

**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.

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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 year 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, 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 sponsor 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 7 years.

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically §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.
 - As of 2024, the CoC is not requesting all documents from all subrecipients. More information is available in the What to Expect During CoC Monitoring guide, on the CoC website: [Subrecipient Documents | 3 County CoC \(communityaction.us\)](https://www.communityaction.us/subrecipient-documents).
- 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).

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](#), the OMB, 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).

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.

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 the 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.

An informational video focused on the Coordinated Entry System is also available on the CoC website [here](#).

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 weekly 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.

A. 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 and 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 (for more information, please see the Subrecipient Monitoring Manual).

B. 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. The Three County CoC commits to a policy of non-discrimination for all CoC projects and activities, detailed in the [Anti-Discrimination Policy](#).

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. All program participant files should include:

- Three County CoC Universal Intake Packet (including homeless or chronic homeless verification and income verification);
- Annual assessment of service needs;
- HUD Rent Calculator;
- FMR and rent reasonableness calculations (for information on how to calculate, see Part 3.D.4);
- Occupancy agreement or lease;
- HQS documentation (for information on how to document, see Part 3.D.1);
- Environmental Review documentation (for information on how to document, see Part 3.D.2);
- [HMIS Release of Information](#);
- Action plan and case notes;
- Program specific assessments;

- Housing search form (TH and tenant-based projects);
- Evidence of utilization of Housing First practices.

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 seven years.

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 Quality Standards

Housing Quality Standards (HQS) are the HUD-established minimum quality standards for CoC and Emergency Solutions Grant (ESG) Programs. See [here](#) for more information.

Verification of **HQS** is required both at initial occupancy and annually during the term of the lease. All CoC funded units must pass HQS inspection prior to occupancy. Please note that if the subrecipient owns the building, they must get an outside party to conduct the HQS inspection. Assistance cannot be provided for units that fail to meet HQS, 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 HQS inspection does not have to be formally certified or licensed; however, they must be familiar with the HQS details and the inspection form (below).

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 HQS 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 HQS; 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 Omni-Circular at 24 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.

- Subrecipient's budget are 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.
- 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 Omni-Circular at 24 CFR Part 200 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 documented and maintained in the organizations records for the timeframe required by the program regulation. See 24 CFR 578.103 for more information.

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.

1. Allowable Costs

The following steps should be taken to identify and segregate costs that are “**allowable**” and unallowable with respect to each federal subaward:

- The budget and sub grant or subcontract for each sub award must be reviewed for costs specifically allowable or unallowable.
- 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.
- No costs will be charged directly to any federal award until the cost has been determined to be allowable under the terms of the award, Interim Rule, and/or 2 CFR Part 200.400 – 475, Cost Principles.
- 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.

Criteria for Allowability

All costs must meet the following criteria from 2 CFR Part 200.402 – 406, Basic Considerations, in order to be treated as allowable direct or indirect costs under a federal award:

- Subrecipients need to ensure costs are “**reasonable**”. To determine if costs are reasonable, subrecipients must be able to meet the requirements under 2 CFR 200.404: A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded. Factors to consider include the following:
 - Whether the cost is of a type that is generally considered as being necessary for the operation of the Agency or the performance of the award.
 - Restraints imposed by such factors as generally accepted sound business practices, arm’s length bargaining, federal and state laws and regulations, and the terms and conditions of the award.
 - Whether the individuals concerned acted with prudence in the circumstances.
 - Consistency with established policies and procedures of the Agency, deviations from which could unjustifiably increase the costs of the award.
- The cost must be “**allocable**” to an award by meeting one of the following criteria:
 - The cost is incurred specifically for a federal award,
 - The cost benefits both the federal award and other work and can be distributed in reasonable proportion to the benefits received, or
 - The cost is necessary to the overall operation of the Agency, except where a direct relationship to any particular program or group of programs cannot be demonstrated.
- The cost must conform to any limitations or exclusions of 2 CFR Part 200 Subpart E Cost Principles, or the federal award itself.
- Treatment of costs must be consistent with policies and procedures that apply to both federally financed activities and other activities of the Agency.
- Costs must be consistently treated over time.
- The cost must be determined in accordance with generally accepted accounting principles (GAAP).
- Costs may not be included as a cost of any other federally financed program in the current or prior periods.
- The cost must be adequately documented.

2. Eligible Activities and Required Back-Up Documentation

CoC funds are available to pay for the eligible costs listed in Interim Rule § 578.39 through §578.63 when used to:

- Establish new housing or new facilities to provide supportive services;
- Expand existing housing and facilities in order to increase the number of homeless persons served;

- Bring existing housing and facilities into compliance with State and local government health and safety standards, as described in § 578.87;
- Preserve existing permanent housing and facilities that provide supportive services;
- Provide supportive services for residences of supportive housing for homeless persons not residing in supporting housing; and
- Continue funding permanent housing when the recipient has received funding under this part for leasing, supportive services, operating costs, or rental assistance.

Applicable eligible Activities and required back-up documentation for monthly requests for reimbursement are described below. In addition to reviewing the information below, subrecipients are strongly encouraged to review and refer to the [Interim Rule \(24 CFR Part 578\) for Continuum of Care Program](#) when creating project budgets and before the start of each contract. It is expected subrecipients understand eligible and ineligible costs for each line item in their budget.

3. Acquisition – 1010, Rehabilitation – 1020, and New Construction – 1021

As of spring 2024, The Three County CoC does not have any Acquisition, Rehabilitation, or New Construction projects. If any are added in the future, this section will be updated.

