns the building, they must get an outside party to conduct the inspection. Assistance cannot be provided for units that fail to meet Housing Standards, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the subrecipient verifies that all deficiencies have been corrected. Additionally, the party conducting the inspection does not have

to be formally certified or licensed; however, they must be familiar with the Housing Standards details and the inspection form.

If the unit has a Housing Choice Voucher (HCV) or another subsidy as part of the rental agreement, a CoC funded project may use a copy of the inspection conducted by the housing authority, and have on file, in order to meet expectations of the CoC. Otherwise, verification must be conducted annually.

The [inspection form](#) (HUD-52580A) can be used to ensure that a property meets HUD's Housing Standards; however, each jurisdiction may have a higher, locally-based property standard. It is recommended that subrecipients check with local building departments to ensure full compliance.

2. Environmental Reviews

The CoC Program Interim Rule describes Environmental Review (ER) requirements in Section [578.31](#). All activities under the Interim Rule are subject to ER and, by regulation, HUD grants are subject to the environmental review requirement before HUD funds and non-HUD funds can be spent.

Community Action, as the Collaborative Applicant, cannot reimburse funds for projects before an appropriate ER has been performed and approved. Subrecipients must supply all available, relevant information necessary for each property and communicate with their local municipality for the jurisdiction of the property, building owners, and contractors to complete the ER required by 24 CFR part 50. Subrecipients must carry out all mitigating measures required by HUD, based on the information obtained in the ER, or select an alternate eligible property. Subrecipients, their project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project until HUD has performed or approved an environmental review and the subrecipient has received HUD approval of the property.

The [CoC Program Environmental Review Flow Chart](#) can help projects identify what level of review and what format should be used to complete environmental reviews for CoC projects.

3. Fair Housing and Non-discrimination

All CoC Program funded projects are required to adhere to Fair Housing, nondiscrimination, and Equal Opportunity requirements. The Fair Housing Act prohibits discrimination in housing based on race, color, national origin, religion, sex, familial status, and disability. Subrecipients must implement projects in a manner that affirmatively furthers fair housing.

However, subrecipients may exclusively serve a particular homeless subpopulation in Transitional Housing or Permanent Supportive Housing if the housing addresses a need identified by the Three County CoC for geographic area, is included in the project application, and meets one of the following criteria:

- a. Housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that consideration of personal privacy and the physical limitations of the configuration of the housing make it appropriate for housing to be limited to one sex.

- b. Housing may be limited to a specific subpopulation, so long as submission does not discriminate against any protected class under federal nondiscrimination laws: race, color, national origin, religion, sex, familial status, and disability.
- c. Housing may be limited to families with children.
- d. If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child residents in the housing.
- e. Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.
- f. If housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, such as HOPWA, the housing may be limited to that subpopulation.
- g. Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing.

Additionally, subrecipients must comply with the accessibility requirements of the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Titles II and III of the Americans with Disabilities Act. Subrecipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

4. Rent Reasonableness

HUD will only provide rental assistance for a unit if the rent is reasonable. Projects using rental assistance may receive reimbursement for units rented above Fair Market Rent (FMR) but only if the gross rent meets rent reasonableness standards. All rental assistance projects must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units. If the rent reasonableness of a unit is a lower amount than FMR, projects must not exceed rent reasonableness. For the up-to-date FMRs, as they are recalculated each year, visit the [HUD website](#).

Three County CoC has implemented a rent reasonableness policy whereby providers can bill up to 110% of the determined rent reasonableness amount for gross rent (rent plus utilities). For further details, see the [CoC's Rent Reasonableness Policy](#).

Subrecipients that do not receive rental assistance or leasing funds are not required to meet FMR or rent reasonableness requirements.

5. Fiscal

All subrecipients must identify the process for Rent Certification and Collection (578.77) in their policies and participant handbooks. Leasing projects, when applicable, must identify the process for Treatment of Program Income (578.97). Subrecipients must also identify the documentation of match spending plan (578.73) in their policies. For more information on Fiscal matters, see Part IV.

E. CAPV Accounting Principles

Community Action recognizes as the recipient of federal funds, the Agency is responsible for compliance with applicable federal, state, and local laws and regulations, as well as fulfilling contractual obligations. In addition, as the Collaborative Applicant, Community Action recognizes the responsibility of ensuring all subrecipients maintain compliance with said laws, regulations, and contractual obligations. It is expected that the recipient and subrecipient follow sound accounting principles for effective and appropriate use of CoC funding. Outlined below:

- transparency and clear accountability;
- expenditures are planned and then checked against the plan;
- costs are reasonable and allowable, and allocated appropriately in accordance with the OMB Uniform Guidance at 2 CFR Part 200;
- funds do not sit idle and are protected from misuse (adherence to contract draw-down schedule);
- records are clearly understood by Recipient staff and accounting department; and
- reports meet data and analysis needs of program managers.

