# CoC Program Start-Up Training
# For Fiscal Year 2013 Recipients

# CoC Program Basics

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# Continuum of Care Program

## Start-Up Training
## FY2013 Grants

## *Welcome: Ann Marie Oliva*

**Overall Objective**

Recipients and subrecipients will be able to understand the CoC Program interim rule requirements and responsibilities related to FY 2013 project operation and grant administration

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The purpose of this presentation is to help recipients and subrecipients of CoC Program funds awarded under 24 CFR part 578 (the CoC Program interim rule) gain an understanding of the requirements and responsibilities, related to operations and grant administration.  This applies to projects awarded with FY 2013 funds under the FY 2013/FY 2014 CoC Program Competition and any future competitions awarded under the interim rule.

**2013-2014 Continuum of Care Program NOFA**

- Policy Priorities
  - Strategic resource allocation
  - Ending Chronic Homelessness
  - Ending Family Homelessness
  - Removing Barriers to CoC resources
  - Maximizing the use of mainstream resources
  - Building partnerships
  - Other Priority Populations

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The FY 2013/FY 2014 CoC Competition NOFA described HUD's policy priorities for the CoC Program Competition:
- Strategic resource allocation – Each CoC must comprehensively review all existing projects within its geographic area, using CoC-approved scoring criteria and selection priorities, to determine the extent to which each project is still necessary and addresses the listed policy priorities above. Funds for projects that are determined to be underperforming, obsolete, or ineffective should be reallocated to new projects that are based on proven or promising models.
- Ending Chronic Homelessness
  - o Housing First is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. PSH projects should use a Housing First approach in the design of the program.
  - o CoCs and recipients were encouraged to give the chronically homeless priority for PSH beds as vacancies become available through turnover. PSH projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry.
  - o Reallocation of funds for projects that are determined to be underperforming, obsolete, or ineffective to new projects that are based on proven or promising models was encouraged.
- Removing Barriers to CoC resources by using a Centralized or Coordinated Assessment System and encouraging CoCs and recipients to carefully review the transitional housing models within the geographic area for cost-effectiveness, performance, and for the number and type of criteria used to determine eligibility for the program and determine if rapid re-housing may be a better model for the CoC's geographic area.
- Maximizing the use of mainstream resources
  - o HUD strongly encourages CoCs and recipients to ensure that they are maximizing the use of all mainstream services available.
- Building Partnerships
  - o CoCs should proactively seek to engage in partnerships with Public Housing Agencies (PHAs) within their geographic area.
  - o CoCs should assess the extent to which philanthropy plays a role within the community.
- Other Priority Populations (Veterans and Youth)

**Program Components**

- Permanent Housing (PH)
- Transitional Housing (TH)
- Supportive Services Only (SSO)
- HMIS
- Homelessness Prevention

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Under the CoC Program, funds may be used to support eligible activities under five program components.  These include:
- Permanent Housing (PH)
- Transitional Housing (TH)
- Supportive Services Only (SSO)
- HMIS
- Homelessness Prevention (HP)

Please note that recipients and subrecipients may only use CoC Program funds for homelessness prevention if they are located within a CoC that has been designated a High Performing Community (HPC) by HUD.  Currently, there are no HUD-designated HPCs; therefore, we will not discuss homelessness prevention in this start-up training.

Next, we will discuss each program component in more detail.

**Program Components - PH**

- Permanent Housing
  - Community-based housing without a designated length of stay
  - Includes both Permanent supportive housing (PSH) and Rapid re-housing (RRH)
  - Program participant must be a tenant on a lease/sublease for a term of at least one year
    - The lease/sublease must be renewable for terms that are a minimum of one month long, terminated only for cause

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Permanent housing is community-based housing without a designated length of stay. The CoC Program offers funding for two types of permanent housing: permanent supportive housing and rapid re-housing.

To be considered permanent housing, the program participant must be the tenant on the lease (or sublease) for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminated only for cause. A lease is different from a program agreement that the recipient may have with the participant.

**Program Components - PH:PSH**

- Permanent Housing – Permanent Supportive Housing
  - Long-term housing assistance (24+ months) where supportive services are provided to assist homeless persons with a disability to live independently.
  - Assistance can **only** be provided to individuals with disabilities and families in which one adult **or** child has a disability.
  - FY13 new PH:PSH projects must house people who are chronically homeless

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- Permanent Supportive Housing, referred to as PH-PSH, provides long-term assistance  to individuals and families with a disability.  Long-term assistance means that housing assistance lasts for over 24 months, does not have a designated end date, and is provided until the program participant chooses to exit the project or is terminated from the project.
- Supportive services designed to meet the needs of program participants must be provided.
- New permanent supportive housing projects conditionally awarded in the FY 2013 CoC Program must serve 100 percent chronically homeless for individuals or families.

**Program Components - PH:RRH**

- Permanent Housing – Rapid Re-housing
  - Short-term (1-3 months) or medium-term (4-24 months) housing assistance and supportive services to assist homeless persons obtain and maintain stability in permanent housing.
  - Rental assistance for a household is limited to no more than 24 months.
  - FY13 new PH:RRH projects must house homeless families

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Rapid Re-housing (PH-RRH) provides short- (1 to 3 months) and/or medium-term (4 to 24 months) rental assistance and/or supportive services to program participants in housing that is intended to be permanent–meaning the program participant stays in the unit after the CoC Program assistance ends.  New rapid re-housing conditionally awarded projects may only serve families with children who were either in emergency shelters or on the streets prior to entry and must provide case management.