4. Rental Assistance – 1040

Grant funds may be used for rental assistance for homeless individuals and families. A subrecipient must serve at least as many program participants as shown in its application for assistance. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources. Rental assistance may be short-term, up to 3 months of rent; medium-term, 3 to 24 months of rent; or long-term, for longer than 24 months of rent. Rental assistance may be tenant-based, project-based, or sponsor-based, and may be for transitional or permanent housing.

The amount of rental assistance in each project will be based on the number and size of units proposed by the applicant to be assisted over the grant period. The amount of rental assistance in each project will be calculated by multiplying the number and size of units proposed by the FMR of each unit on the date the application is submitted to HUD, by the term of the grant.

Eligible Costs

Grant funds may be used to pay for: the rental subsidy; security deposits in amount not to exceed 2 months of rent (in Massachusetts, 1 month of rent); payment of first month rent; and advance payment of the last month's rent. Funds may be used for the costs associated with carrying out rental assistance activities, including those conducted by a subrecipient or contractor. Eligible costs under the rental assistance line item include processing rental payments, examining participant income and family composition, providing housing information and assistance, inspecting units for compliance with housing quality standards, and collecting and processing occupancy fee payments.

Subrecipients may use grant funds in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This is a one-time cost per participant, incurred at the time a participant exits the housing unit.

Ineligible Costs

Furniture and starter items, like dishes, cookware, linens, bedding, or consumable supplies used by the program participant, are not specified as eligible costs in the CoC Program interim rule. CoC Program Rental Assistance grant funds cannot be used to reimburse costs associated with such items consumed by the program participant.

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.

Rent Reasonableness and Fair Market Rent

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, considering 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, 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.

Vacant Units

If a unit assisted with rental assistance is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

Program Participant Rent

Program Participant Rent must be calculated as provided in § 578.77 (Visit the Virtual Binders on the HUD Exchange for additional guidance [CoC Rent Calculation - Overview - HUD Exchange](#)). Projects receiving Rental Assistance funds should not be collecting rent from program participants as program income. Program income is only allowable for Leasing Projects. Under Rental Assistance Projects, participants pay rent directly to the landlord/sublessor.

Back Up Documentation

Subrecipients are required to submit the following with monthly requests for reimbursement:

- A Rent Roll; and
- General Ledger (or cancelled checks/bank statement) showing proof of rent payment to landlord.

In addition, subrecipients are required to submit the following at the start of a new contract, or when there is a new program participant, or when terms of the tenancy change:

- leases or subleases for all program participants;
- rent reasonableness calculations for each unit;
- utility allowances for all applicable units; and
- program participant rent calculations.

For more information on the use of Rental Assistance funding, please refer to § 578.51 of the Interim Rule and visit the HUD Exchange: [CoC Eligible Activities - Rental Assistance - HUD Exchange](#)

5. Leasing – 1100

When the subrecipient is leasing a structure, or portions thereof, grant funds may be used to pay up to 100% of the costs of leasing a structure or structures to provide housing or supportive services to people experiencing homelessness.

Eligible Costs

CoC grant funds for leasing dollars may be used to:

- Lease Structures when grants are used to pay rent for all or part of a structure or structures, and the rent paid must be reasonable in relation to rents being charged in the area for comparable space. The rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space.
- Lease individual units when grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size, type, quality, amenities, facilities, and management services. Rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents.
- Pay for utilities if electricity, gas, and water are included in the rent. If utilities are not provided by the landlord, these utility costs are an operating cost and should be billed to the operating line item, except for supportive service facilities. If the structure is being used as a supportive services facility, then these utility costs are a supportive service cost and should be billed to the supportive services line item.
- Pay security deposits and first and last month rent: Recipients and subrecipients may use grant funds to pay security deposits, an amount not to exceed 2 months of actual rent (in Massachusetts it may not exceed 1 months of actual rent). An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of first month's rent.

Ineligible Costs

Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause. For more information on requesting an exception, please refer to the Interim Rule § 578.49.

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.

Rent Reasonableness and Fair Market Rent

HUD will only provide rental assistance for a unit if the rent is reasonable. 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 comparable space. **When requesting reimbursement with leasing dollars, gross rent cannot exceed the Fair Market Rents (FMR) for that area or rent reasonableness standards.** In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space.

All leasing 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. Projects may not exceed rent reasonableness. If the rent reasonableness of a unit is a lower amount than FMR, projects must not exceed rent reasonableness. See Section 4.2 for more information on determining rent reasonableness. For the up-to-date FMRs, visit [the HUD website](#).

Subrecipients that do not receive rental assistance or leasing funds are not required to meet FMR or rent reasonableness requirements. **However, if a subrecipient with leasing dollars intends to use program participant rental income as match, the subrecipient is required to meet FMR and rent reasonableness requirements.**

Utilities

Projects receiving leasing funds can pay for utilities in one of the following ways:

- If the utilities are included in the lease, they are the responsibility of the landlord and can be paid for as part of rent. This means that they can be paid for out of the leasing budget line item of the grant.
- If utilities are **not** included in the lease, the recipient may pay for the utility costs out of the operating budget line item. There is nothing in the CoC Program interim rule that prohibits the subrecipient from using operating funds to pay for utilities (gas, water, and electricity), that are not included in the lease that are above FMR so long as the gross rent is reasonable. **This means projects may request reimbursement for utility costs that exceed FMR as long as contract rent and utility costs (gross rent) do not exceed rent reasonableness.** Projects

must demonstrate that the gross rent meets the rent reasonableness standards and is comparable to similar units or structures.

If a program participant is paying utilities, projects may pay a utility allowance one of two ways:

1. Pay the program participant directly.
2. Pay the utility company on behalf of the program participant.

Vacant Units

Leasing projects may request reimbursement for vacant units assisted with leasing funds if they have been vacant for 30 days or less. In some circumstances, the Three County CoC may allow projects request reimbursement for units that have been vacant for more than 30 days but not less than 60 days, providing the projects submit an appropriate and reasonable explanation for the extended vacancy. All vacancies should be tracked clearly and accurately on the rent roll (e.g., in lieu of tenant name list "Vacant-Month 1").