Subrecipients must have the capacity to meet the following key accounting principles of financial management:

- Costs should be allowable, reasonable, and allocated appropriately. All costs should be necessary and reasonable to carry out the award and allocable to the award-funding activities. It is extremely important that costs are adequately documented and conform with OMB Uniform Guidance at 2 CFR Part 200.
- A Subrecipient's budget is the stated plan for the use of grant funds. The budget should promote accountability and responsibility, plan for revenue and expenditure, and allow for checking actual performance. The budget should be allocated by Budget Line Items, also referred to as Eligible Activities. All costs related to a Budget Line Item must be drawn from that Budget Line Item. HUD Budget Line Items cannot be over-expensed and must not exceed the allowable budget.
- Subrecipient's accounting system should include at least the following: chart of accounts, cash receipts journal, cash disbursements journal, payroll journal, General journal (a record of all non-cash transactions), and General ledger (summarizing and detailing activities by account). Subrecipients who do not have financial accounting systems that can produce one or more of the previous must have an agreed upon alternative with the CoC.

4. Billing and Fiscal Requirements

A. Eligible Costs & Activities

Three County CoC Subrecipients are responsible for adhering to eligible costs and activities and understanding fiscal reporting and billing requirements. It is expected that subrecipients will refer to and abide by the [Interim Rule \(24 CFR Part 578\) for Continuum of Care Program](#) and [The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(2 CFR Part 200\)](#).

The OMB Uniform Guidance at 2 CFR Part 200, Part E: *Cost Principles* requires that all costs paid for with federal funds must be allowable, reasonable, and allocable. In addition, the recipient or subrecipient must maintain documentation that all requirements are met and maintained in the organizations records for the timeframe required by the program regulation.

All costs must be incurred during the grant period under which reimbursement is being requested. Any costs incurred prior to the start of the current grant contract cannot be reimbursed with CoC funds, regardless of when the invoice for those costs was received by the project.

- Grant managers and accounting personnel need to be familiar with the allowability of costs per the Interim Rule and provisions 2 CFR Part 200.400 – 475, [Cost Principles](#), particularly:
 - The list of specifically unallowable costs is found in 200.421 – 475, Selected Items of Cost, such as alcoholic beverages, bad debts, contributions, fines and penalties, etc.
 - Those costs requiring advance approval from federal agencies in order to be allowable in accordance with 2 CFR Part 200.407, require Prior Written Approval, such as participant support costs, equipment purchases, etc.
- For each federal award, an appropriate set of General Ledger accounts (or account segments) must be established in the chart of accounts to reflect the categories of allowable costs identified in the award or the award budget. All unallowable costs should be appropriately segregated from allowable costs in the general ledger in order to assure that unallowable costs are not charged to federal awards.

For more information on Cost Principles, including an overview of allowable, reasonable, and allocable costs, check out the following HUD Exchange self-paced training opportunity labeled “Cost Principles Module”:

<https://www.hudexchange.info/trainings/financial-management-curriculum/closer-look/>

For information regarding CoC Guidelines refer to Fiscal Guide: “Grant Guidelines for Expense”

<https://www.threecountycoc.communityaction.us/subrecipient-documents>

B. Three County CoC Match Policy & Requirements

The CoC Program has a 25% match requirement for all line items except for **leasing** funds. Projects must provide match to Community Action per request for reimbursement. Match can be cash or in-kind and must be documented fully and approved within project applications. Matching funds can only be used on eligible CoC Program costs. Subrecipients must be able to document all match expenses using the same policies and procedures used to document CoC program funding uses.

Visit the HUD Exchange for further information: [CoC Match - Match Requirements - HUD Exchange](#)

Match sources may change during the course of the project's contract. Subrecipients are responsible for notifying the CoC and documenting match source changes (via updated commitment letters and MOUs, if applicable), and should note match source changes on the Match Summary form submitted during billing.

For additional guidance, please see the Fiscal Guide "Grant Guideline for Expense"

<https://www.threecountycoc.communityaction.us/subrecipient-documents>

CAPV requires that all subrecipients submit full match back up for **the first two months** of each new contract period. If after the first two months of submission, CAPV can determine that the documentation provided demonstrates a clear understanding of eligible costs and appropriate documentation of costs, subrecipients will not be expected to submit match backup on a monthly basis. However, subrecipients must keep full match back-up on hand for monitoring or when requested by the CoC for HUD audits.

While match-up is only required the first two months, the Match Summary sheet continue to the submitted. This Excel spreadsheet should include total required match, match source, clearly show the type of expense and total amount by line item. See Fiscal Guide for Match Sample:

<https://www.threecountycoc.communityaction.us/subrecipient-documents>

HMIS Match

In addition to the required 25% program match for an individual grant, all grant subrecipients may be required to support match funding for the CoC's HMIS grant which supports the CoC in meeting HUD's data collection and reporting requirements. If needed, each Project will contribute funding amounts based on the percentage of the overall award they receive. If this is expected for contract period, CAPV will provide written notice to subrecipients during the NOFO application process.

Subrecipients are responsible for paying the HMIS Match within 45 days of the start of their grant cycle for that funding year. CoC funds cannot be used as match for another CoC grant. Therefore, CoC grant funds cannot be used to pay this obligation, and funds used to pay this cannot be used as match for any CoC grant funds.

C. Program Income

Program income is the income received by the Subrecipient directly generated by a grant-supported activity. Program income earned during the grant term will be retained by the subrecipient and added to the funds committed to the project by HUD and the recipient, and used for eligible activities in accordance with the requirements of the Interim Rule.

Rent collected from program participants is considered program income and may be used as program match for eligible CoC activities provided under § 578.97. Actual rent payments from participants must be tracked accurately and timely on the Rent Roll. Refer to the Fiscal Guide on the Three County CoC website [Subrecipient Documents | 3 County CoC \(communityaction.us\)](#).

Please visit HUD exchange for further information: [What are the eligible uses of program income in the CoC Program? - HUD Exchange](#).

D. Billing Submission Policies and Procedures

Each request for reimbursement must be accompanied by the properly executed invoices and documentation that conclusively substantiates amounts paid for and amounts being billed for each cost category. The sub-sections below describe the policies and procedures for submitting monthly requests for reimbursement.

1. General Submission Policy

The CoC's billing submission policy was updated March 2025, and presently requires all projects to submit full monthly invoices, including full match back-up for **the first two months** of each grant period. Specifically, projects must submit the following:

First Two Months - Billing Package Contents:

1. A Cover Page (Only required if Authorized Approver does not sign the LOCCS)
2. LOCCS
3. Invoice for Services Rendered (2nd tab on LOCCS excel form)
4. Summary sheet for each line item billed, Personnel Costs (if applicable), Match Form and Rent Roll
5. Back-up documentation for all billed expenses including
 - Invoices, Timesheets, Payroll Statements and General ledger (or cancelled checks, bank statements)
6. Back-up documentation for all match expenses including:
 - Invoices, Timesheets, payroll statements, and General ledger (or cancelled checks, bank statements)
 - Source listed on Match Summary

If after two months of submitting a full monthly request for reimbursement, there are no issues or findings and the back-up provided shows accurate, reasonable, and eligible use of funding, the CoC will allow projects to reduce the amount of back-up being submitted. Specifically, the CoC will require projects to submit the following for the remainder of the contract:

Remaining Contract Term - Billing Package Contents:

1. A Cover Page (Only required if Authorized Approver does not sign the LOCCS)
2. LOCCS
3. Invoice for Services Rendered (2nd tab on LOCCS excel form)
4. Rent Roll
5. Payroll Statements
6. Monthly Match Form
7. GL for Project Report

Projects must continue to maintain all billing package forms and documentation. It is **very important** that projects understand that even though the CoC will not require submission of the above back-up, **it is required that projects have that documentation on-hand each month in support of invoices submitted.** The CoC may request these documents for monitoring and HUD audits. For example, in the past the CoC has received audit requests from HUD requiring the

submission of projects full fiscal documentation within a two -week timeframe. Should the CoC receive such a request, projects will be required to provide the CoC with all requested back-up within 7 business days.

It is the responsibility of the Subrecipient to communicate any issues, problems or questions about what is considered supportive documentation to the Three County CoC prior to submission of the monthly invoice and corrective action is the responsibility of the subrecipient.

Three County CoC staff review costs billed on project invoices and will communicate with subrecipients concerning any ineligible costs identified within 10 days of receipt.

Visit the CoC's website to view/download billing forms [Subrecipient Documents | 3 County CoC \(communityaction.us\)](#). Please direct any questions about the submission policy to the CoC Program Director and CoC Business Manager ([Staff | 3 County CoC \(communityaction.us\)](#)).

Submission During State of Emergency or Other Crisis

In the event of a State of Emergency, social crisis, or other major event (such as the COVID-19 pandemic), the Three County CoC may allow for temporary changes to billing submission policies to ensure that projects can submit requests for reimbursement and receive payment in a timely manner. This policy is to accommodate the type of event in which project staff have limited access to their billing files or accounting software. Any temporary changes to policies will not waive documentation requirements. Rather, they will allow for the CoC to approve billing without some of the required back-up if the CoC can otherwise see the requests are appropriate, reasonable, and eligible. In this type of event, the CoC will expect projects to submit required back-up documentation once they have access to files. The CoC expects subrecipients to communicate with CoC staff about their operational capacity in a timely manner during such an event.

Cover Page

Subrecipients are required to submit a Cover Page with monthly requests for reimbursement if the LOCCs form is signed by anyone other than the Authorized Approver. The Cover Page should clearly state project name, preferred mailing address, fiscal contact, total amount requested, and period requested for. See the Fiscal Guide for an example.