Program Participant Rent

Rent must be calculated as provided in § 578.77. Rents collected from program participants is Program Income and may be used as match for eligible activities as provided under §578.97, and must be recorded accurately and timely on the Rent Roll.

Back Up Documentation

Subrecipients are required to submit the following with monthly requests for reimbursement:

- Rent Roll (include rent collected from program participants)
- General Ledger, cancelled checks, or bank statement showing proof of rent payment to landlord

In addition, subrecipients are required to submit the following at the start of a new contract, or when there is a new program participant, or when terms of the tenancy change:

- Leases or subleases for all program participants;
- FMRs for each unit;
- Utility allowances for all applicable units; and
- Program participant rent calculations.

Please refer to Three County CoC Rent Roll example in Appendix G. For more information on the use of Leasing funding, please refer to § 578.49 of the Interim Rule and visit the HUD Exchange [CoC Eligible Activities - Leasing - HUD Exchange](#).

6. Operating Costs – 1030

Grant funds may be used to pay the costs of the day-to-day operations of transitional and permanent housing in a single structure or individual housing units.

Eligible Costs

Eligible Operating costs include: the maintenance and repair of housing; property taxes and insurance; scheduled payments to a reserve for replacement of major systems of the housing;

building security for a structure where more than 50 percent of the units or area is paid with grant funds; electricity, gas, and water; furniture; and equipment. Operating funds may also be used to reimburse reasonable out-of-pocket expenses incurred in connection with the temporary relocation of a program participant.

If utilities are not included in the lease, the recipient may pay for the utility costs out of the operating budget line item. There is nothing in the CoC Program interim rule that prohibits the subrecipient from using operating funds to pay for utilities (gas, water, and electricity), that are not included in the lease that are above FMR so long as the gross rent is reasonable. This means projects can use operating funds to pay for utilities that take the gross rent above FMR, so long as the gross rent is still reasonable when compared to other comparable units or structures.

Ineligible Costs

Rental Assistance and Operating Funds may not be used in the same unit/structure. Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

YHDP funded joint component projects may have both rental assistance and operating line items. However, the operating costs may only be used to operating the transitional housing part of the joint component, along with leasing dollars. Operating funds may not be used on any program component or rental unit receiving rental assistance.

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.

Back-Up Documentation

All purchases of materials, supplies, goods, and services must be accompanied by:

- A summary sheet, which should show each expense under the Operating line item and tie out with the back-up provided. See Appendix G for an example of an Operating Expense Summary sheet.
- An invoice that clearly demonstrates the expense is approved based on the project budget, was incurred within the sub grant cycle, is eligible based on the Interim Rule, and is allowable based on the 2 CFR Part 200.
- Proof that the payment has been made (e.g., GL, Bank Statement, Cancelled Check)

All costs of labor and staffing under Operating should be accompanied by:

- A payroll summary sheet that details which employees you are charging to the Operating line item. While there can be some variation to this form, the summary should include: employee's name, total hours worked, hourly wage, total pay, tax/fringe, total payroll expense, and HUD hours worked and HUD hours paid. If your summary sheet does not include this information, it will need to be approved by the CoC. An example of this summary sheet can be found in Appendix G.

- Proof that the payment has been processed- through General Ledger, payment processing ledger, or other format approved by Community Action, demonstrating actual payment to the employee (not a copy of a check). Charges to CoC grant for salaries and wages (including match expenses) must be based on records that accurately reflect the work performed. For more information, see below.
- Proof of hours worked-format depends on employee type. **Please see chart at the end of Section 4 entitled “Back-Up Documentation-Time Worked for Direct Personnel”.**

Visit the HUD Exchange for further information: [CoC Eligible Activities - Operating Costs - HUD Exchange](#) .

7. Supportive Services – 1050

Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment, are eligible as a supportive service. Supportive services must be necessary to assist program participants in obtaining and maintaining housing.

Eligible Costs

All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking. According to the Interim Rule § 578.53, the following are eligible Supportive Services activities:

- Annual assessment of service need
- Assistance with moving costs
- Case management
- Child care
- Education Services
- Employment assistance and job training
- Food
- Housing Search and counseling Services
- Legal services
- Life skills training
- Mental health services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility deposits
- Direct provision of services

Please refer to Interim Rule for more detailed information on activities considered eligible under the above Supportive Service activities as well as the HUD Exchange's Virtual Binders [CoC Program Components - Supportive Services - HUD Exchange](#).

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.

Back Up Documentation

Depending on the type of Supportive Service activities, there are different expectations for back-up documentation to accompany monthly requests for reimbursement.

All purchases of materials, supplies, goods, and services should be accompanied by:

- A summary sheet, which should show each expense under the Supportive Services line item and tie out with the back-up provided. See Appendix G for an example of the Supportive Services Expense Summary sheet.
- An invoice that clearly demonstrates the expense is approved based on the project budget, was incurred within the sub grant cycle, is eligible based on the Interim Rule, and is allowable based on the 2 CFR Part 200.
- Proof that payment was made (e.g., General Ledger, cancelled check, or Bank Statement)

All costs of labor and direct provision of services should be accompanied by:

- A payroll summary sheet that details which employees are charged to the grant. While there can be some variation to this form, the summary should include: employee's name, total hours worked, hourly wage, total pay, tax/fringe, total payroll expense, and HUD CoC hours worked (for reimbursement and match) and HUD CoC salary and fringe (for reimbursement and match). If your summary sheet does not include this information, it will need to be approved by the CoC. **An example of this summary sheet can be found in Appendix G.**
- Proof that the payment has been processed through General Ledger, payment processing ledger, payroll statement, or another format approved by Community Action, and demonstrating actual payment to the employee (not a copy of a check). Charges to CoC grant for salaries and wages (including match expenses) must be based on records that accurately reflect the work performed. For more information, see below.
- Proof of hours worked, using a format corresponding to employee type. **Please see chart at the end of Section 4 entitled "Back-Up Documentation-Time Worked for Direct Personnel".**

For more information on the use of Supportive Services funding, please refer to § 578.53 of the Interim Rule.

8. Administrative Costs – 1060

The subrecipient may use up to 10% of any grant awarded for the payment of direct project administrative costs related to planning and execution of CoC activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57, because those costs are eligible as part of those activities.

Eligible Costs

Eligible direct administrative costs include:

- General management, oversight, and coordination
- Training on CoC requirements
- Environmental review
- Sharing requirement (Three County CoC must share at least 50% of project administrative funds with subrecipients)

Please note that is not an indirect cost line item. However, the 10% de minimis indirect cost rate or a subrecipients federally approved indirect rate can be applied to eligible direct costs under this line item.

Visit the HUD Exchange for further information: [CoC Eligible Activities - Project Administration - HUD Exchange](#).

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.

Back-Up Documentation

Similar to other direct labor costs billed (see “Back-Up Documentation-Supportive Services” in prior section), subrecipients must:

- Include staff on payroll summary sheet (include employee’s name, total hours work, wage, total pay, tax/fringe, total payroll expense and HUD CoC hours as Admin and HUD/CoC salary and fringe paid as Admin (whether billed for reimbursement or as match)
- Provide proof that payment to employee has been processed (e.g., General ledger, payment processing ledger, payroll statement or other format approved by Community Action)
- Provide proof of hours worked using format dependent on employee type. **Please see chart at the end of Section 4 entitled “Back-Up Documentation-Time Worked for Direct Personnel”.**

9. HMIS – 1051

CoC program funds may be used to pay the costs of contributing data to the HMIS designated by the CoC, including the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone services, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS
- Paying costs of staff to travel and attend HUD-sponsored and HUD-approved training on HMIS
- Paying staff travel costs to conduct intakes

- Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead

If the subrecipient is a “victim service provider”, or a legal services provider, then CoC funds may be used to establish and operate a comparable database that complies with HUD’s HMIS requirements.

For further information visit the HUD Exchange: [CoC Eligible Activities - HMIS - HUD Exchange](#).

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.

Back-Up Documentation

As specified under “Back-Up Documentation-Supportive Services”, all purchases of materials, supplies, goods, and services should be accompanied by:

- An invoice
- Proof that the payment was made ((e.g. General Ledger, cancelled check, or Bank Statement)
- An HMIS summary

Likewise for direct labor costs billed (see “Back-Up Documentation-Supportive Services” in prior section), subrecipients must:

- Include staff on payroll summary sheet (include employee’s name, total hours work, wage, total pay, tax/fringe, total payroll expense and HUD CoC hours as Admin and HUD/CoC salary and fringe paid as Admin (whether billed for reimbursement or as match)
- Provide proof that payment to employee has been processed (e.g., General ledger, payment processing ledger, payroll statement or other format approved by Community Action)
- Provide proof of hours worked using format dependent on employee type. **Please see chart at the end of Section 4 entitled “Back-Up Documentation-Time Worked for Direct Personnel”.**

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](#)

1. Program Match

Matching funds can only be used on eligible CoC Program costs. However, the eligible costs do not necessarily need to be an approved cost/activity within an existing line item in the subrecipient's budget. Subrecipients must be able to document all costs using the same policies and procedures used to document CoC program funding uses. Match, including cash and third-party in-kind contributions, must meet the following criteria:

- Must be verifiable from records (e.g., General Ledger, bank statements, cancelled checks, payroll statements)
- Must not be included as contributions for any other Federal award
- Must be necessary and reasonable for accomplishment of project or program objective
- Must be allowable under 2 CFR Part 200 Subpart E- Cost Principles
- Must not be paid by the Federal Government under another Federal award, except as authorized by Federal statute
- Must be provided for in the approved budget when required by HUD

Community Action requires subrecipients to maintain appropriate recordkeeping of the source and use of match. Records must indicate the grant and fiscal year for which each matched contribution is counted. Records must also show how the value placed on third party in-kind match was derived. Volunteer services must be allocated using the same methods used for regular personnel costs.

2. Cash Match

Sources of cash that may be used as match include:

- Grants from private, local, state, and federal resources (if not statutorily prohibited by source)
- Cash resources
- Revenues from fundraising efforts organized by the recipient or subrecipient
- Recipient or subrecipient staff working on grant eligible activities who aren't paid from the CoC Program grant but are paid from other agency resources
- Program Income from the collection of Tenant Rent (if applicable)

3. In-Kind Match

Allowable in-kind match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources and may include the value of any real property, equipment, goods, or services contributed to the project. The subrecipient must ensure that any funds used to satisfy the in-kind matching requirements are eligible under the laws governing the services in order to be used as match for a grant awarded under the CoC Program.

All in-kind match must meet the following criteria:

- Must be eligible project cost based on Subpart D of the CoC Program Interim Rule
- Must contribute directly to the project and can be documented
- Must be used in the contract year for which it is committed

The following is not allowed as in-kind match:

- Any HUD CoC Program funds
- Cash or any in-kind contribution as matched for another grant
- Cash or in-kind contributions statutorily prohibited as match or ineligible under that program's requirements
- In-kind services provided without an MOU
- Program participant savings
- Federal benefits provided directly to the program participant (e.g.) food stamps
- Similarly, mainstream benefits

In general, program participant mainstream benefits are not considered match in the CoC Program because the benefits are not committed to the recipient/subrecipient for the activities funded through the project. Instead, benefits are provided to the program participant and are based on program participant eligibility for that program.