LOCCS Form & Invoice for Services Rendered

Subrecipients are required to submit a LOCCS and an Invoices for Services Rendered form with each request for reimbursement. This two-tab excel form will be sent to subrecipients at the beginning of the grant cycle. The Invoice for Services Rendered tab is used to track project budgets and spending. It should accurately reflect, by line item, the total award, total previous requests, current request, YTD totals, and remaining balance. The Invoice for Services Rendered will also be used to ensure appropriate back-up is submitted for line-item expenses.

Summary Sheet for Each Line Item (First Two Billings – no errors) -

Along with the Cover Page, LOCCS, and Invoices for Services Rendered form, subrecipients are required to submit summary sheets for each line item that clearly show expenses by category within

each line item. Summary sheets should indicate both the total invoice amount of any particular expense and the amount of that expense being charged to the CoC grant (billed for reimbursement or as match). These forms are Excel spreadsheets which total category and line-item amounts.

Personnel Costs are tracked on a separate spreadsheet and totals billed and match amounts for each line item (Leasing, Rental Assistance, Operating, HMIS, and Project Admin) . These totals should be carried over to their respective Summary Sheets. (First Two Billings – no errors – Payroll Report Always required)

GL report for the Month – always required

Rent Roll (always required) can suffice for Rental Assistance and Leasing summaries if there are no further costs in these line items. Rent Roll delineates by bed/tenant the followings: FMR, Rent Reasonableness, Tenant Income, Participant Rent, Utility Allowance and/or utilities, Gross Rent, and Rent Collected monthly as well as YTD. See the Fiscal Guide on the CoC Website for more information. <https://www.threecountycoc.communityaction.us/subrecipient-documents>

Match Form –always required

Back-Up Documentation

Back-up documentation should demonstrate that all expenses paid for with CoC funding are eligible, allowable, and appropriate and support the following expectations:

- All expenses must be eligible costs for eligible activities
- All expenses must be drawn from the appropriate line items
- All expense reimbursement requests should reflect subrecipients’ budgets, per the project application
- All expenses and match must be incurred within the grant period

Back-Up Documentation-Time Worked for Direct Personnel

In addition to submitting a Payroll Summary and Payroll statement and/or General Ledger to support direct personnel costs, time sheets should be submitted with any direct personnel costs billed (only for First two Months if no errors The type of timesheet detail varies by Employee type:

<i>Type of Employee</i>	<i>Required Back-Up</i>
<i>Salaried and Hourly employees charged 100% to one Three County CoC grant</i>	<p>At the beginning of the grant period, a one-time email notifying the CoC of the fact that this is a salaried employee charged 100% to the CoC grant and that all activities are 100% eligible activities, with a description of those activities (or copy of job description). This email will be kept on file. Subrecipients should notify the CoC of any changes.</p> <p>With the first two monthly reimbursement requests, submit “basic timesheets” to demonstrate the number of hours</p>

	worked. After the first two months, these do not need to be included with billing packages but must be kept on hand. Basic timesheets are whatever timesheets employees submit per pay period and do not need to detail work activities.
<i>Hourly or Salaried employees that are NOT charged 100% to One CoC grant (split between two or more pay sources, including CoC grants)</i>	With the first two monthly reimbursement requests, a “Detailed Timesheet” or “Time Utilization Report”, which demonstrates hours worked and includes a description of eligible activities for all CoC hours. After the first two months, these timesheets must be kept on hand. “Detailed Timesheets” or “Time Utilization Reports” should clearly show how any time charged to the CoC grant was spent, and that the activities were eligible. The timesheets should show which hours worked are being expensed to the CoC grant.

Reimbursements

As a Subrecipient of CoC funds, it’s expected that each funded project be administered in accordance with their application, signed contract and budget, and CoC Subrecipient Policies and Procedures-including reimbursement requests.

Each Subrecipient is expected to submit **monthly** requests for reimbursement, unless otherwise agreed upon in your contract with CAPV. The Three County CoC acknowledges there may be rare situations in which subrecipients are not able to request reimbursement on a monthly or timely basis or submit a full request for reimbursement. These standards include protocols for state of emergencies and the CoC staff should be notified in a timely manner if any issues arise.

Performance Period

Subrecipients may only charge allowable costs incurred during the period of performance, within the period of the contract. If the subrecipient is submitting reimbursement for a cost incurred in a previous month within the period of the contract, that is allowable. If the subrecipient is submitting reimbursement for a cost incurred in a month prior to the start of the current contract, that is not allowable.

CoC Fiscal Contacts

The billing package will be reviewed by Three County CoC staff (for cost eligibility and completeness) and once approved, sent to CAPV’s Fiscal department for further review/processing. Requests for reimbursement can be submitted by email (ideally a scanned pdf package with minimal individual documents) or mail to the Three County CoC as follows:

Mail: ***Attn: CoC Program Director
Community Action Pioneer Valley, 393 Main Street Greenfield, MA 01301***

Email: ***CoC Business Manager
CoC Program Director***

For current staff contact information, please visit the CoC Website: [Staff | 3 County CoC \(communityaction.us\)](#). If you have any questions about billing, contracts, fiscal standards, etc., contact the CoC Program Director and CoC Business Manager.