Any in-kind services provided by a third party must have an established memorandum of understanding (MOU) between the project (see "Match Commitments" section below for details).

4. Match Commitments

Written letters documenting cash or in-kind match commitments must be on file prior to submission of the Project Application in the e-snaps system. Written commitments must be documented on letterhead (of the entity providing the match), signed and dated by an authorized representative, and must, at a minimum, contain the following elements:

- Name of the organization providing the match contribution
- Type of contribution
- Value of the contribution
- Specific services to be provided
- Number of participants the contribution will support
- Value of the contribution per participant
- Name and the grant number of the project and the name of the organization to which the contribution will be given
- Date the contribution will be available (start date of the grant)

The in-kind match that will be provided by a third party must be documented by an MOU between the project and the third party before the contract is executed. The MOU must establish the commitment by the third party to provide the services and must include:

- Name of the project and agency receiving services
- Name of the third-party providing services
- Date resources will be available
- Specific services to be provided
- Profession of persons providing the services
- Hourly cost of the services to be provided

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.

5. Back-Up Documentation

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 Appendix G for a Match Summary sample.

Acceptable sources of cash match documentation generally include financial documentation that verifies the matching fund expenditure. Specific examples include, but are not limited to the following:

- Employee timesheets with supervisory approval that explicitly indicate time spent engaged in eligible, grant-supported activities
- Payroll returns
- Payroll registers
- Personnel file with salary/wage information
- Employee contract
- Cancelled checks/direct deposit schedules
- Invoices and receipts
- General ledger and supporting ledgers
- Financial statements indicating the expenditure and funding source
- Grant agreements (for other local, state, and Federal grant funds)

When documenting in-kind match contributions, subrecipients must provide sufficient documentation of the following:

- **The source:** Demonstrate that the contribution is from an acceptable donor source. This is a requirement of auditing purposes.
- **The donation:** Demonstrate that the good or service being used to fulfill match requirements is eligible as match.
- **The determined value:** Donor should generally determine the value of goods and services and it should be based on a standard objective source (fair market value and not estimates).

Acceptable sources of in-kind match documentation include, but are not limited to the following:

- Signed and dated timesheets completed by an organization's volunteers
- Donation forms completed by an individual or organization with a detailed description with a valuation of an item(s) or service(s)

- Receipts for supplies or services donated by an individual or organization with a detailed description of the item(s) or services(s)

6. 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 Appendix G to view the Three County CoC rent roll form or visit the CoC's 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 July 1, 2022, 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:

Billing Package Contents:

1. A Cover Page
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, 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 allow projects to stop submitting the following for the remainder of the contract:

- **Timesheets-** Projects will not need to submit timesheets with monthly billing packages. This includes both basic timesheets required for staff 100% funded by the CoC and the detailed timesheets required for staff not funded 100% by the CoC. Projects will, however, be required to keep timesheets on hand.
- **Invoices for Re-occurring Monthly Expenses-** Projects will not need to submit invoices or back-up for re-occurring monthly expenses. Expenses are considered re-occurring if the project typically submits a request for reimbursement of this expense on a monthly basis. The expense must be from the same vendor and of similar amount month-to-month to be considered re-occurring. The project must provide backup documentation for the first two months that demonstrate the costs incurred are eligible, reasonable, and expensed properly.
 - Examples of re-occurring expenses include: supportive services phone and internet expenses if invoice previously submitted and costs are similar month-to-month; utility expenses if invoice previously submitted and costs are similar month-to-month.
 - Examples of expenses that are not considered re-occurring and must still have back-up included: phone expenses for new staff, not previously submitted; re-occurring expenses that include a new service or component not included in previously submitted invoice; new expenses that have not been previously billed to the current grant contract.

Projects must continue to submit all other 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.

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 event.

Cover Page

Subrecipients are required to submit a Cover Page with monthly requests for reimbursement. The Cover Page should clearly state project name, preferred mailing address, fiscal contact, total amount requested, and period requested for. See Appendix G for an example of a Cover Page.

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, Personnel Costs, Match & Rent Roll

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 shows 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) as well as Match. These totals should be carried over to their respective Summary Sheets.

Rent Roll 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 Appendix G for sample Rent Roll.

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

Subrecipients should submit exception forms for eligible tax expenses as taxes will be reimbursed with this expectation of exemption for state taxes.

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. The type of timesheet detail varies by Employee type:

Type of Employee	Required Back-Up
<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 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.</p>
<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>	<p>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</p>

	that the activities were eligible. The timesheets should show which hours worked are being expensed to the CoC grant.
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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 \(communityaction.us\)](http://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. Example 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

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers

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

[Three County CoC Client File Checklist](#)



3 County Continuum of Care

CLIENT FILE CHECKLIST

CLIENT NAME:	
Program name:	
Case Manager:	
Date file started:	

Universal Application

CHECKLIST	REQUIRED FOR:	NOTES:
<input type="checkbox"/> Entered in HMIS	All	
<input type="checkbox"/> HUD Intake Form	All CoC TH & PH Programs	
<input type="checkbox"/> Homeless Verification Form	ES, TH Program	
<input type="checkbox"/> Chronic Homeless Qualification	PH programs with CH prioritization	
<input type="checkbox"/> Documentation of Disability	All CoC PSH Programs	
<input type="checkbox"/> Income Verification Form – Intake	All CoC TH and PH Programs requiring rent, lease or occupancy fee	
<input type="checkbox"/> Income Verification Form – Annual	All CoC TH and PH Programs requiring rent, lease or occupancy fee	
<input type="checkbox"/> Coordinated Assessment Tool	All	
<input type="checkbox"/> Release of information including HMIS release	All	
<input type="checkbox"/> HUD Continuum of Care Rent Calculator	All CoC TH and PH Programs requiring rent, lease or occupancy fee	
<input type="checkbox"/> FMR and Rent Reasonableness Calculations		
<input type="checkbox"/> Occupancy Agreement or Lease		
<input type="checkbox"/> Utilities clearly specified		
<input type="checkbox"/> HQS Documentation		
<input type="checkbox"/> Environmental Review Documentation		
<input type="checkbox"/> Action Plan & Case Notes to document ongoing assessment of services		
<input type="checkbox"/> Program Specific Assessments, Contracts or Policies	If Required – Especially note any Educational Requirement of Families	
<input type="checkbox"/> Housing Search Form	TH to document 24 month timeout	

Appendix G: Billing Forms and Examples

[Billing Form Cover Page Example](#)

Attn: Program Director
Three County Continuum of Care
Community Action Pioneer Valley
393 Main Street, Greenfield, MA 01301

RE: **(PERFORMANCE PERIOD)** Expense Reimbursement Request

Sub recipient: **(AGENCY NAME)**

Project: **(NAME OF COC-FUNDED PROJECT)**

Grant No.: **(YOUR GRANT # STARTING WITH MA-)**

Performance Period: **(PERIOD YOU ARE REQUESTING REIMBURSEMENT FOR)**

Total Amount Requested: **(TOTAL EXPENSE REQUEST AMOUNT)**

Dear Program Director,

This letter is to confirm that I have reviewed and approved as accurate the attached Expense Reimbursement Request for the period and project specified above.

Sincerely,

(Signature)

(FISCAL CONTACT NAME)

(TITLE)

Three County CoC Rent Roll

Three County CoC- CERTIFIED RENT ROLL

Project/Program Name: _____

Sub-recipient Name: _____

Address: _____

Reporting Period: _____

Unit Address		Tenant Name & Status Info			Rent Reasonableness & FMR		Tenant Income and Monthly Rent Calculations				Utilities		Actual Tenant Rent Collected						
Unit Address	No. of Bedrooms	Tenant Name (if vacant, write "VAC")	Entry Date	Lease Expiration	Rent Reasonableness (if rental assistance)	FMR (2019)	Monthly Gross Household Income	% Tenant Gross Income	Calculated Tenant Rent Portion	Calculated Subsidy/ Agency Payment	Total Rent Due to Landlord (Tenant Portion + Subsidy)	Utilities tenant/ agency responsible for; N/A if included in the rent	Utility Allowance	Actual Tenant Portion Received (Current Month)	Date Tenant Portion Received	Actual Agency Subsidy (Total Rent Due - Tenant Portion Received)	Client Portion Due YTD	Client Portion Received YTD	Client Balance Due YTD
							-	30%	-	-	-		-	-		-	-	-	-
							-	30%	-	-	-		-	-		-	-	-	-
							-	30%	-	-	-		-	-		-	-	-	-
							-	-	-	-		-	-	-		-	-	-	-
							-	-	-	-		-	-	-		-	-	-	-
							-	-	-	-		-	-	-		-	-	-	-
							-	-	-	-		-	-	-		-	-	-	-
							-	-	-	-		-	-	-		-	-	-	-
											-		-	-					
		<p>I hereby certify that the information contained in the Certified Rent Roll is consistent with and meets the requirements of the HUD Continuum of Care program requirements</p> <p>Name _____</p> <p>Signature _____</p> <p>Title _____</p> <p>Date _____</p>				<p align="center">*Rent Roll can be adjusted if project is requesting reimbursement for full contract rent (with leasing funds only)</p>													

Three County CoC Operating Summary Sheet

Operating Expense Summary			Operating Summary Worksheet Example: Includes Indirect				
Month of:	August 2022						
			<i>List total amount on invoice</i>				
Date	Vendor	Description	Total Expense	Total Billed to Grant	Indirect @ 10%	Total Billed Including Indirect (if allowable)	Total Match Expense
Maintenance							
8/31/2022	Joes Plumbing	For TH Building	\$ 300.00	\$ 300.00	\$ 30.00	\$ 330.00	\$ -
8/167/22	Cleaning Solutions	For TH Building	\$ 250.00	\$ 100.00	\$ 10.00	\$ 110.00	\$ 150.00
					\$ -	\$ -	\$ -
		Total Maintenance	\$ 550.00	\$ 400.00	\$ 40.00	\$ 440.00	\$ 150.00
Utilities							
8/3/2022	Columbia Gas	Gas for TH Building-Month of August	\$ 200.00	\$ 200.00		\$ 200.00	\$ -
	Eversource	Electricity for TH Building-Month of August	\$ 500.00	\$ 300.00		\$ 300.00	\$ 200.00
	Fire District 3	Water for TH Building-Month of August	\$ 300.00	\$ 300.00		\$ 300.00	\$ -
						\$ -	\$ -
		Total Utilities	\$ 1,000.00	\$ 800.00	\$ -	\$ 800.00	\$ 200.00
Insurance							
	Elms Insurance	Annual Property Insurance - \$9,600; billed monthly @ \$800/month	\$ 800.00	\$ 200.00		\$ 200.00	\$ 600.00
		Total Insurance	\$ 800.00	\$ 200.00	\$ -	\$ 200.00	\$ 600.00
Operating-Staffing							
		Total Operating-Staffing (From Payroll Summary)	\$ 3,925.00	\$ 3,500.00	\$ 350.00	\$ 3,850.00	\$ 425.00
		TOTAL OPERATING EXPENSES	\$ 6,275.00	\$ 4,900.00	\$ 390.00	\$ 5,290.00	\$ 1,375.00