Timeline of Payment

The Three County CoC is committed to processing requests for reimbursement as quickly as possible. According to the 2 CFR Part 200, Community Action must make payment within 30 calendar days after receipt of billing, unless the request is missing information, documentation, or has accounting errors. If requests for reimbursement need any adjustments, CoC staff will contact subrecipients within five business days of submission. CAPV will reimburse subrecipients for their disbursements upon CAPV's Fiscal Department's approval of a properly completed billing package with supporting documentation as outlined in the annual contract.

The CAPV's Fiscal Department pays invoices bi-weekly on every other Friday. Billing packages must be fully approved (by both CoC staff and CAPV's Fiscal Department) by Friday of the previous week for payment. If subrecipients have any questions or concerns about the timeline of payment or other payment issues, contact the CoC Program Director and CoC Business Manager: [Staff | 3 County CoC \(communityaction.us\)](#).

Method of Payment

CAPV strongly prefers that subrecipients receive their disbursement via direct deposit, though this is not required. For direct deposit forms, please contact CoC Business Manager: [Staff | 3 County CoC \(communityaction.us\)](#). Any subrecipients that choose not to receive reimbursement through direct deposit will receive a hard check addressed to the mailing address on file with the CoC.

CAPV Recordkeeping

Community Action maintains records of subrecipient contracts, budgets, amendments, and requests for reimbursement in accordance with HUD requirements. Three County CoC staff maintain an accounting spreadsheet of all CoC grant awards and all monthly requests for reimbursement, including a breakdown of expenses by activity category and match.

Appendix A: ABC'S of HUD

AHAR	Annual Homeless Assessment Report
APR	Annual Performance Report
ARD	Annual Renewal Demand
CA	Collaborative Applicant
CE	Coordinated Entry
CH	Chronic Homelessness
CoC	Continuum of Care Program
BLI	Budget Line Item (in LOCCS)
CDBG	Community Development Block Grant
CE	Coordinated Entry
CFR	Code of Federal Regulations
EOHHS	Executive Office of Health and Human Services
ES	Emergency Shelter
ESG	Emergency Solutions Grant Program
FMR	Fair Market Rent
FPRN	Final Pro Rata Need
FUP	Family Unification Program (vouchers)
FY	Fiscal Year
GIW	Grant Inventory Worksheet
HCV	Housing Choice Voucher Program (Section 8)
HEARTH (Act)	The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009
HF	Housing First
HIC	Housing Inventory Count
HMIS	Homeless Management Information System
HOPWA	Housing Opportunities for Persons with AIDS
HQS	Housing Quality Standards
HUD	U.S. Department of Housing and Urban Development
LOCCS	Line of Credit Control System
LSA	Longitudinal Systems Analysis
NED	Non-elderly Disabled
NOFO	(HUD) Notice of Funding Opportunity
OMB	Office of Management and Budget
PIT	Point-In-Time Count
PPRN	Preliminary Pro Rata Need
PSH	Permanent Supportive Housing
RFP	Request for Proposals
RRH	Rapid Re-Housing
SRO	Single Room Occupancy

SSO	Supportive Services Only
TAC	Technical Assistance Collaborative
TBRA	Tenant-Based Rental Assistance
TH	Transitional Housing
UFA	Unified Funding Agency
VA	Veterans Affairs (U.S. Department of)
YAB	Youth Action Board
HUD-VASH	HUD Veterans Affairs Supportive Housing Programs
VAWA	Violence Against Women Reauthorization Act of 2013
YHDP	Youth Homelessness Demonstration Program