Three County CoC Payroll Summary Expense Sheet (biweekly and monthly)

Payroll Summary													Payroll Summary Example-Includes Admin & Indirect				
Month of: August 2022			Pay Periods:		8/1/22-8/14/22		8/15/22-8/28/22										
			<i>For some agencies its easier to track by pay period rather than total for month (but its optional)</i>		hourly pay rate	Total hrs on timesheet	Total CoC Eligible hours	total hrs x payrate	total paid by Agency	Total Salary + Total Fringe	CoC hrs x payrate	percentage based on CoC hrs	Total CoC Salary plus CoC Fringe	Total CoC Expense	Fringe Rate: Use Federally Approved rate or 10%	Total CoC Expense - Total CoC Expense Billed	
Payroll Expense	Employee Name	Pay Period	Pay Rate	Total hours	CoC hours	Total Salary	Tax, Fringe, & Prof. Ins	Total Payroll Expense	Total CoC Salary	Total CoC Fringe	Total CoC Expense	Total CoC Expense Billed	Indirect @ 10%	Total Billed Including Indirect	Total Match Expense		
Supportive Services																	
Supp. Serv.- Case Mgr	Joe Smith	8/1/22-8/14/22	\$20	80	80	\$ 1,600.00	\$ 197.00	\$ 1,797.00	\$ 1,600.00	\$ 197.00	\$ 1,797.00	\$ 1,797.00	\$ 179.70	\$ 1,976.70	\$ -		
Supp. Serv.- Case Mgr	Joe Smith	8/15/22-8/28/22	\$20	80	80	\$ 1,600.00	\$ 197.00	\$ 1,797.00	\$ 1,600.00	\$ 197.00	\$ 1,797.00	\$ 1,797.00	\$ 179.70	\$ 1,976.70	\$ -		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
HMIS																	
HMIS-Staffing	Sam Jones	8/1/22-8/14/22	\$20	40	6.25	\$ 800.00	\$ 75.00	\$ 875.00	\$ 125.00	\$ 11.72	\$ 136.72	\$ 100.00	\$ 10.00	\$ 110.00	\$ 36.72		
HMIS-Staffing	Sam Jones	8/15/22-8/28/22	\$20	40	6.25	\$ 800.00	\$ 75.00	\$ 875.00	\$ 125.00	\$ 11.72	\$ 136.72	\$ 100.00	\$ 10.00	\$ 110.00	\$ 36.72		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
Admin																	
Admin- staffing	Jane Davis	8/1/22-8/14/22	\$20	12.5	12.5	\$ 250.00	\$ 50.00	\$ 300.00	\$ 250.00	\$ 50.00	\$ 300.00	\$ 300.00	\$ 30.00	\$ 330.00	\$ -		
Admin- staffing	Jane Davis	8/15/22-8/28/22	\$20	12.5	12.5	\$ 250.00	\$ 50.00	\$ 300.00	\$ 250.00	\$ 50.00	\$ 300.00	\$ 300.00	\$ 30.00	\$ 330.00	\$ -		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
TOTAL												\$ 4,394.00	\$ 439.40	\$ 4,833.40	\$ 73.44		
Supportive Services Total												\$ 3,594.00	\$ 359.40	\$ 3,953.40	\$ -		
HMIS Total												\$ 200.00	\$ 20.00	\$ 220.00	\$ 73.44		
Admin Total												\$ 600.00	\$ 60.00	\$ 660.00	\$ -		
TOTAL												\$ 4,394.00	\$ 439.40	\$ 4,833.40	\$ 73.44		

Payroll Summary													Payroll Summary Example-Includes Admin & Indirect				
Month of: August 2022			Pay Periods:		8/1/22-8/28/22												
			<i>For some agencies its easier to track by pay period rather than total for month (but its optional)</i>		hourly pay rate	Total hrs on timesheet	Total CoC Eligible hours	total hrs x payrate	total paid by Agency	Total Salary + Total Fringe	CoC hrs x payrate	percentage based on CoC hrs	Total CoC Salary plus CoC Fringe	Total CoC Expense	Fringe Rate: Use Federally Approved rate or 10%	Total CoC Expense - Total CoC Expense Billed	
Payroll Expense	Employee Name	Pay Period	Pay Rate	Total hours	CoC hours	Total Salary	Tax, Fringe, & Prof. Ins	Total Payroll Expense	Total CoC Salary	Total CoC Fringe	Total CoC Expense	Total CoC Expense Billed	Indirect @ 10%	Total Billed Including Indirect	Total Match Expense		
SUPPORTIVE SERVICES																	
Supp. Serv.- Case Mgr	Sarah Morris	8/1/22-8/28/22	\$20	160	80	\$ 3,200.00	\$ 600.00	\$ 3,800.00	\$ 1,600.00	\$ 300.00	\$ 1,900.00	\$ 1,000.00	\$ 100.00	\$ 1,100.00	\$ 900.00		
Supp. Serv.- Case Mgr	Ed Thomas	8/1/22-8/28/22	\$20	160	50	\$ 3,200.00	\$ 600.00	\$ 3,800.00	\$ 1,000.00	\$ 187.50	\$ 1,187.50	\$ 1,061.56	\$ 106.16	\$ 1,167.72	\$ 125.94		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
OPERATING																	
Operating-Staffing	Samantha Ames	8/1/22-8/28/22	\$20	160	100	\$ 3,200.00	\$ 800.00	\$ 4,000.00	\$ 2,000.00	\$ 500.00	\$ 2,500.00	\$ 2,500.00	\$ 250.00	\$ 2,750.00	\$ -		
Operating-Staffing	Fred Jones	8/1/22-8/28/22	\$20	160	60	\$ 3,200.00	\$ 600.00	\$ 3,800.00	\$ 1,200.00	\$ 225.00	\$ 1,425.00	\$ 1,000.00	\$ 100.00	\$ 1,100.00	\$ 425.00		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
HMIS																	
HMIS-Staffing	Sam Jones	8/1/22-8/28/22	\$20	80	10	\$ 1,600.00	\$ 200.00	\$ 1,800.00	\$ 200.00	\$ 25.00	\$ 225.00	\$ 209.38	\$ 20.94	\$ 230.32	\$ 15.62		
HMIS-Staffing	Sharry Smith	8/1/22-8/28/22	\$20	80	20	\$ 1,600.00	\$ 200.00	\$ 1,800.00	\$ 400.00	\$ 50.00	\$ 450.00	\$ 100.00	\$ 10.00	\$ 110.00	\$ 350.00		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
ADMIN																	
Admin- staffing	Jane Davis	8/1/22-8/28/22	\$20	160	5	\$ 3,200.00	\$ 430.00	\$ 3,630.00	\$ 100.00	\$ 13.44	\$ 113.44	\$ 50.00	\$ 5.00	\$ 55.00	\$ 63.438		
Admin- staffing	Doug Williams	8/1/22-8/28/22	\$20	160	12	\$ 3,200.00	\$ 400.00	\$ 3,600.00	\$ 240.00	\$ 30.00	\$ 270.00	\$ 100.00	\$ 10.00	\$ 110.00	\$ 170.000		
			\$0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
TOTAL												\$ 6,020.94	\$ 602.09	\$ 6,623.03	\$ 2,050.00		
Supportive Services Total												\$ 2,061.56	\$ 206.16	\$ 2,267.72	\$ 1,025.94		
Operating total												\$ 3,500.00	\$ 350.00	\$ 3,850.00	\$ 425.00		
HMIS Total												\$ 309.38	\$ 30.94	\$ 340.32	\$ 365.62		
Admin Total												\$ 150.00	\$ 15.00	\$ 165.00	\$ 233.44		
TOTAL												\$ 6,020.94	\$ 602.09	\$ 6,623.03	\$ 2,050.00		