Appendix B. Glossary of CoC and HUD Terminology

Act:	The McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C 11371 <i>et seq.</i>)
Affordable Housing:	In general, housing for which the occupant(s) is/are paying no more than 30 percent of their income for gross housing costs, including utilities. Some jurisdictions may define affordable housing based on other locally determined criteria.
AHAR	The Annual Homeless Assessment Report is a report to the U.S. Congress on the extent and nature of homelessness in America. The report is prepared by HUD and provides nationwide estimates of homelessness.
Allocation:	The process of assigning a cost, or a group of costs, to one or more cost objective(s) in reasonable proportion to the benefit provided or other equitable relationship.
Annual Performance Report (APR):	A reporting tool that HUD uses to track program progress and accomplishments and inform the Department's competitive process for homeless assistance funding.
Annual Renewal Amount:	The amount that a grant can be awarded on an annual basis when renewed. Includes funds only for those eligible activities (operating, supportive services, leasing, rental assistance, HMIS, and administration) that were funded in the original grant (or the original grant as amended), less the unrenovable activities (acquisition, new construction, rehabilitation, and any administrative costs related to these activities).
Applicant:	An eligible applicant that has been designated by the Continuum of Care to apply for assistance on behalf of the Continuum.
Case Conference:	A meeting held between Coordinated Entry providers to discuss client details for the purpose of coordinating care.
Case Manager:	One who assists in the planning, coordination, monitoring, and evaluation of services for a participant with emphasis on quality of care, continuity of services, and proper administration of their goals and programming.
Chronic Homelessness	See definition in Section B.
Collaborative Applicant:	The eligible applicant that has been designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application, and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. For the Three County CoC, this is Community Action Pioneer Valley.
Consolidated Application:	The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved or ranked, or rejected. The Collaborative application is responsible for submitting the both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.
Consolidated Plan	A document written by state or local government (Northampton and Pittsfield are two cities that have these plans) describing the housing needs of the low- and moderate- income residents, outlining strategies to meet these needs, and listing all resources available to implement the strategies. This document is required in order to receive HUD Community Planning and Development funds.
Continuum of Care:	The group organized to carry out the responsibilities required of the CoC and that is composed of representatives of organizations, including nonprofit homeless providers, victim services providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly

	homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.
Coordinated Entry (CE):	A centralized or coordinated process designed to coordinated program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.
CE Partner:	Organizations and agencies which participate in the Three County CoC CE system. Examples of participation include, referrals to the CE system, CoC funded projects, housing providers, emergency housing programs, and case workers.
Corrective Action:	Action taken by the auditee that: corrects identified deficiencies; produces recommended improvements; or demonstrates that audit findings are either invalid or do not warrant auditee action.
Data Warehouse	Information system storing HUD program and operational data. In our CoC, Green River is a data warehouse that is used to consolidated data from a number of sources, including HMIS and other systems.
100 %Dedicated	A permanent supporting housing project in which all housing beds are dedicated specifically for use by chronically homeless individuals and families with a CoC's geographic area.
Dedicated PLUS	A permanent supportive housing project with 100% of the beds dedicated to serve individuals, households with children, and unaccompanied youth that at intake meeting one of the following categories: 1. Experiencing chronic homelessness; 2. Residing in a transitional housing project that will be eliminated and meets definition of chronically homeless; 3. Residing in a place not meant for human habitation, emergency shelter, or Safe Haven and had been admitted in PH project within last year; 4. residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness; 5. Residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the past three years; 6. Receiving assistance through the Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the criteria above at initial intake.
Developmental Disability:	As defined in section 102 of the Development Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 1502): A severe, chronic disability of an individual 5 years of age or older that meets the following conditions: <ul style="list-style-type: none"> i. Is attributed to a mental or physical impairment or combination; ii. Is manifested before the individual attains age 22; iii. Is likely to continue indefinitely; iv. Results in substantial functional limitations in three or more of the following: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, and economic self-sufficiency; and v. Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated.

Disability:	A physical or mental impairment that substantially limits one or more of the major life activities of such for an individual.
Disabling Condition:	Defined as: <ol style="list-style-type: none"> 1. A disability as defined in section 223 of Social Security Act; 2. A physical, mental, or emotional impairment which is expected to be of long-continued and indefinite duration, substantially impedes an individual's ability to live independently, and of such a nature that the disability could be improved by more suitable conditions; 3. A developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; 4. The disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or 5. A diagnosable substance abuse disorder.
Eligible Applicant:	A private nonprofit organization, State, local government, or instrumentality of the State and local government.
Emergency shelter:	Any facility whose primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.
Emergency Solutions Grant:	A federal program designed to help improve the quality of existing emergency shelters, to make additional shelters available, to meet the costs of operating shelters, and to provide essential social services to homeless individuals. ESG also provides short-term homeless prevention assistance to persons at imminent risk of losing their own housing due to eviction, foreclosure, or utility shutoffs.
e-snaps	The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS). This system supports the CoC Program funding applications and grant awards process for the HUD CoC Program.
Fair Housing Act:	1968 act (amended in 1974 and 1988) that protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. In addition, housing providers must make reasonable accommodations and allow reasonable modifications that may be necessary to allow persons with disabilities to enjoy their housing.
Fair Market Rent (FMR)	A calculation of gross rent used to determine the payment standard amounts for government assisted housing programs, such as the Section 8 program and other federal subsidized housing.
Family Reunification Program (FUP)	A program under which Housing Choice Vouchers (HCVs) are provided to families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child or children in out-of-home care (foster care, residential program, etc.) or the delay in the discharge of the child or children to the family from out-of-home care.
Geographic preference:	The area, within the Continuum, that an individual or family wants to reside and therefore may choose housing opportunities only available in that area.
HEARTH Act	The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 amends and reauthorizes the McKinney-Vento Homeless Assistance Act with substantial changes, including: a consolidation of HUD's competitive grant programs; the creation of a Rural Housing Stability Assistance Program; a change in HUD's definition of homelessness and chronic homelessness; a simplified match

	requirement; an increase in prevention resources; and an increase in emphasis on performance.
HMIS (Homeless Management Information System):	A computerized data collection application designed to capture client-level information over time on the characteristics of service needs of men, women, and children experiencing homelessness, while also protecting client confidentiality. It is designed to aggregate client-level data to generate an unduplicated count of clients served within a community's system of homeless services. An HMIS may also cover a statewide or regional area, and include several CoCs. The HMIS can provide data on client characteristics and service utilization.
HMIS Lead:	The entity designated by the CoC in accordance with the Interim Rule to operate the Continuum's HMIS on its behalf
Housing First (HF):	An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements.
Housing Quality Standards	The HUD minimum quality standards for housing for tenant-based programs such as the Section 8 program. HQS standards are required both at initial occupancy and during the term of the lease and to ensure that the housing unit is decent, safe and sanitary.
HUD	The U.S. Department of Housing and Urban Development, established in 1965, is a cabinet-level agency that oversees federal programs designed to help Americans with their housing needs. HUD's mission is to increase homeownership, support community development, and increase access to affordable housing free from discrimination. The agency enforces federal housing laws, operates mortgage-supportive initiatives and distributes millions of dollars in federal grants.
Improper payment:	Improper payment means any payment that should not have been made or that was made in an incorrect amount (including overpayments or underpayments) under statutory, contractual, administrative, or other legally applicable requirements and includes payment to ineligible party, any payment for an ineligible good or services, any duplicate payment, any payment for good or services not received, any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper.
In-Kind match	The value of any real property, equipment, goods, or services contributed to a CoC Program grant that would have been eligible costs under the CoC Program if the recipient/subrecipient was required to pay for such costs with CoC Program grant funds.
LSA:	The Longitudinal Systems Analysis Report, produced from a CoC's HMIS and submitted annually to HUD, provides critical information about how people experiencing homelessness use their system of care.
No Wrong Door:	A model of integrated and coordinated service delivery based on the premise that every door in the service system should be the right door. It represents a philosophy whereby service providers are committed to actively engaging people to ensure they receive appropriate and adequate support for their needs regardless of their initial entry point.
NOFO:	The Notice of Funding Opportunity (NOFO) is a notice published each year in grants.gov for HUD's Discretionary Funding Programs. This notice describes the type of funding available on a competitive basis. The deadline for submission is typically 60 to 90 days from the date of NOFO publication.

Pass-through entity:	A non-federal entity that provides a sub award to a sub-recipient to carry out part of a Federal program.
Permanent Housing:	Community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of a least one year, which is renewable for terms that are a minimum of one month long, and terminable only for cause.
Permanent Supportive Housing (PSH):	Permanent housing, as described above, in which supportive services are provided to assist homeless persons with a disability to live independently.
Point-In-Time Count (PIT):	A count of sheltered and unsheltered homeless persons carried on out one night in the last 10 calendar days of January or at such other time as required by HUD.
PPRN	Preliminary Pro Rata Need (PPRN) is the formula that HUD uses to establish a CoC's initial need amount, a part of determining a CoC's maximum award amount in a given fiscal year.
Program participant:	An individual (including an unaccompanied youth) or family who is assisted with CoC funds.
Project (CoC):	A program that is funded as the sub-recipient for HUD funds, that has applied for and been approved by the Continuum to provide Housing and Supportive Services to a priority population.
Protected Classes:	Demographic categories of persons established by civil rights statutes against whom discrimination is prohibited. Those categories are: Race, Color, National Origin, Religion, Sex, Familial Status, and Disability.
Rapid Re-Housing (RRH):	A program that rapidly connects individuals and families experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services.
Reallocation	The process by which a CoC shifts funds in a whole or in part from existing CoC-funded projects that are eligible for renewal to create one or more new projects. CoC's can pursue reallocations through the annual CoC Program Competition. A reallocated project must be a new project that serves new participants and has either a rapid re-housing or permanent supportive housing program design. A new reallocation project may use resources from an existing project, including staff, but it is not simply a continuation of an existing project that serves existing participants.
Recipient:	The agency or organization awarded the CoC HUD funds. In this Continuum, the Collaborative Applicant is the recipient.
Renewal Programs:	Previously funded projects and activities that a community is proposing for continuation of funding.
Single Room Occupancy (SRO):	A form of housing that is typically aimed at residents with low or minimal incomes who rent small rooms typically with shared kitchen and bathroom facilities, but not always.
Sub award:	An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity.
Subrecipient:	A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub grant from the recipient to carry out a project
Subsidized Housing:	Housing for low- or very low- income households where the rent is capped at a percent of the occupant's income (often 30-40%). Public housing is a type of subsidized housing.