Three County CoC Supportive Services Summary Expense Sheet

Supportive Services Expense Summary				Supportive Services Summary Worksheet Example: Includes Indirect			
Month of:	August 2022						
			<i>List total amount on invoice</i>				
Date	Vendor	Description	Total Expense	Total Billed to Grant	Indirect @ 10%	Total Billed Including Indirect (if allowable)	Total Match Expense
Case Manager Phones							
8/2/2022	Verizon	Sarah Morris -August Invoice	\$ 60.00	\$ 60.00	\$ 6.00	\$ 66.00	\$ -
8/2/2022	Verizon	Ed Thomas-August invoice	\$ 60.00	\$ 60.00	\$ 6.00	\$ 66.00	\$ -
					\$ -	\$ -	\$ -
		Total Case Manager Phones	\$ 120.00	\$ 120.00	\$ 12.00	\$ 132.00	\$ -
Staff Mileage							
8/31/2022	Sarah Morris	August Travel-500 miles @ .50 per mile	\$ 250.00	\$ 250.00	\$ 25.00	\$ 250.00	\$ -
8/31/2022	Ed Thomas	August Travel-300 miles @ .50 per mile	\$ 150.00	\$ 150.00	\$ 15.00	\$ 150.00	\$ -
						\$ -	\$ -
		Total Staff Mileage	\$ 400.00	\$ 400.00	\$ -	\$ 400.00	\$ -
Supplies							
	Staples	office supplies for case managers	\$ 40.00	\$ 40.00	\$ 4.00	\$ 40.00	\$ -
					\$ -		
		Total Supplies	\$ 40.00	\$ 40.00	\$ -	\$ 40.00	\$ -
Moving costs							
	5 college movers	DS move to 25 Talbert	\$ 150.00	\$ 100.00		\$ 100.00	\$ 50.00
		Total Moving Costs	\$ 150.00	\$ 100.00	\$ -	\$ 100.00	\$ 50.00
Supportive Services-Staffing							
		Total Supportive Services-Staffing (From Payroll Summary)	\$ 3,087.50	\$ 2,061.56	\$ 206.16	\$ 2,267.72	\$ 1,025.94
		TOTAL OPERATING EXPENSES	\$ 3,797.50	\$ 2,681.56	\$ 218.16	\$ 2,899.72	\$ 1,075.94

Three County CoC Match Summary Sheet

MATCH SPENDING SUMMARY		Month of:			
Subrecipient:		Contract Start Date:			
Project:		Total Award (Incl CAPV Admin):			
Grant No.:		Min. Match Req (25% less leasing):		<-- Total Award MINUS Leasing, multiplied by 0.25	
Match Source 1: Amt. Committed:		Match Source 2: Amount Committed			
Match Source & Total Used					
Month(s)/Period	Match Source	Match Used in Period	Remaining Match Committ.		
			\$ -		
			\$ -		
			\$ -		
			\$ -		
			\$ -		
			\$ -		
			\$ -		
TOTAL MATCH SPENDING		\$ -			
Minimum Match Required		\$ -	<-- Total Award MINUS Leasing, multiplied by 0.25		
Remaining Match Required		\$ -	<-- Minimum match MINUS Total Match Spending		
Payroll Match					
Date	Staff	Total Salary + Fringe	Eligible Category	CoC Match Expense	Match Source
			Payroll Match Subtotal	\$0.00	
Other Match					
Date	Vender	Total Expense	Eligible Category	CoC Match Expense	Match Source
			Other Match Subtotal	\$ -	
			TOTAL MATCH THIS PERIOD	\$ -	<-- Payroll Match + Other Match

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)