Supportive Service Only (SSO):	A program that provides services to homeless individuals and families living in the community. SSO recipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons and families, to link clients with housing or other services, and to provide ongoing support.
Transitional Housing:	Housing where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families to permanent housing within a reasonable timeframe (usually 24 months).
Trauma-Informed:	Approaches delivered with an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence and physical, social, and emotional impact of trauma. This approach recognizes signs of trauma in staff, clients, and others and addresses this by integrating knowledge about trauma into policies, procedures, and practices. Trauma-informed practices place priority on restoring survivor’s feelings of safety, choice, and control.
VASH	HUD’s Veterans Affairs Supportive Housing Program (VASH) is a joint program between HUD and the U.S. Department of Veterans Affairs (VA). HUD provides Housing Choice Vouchers and VA provides case management and outreach. This program targets veterans who are currently homeless.
Victim service provider:	A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, “battered women’s shelters”, domestic violence transitional housing programs, and other programs.

Appendix C. Definitions and Categories of Homeless (Per HUD)

Homeless Person:

As defined by McKinney Act (42 U.S.C 11302), a homeless person is:

- i. A person sleeping in a place not meant for human habitation or in an emergency shelter; and
- ii. A person in transitional housing for homeless persons who originally came from the street or an emergency shelter.

Chronically Homeless Individual:

1. A “homeless individual with a disability”, as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. Lives in a place not meant for human habitation, safe haven, or in an emergency shelter, **AND**
 - ii. Has been homeless and living as described above 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 above.
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. 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 in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

CATEGORIES OF HOMELESSNESS PER HUD

The following describes the categories of homelessness as defined by HUD. For information about how to document homelessness per category type, please refer to [this form](#).

Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- iii. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; and
- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3: Homeless Under Other Federal Definitions

Not currently an eligible category

Category 4: Fleeing/ Attempting to Flee Domestic Violence

Any individual or family who:

- i. Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks to obtain other permanent housing

Appendix D. List of CoC Policies and Regulations

[CoC Program Interim Rule Amendment to § 578.1\(c\): Increasing Mobility Options for Homeless Individuals and Families with Tenant-Based Rental Assistance](#)

[Defining “Chronically Homeless” Final Rule](#)

[Homeless Definition Final Rule](#)

[Notice for Further Comment on the PPRN Formula](#)

Appendix E. HUD Fiscal Policies and Resources

Key Documents:

[CoC Program Interim Rule 24 CFR part 578](#)

[Code of Federal Regulations Part 200 - Uniform Administration Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Website:

[HUD Exchange](#)

Laws:

[The McKinney-Vento Homeless Assistance Act, As Amended by S.896 Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act 2009](#)

[The Fair Housing and Equal Opportunity Acts \(federal\)](#)

[Cranston-Gonzalez National Affordable Housing Act of 1990, as amended \(P.L.101-625\)](#)

[Massachusetts Fair Housing Laws](#)

Appendix F. Program Participant File Checklist

Client Name or ID:

Project Name:

Case Manager:

Project Entry Date:

Client Documents:

	Item/Document	Timing	Citations
	Homeless Status Verification Form	At intake	24 CFR 578.103(a)(3)
	Chronically Homeless Status Verification	At intake	24 CFR 578.103(a)(4)
	Documentation of Disability	At intake	24 CFR 578.103(a)(4)(i)(B)
	Annual Income Determination	At intake and annually	24 CFR 578.103(a)(7)
	Services Provided	Ongoing	24 CFR 578.103(a)(10)
	Annual Assessment of Service Needs	At intake and annually	24 CFR 578.53(a)(2)
	Termination Notices	At notification of termination	24 CFR 578.103(a)(8)(ii)

Unit Documents:

	Item/Document	Timing	
	Housing Standards Inspection	Before leasing, annually, and as requested	24 CFR 578.103(a)(9)
	Lease or Occupancy Agreement	Initial Agreement, and then annually	24 CFR 578.49(b)(5) 24 CFR 578.51(l); 24 CFR 578.77(a)
	Utility Allowance	Used each time determining FMR and rent reasonableness	24 CFR 578.37(a)(1)(ii)(B)
	FMR Determination	Before leasing, and as frequently as rent increases are applied	24 CFR 578.49(b)(2)
	Rent Reasonableness Determination	Before leasing, and as frequently as rent increases are applied	24 CFR 578.51(g)

Client Records must be maintained for at least 5 years following the participant's exit from the project. For participants actively enrolled, the above should be retained regardless of length of stay in the project.

Subrecipient Policy Signature Page



Project representatives will be required to read and sign the Three County CoC Subrecipient Policies and Procedures prior to the start of their grant sub-contract with CAPV.

By signing, projects agree to abide by Three County CoC Policies and Procedures confirm that they understand all of the subrecipient fiscal requirements and expectations.

Subrecipient Signature:

(Print Name) (Position)

(Signature) (Date signed)