- Transitional Housing:
  - Facilitates the movement of homeless individuals and families to permanent housing within 24 months.
  - Program participants **must have** a lease, sublease, or occupancy agreement for a term of at least one month, that ends in 24 months and cannot be extended beyond 24 months.

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**Transitional Housing** is designed to facilitate the movement of homeless individuals and families to permanent housing within 24 months. Under the CoC Program, all program participants must have a signed lease, sublease, or occupancy agreement for a term of at least one month and extending no longer than 24 months which can be extended on a case-by-case basis only if permanent housing for the individual has not been located or if the individual or family requires additional time to prepare for independent living. To be clear, **ALL** transitional housing recipients/subrecipients **must have** a signed lease or occupancy agreement with each program participant HUD will allow renewal projects to come into compliance with this requirement through attrition and as new program participants enter the project. HUD defines attrition as the end of a current lease/sublease/occupancy agreement term.

**Program Components - SSO**

- Supportive Services Only:
  – Grant funds can only be used to pay for costs of eligible supportive services provided to unsheltered and sheltered persons for whom the recipient or subrecipient is not providing housing or housing assistance.

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Similar to the Supportive Services Only component under the Supportive Housing Program, the CoC Program's Supportive Services Only component allows recipients and subrecipients to use CoC Program funding to provide services to homeless individuals and families for whom the recipient or subrecipient is not providing housing or housing assistance. SSO includes street outreach.

**Program Components - HMIS**

- HMIS program component
  - This is only for HMIS Leads and allows HMIS Leads to support costs to manage and operate a CoC's HMIS.
  - Recipients funded under all other component types can request an HMIS budget line item for costs of contributing client-level data to the HMIS, but cannot apply for HMIS funding under the HMIS program component.

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The HMIS component is only for CoC-designated HMIS Leads to manage, operate, upgrade, or customize the CoC's HMIS.

Please note that all recipients may request HMIS costs as a budget line item within the component under which they receive funding to cover the costs of contributing data to the HMIS, but the HMIS component for HMIS Leads provides funding to HMIS Leads to operate, manage, and upgrade the CoC's HMIS.

# FY13 CoC Program Grant Information Worksheet

Grant Name/Number: _____

1) Identify the program component for your FY13 CoC Program grant. Check the box in the chart below for the program component type funded with this grant.

2) Is this grant dedicated to serving the chronically homeless or funded under the Samaritan Bonus?  ☐ Yes  ☐ No

3) Enter the grant amount that has been approved for each budget line in the column under the relevant **program component type**.

| | Program Component | | | | | |
| | **PH: PSH** ☐ | **PH: RRH** ☐ | **TH** ☐ | **SSO** ☐ | **HMIS** ☐ | |
| **Eligible BLIs/Activities** | **Approved Costs for FY13 CoC Program Grant** | | | | | **CoC Program interim rule reference for eligible activities** |
| **Acquisition** | $ | | $ | $ | | **Sec. 578.43** |
| **Rehabilitation** | $ | | $ | $ | | **Sec. 578.45** |
| **New construction** | $ | | $ | | | **Sec. 578.47** |
| **Leasing** | $ | | $ | $ | * Funded under HMIS BLI | **Sec. 578.49 (Focus of Day 2 Topic 2)** |
| **Rental assistance** | $ | $ | $ | | | **Sec. 578.51 (Focus of Day 2 Topic 3)** |
| **Supportive services** | $ | $ | $ | $ | | **Sec. 578.53** |
| **Operating costs** | $ | | $ | | * Funded under HMIS BLI | **Sec. 578.55** |
| **HMIS** | $ | $ | $ | $ | $ | **Sec. 578.57** |
| **Administration** | $ | $ | $ | $ | $ | **Sec. 578.59** |
| **Grant TOTAL** | $ | $ | $ | $ | $ | -- |
| **Grant TOTAL less Leasing** | $ | $ | $ | $ | $ | -- |
| **25% of Grant TOTAL less Leasing =Required Match TOTAL** | $ | $ | $ | $ | $ | **Sec. 578.73** |
| **CoC Program interim rule reference for component types** | **578.37(a)(1)(i)** | **578.37(a)(1)(ii)** | **578.37(a)(2)** | **578.37(a)(3)** | **578.37(a)(4)** | -- |

# Video 3: Eligible Costs

## *Lisa Coffman*
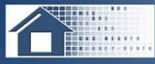
## Eligible Costs

- Acquisition/Rehabilitation/New Construction
- Leasing
- Rental assistance
- Supportive services
- Operating
- HMIS
- Project administration

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CoC Program funds can be used to support eligible costs including: acquisition/ rehabilitation/new construction, leasing, rental assistance, supportive services, operating costs, HMIS, and project administration. Although there are other eligible costs, such as planning and UFA, this training focuses only on the costs listed here.

## Eligible Costs

| Eligible Costs | Program Components | | | | |
|---|---|---|---|---|---|
| | Permanent Housing | | TH | SSO | HMIS |
| | PH: PSH | PH: RRH | | | |
| Acquisition | ✔ | | ✔ | ✔ | |
| Rehabilitation | ✔ | | ✔ | ✔ | |
| New construction | ✔ | | ✔ | | |
| Leasing | ✔ | | ✔ | ✔ | |
| Rental assistance | ✔ | ✔ | ✔ | | |
| Supportive services | ✔ | ✔ | ✔ | ✔ | |
| Operating costs | ✔ | | ✔ | | |
| HMIS | ✔ | ✔ | ✔ | ✔ | ✔ |
| Project Administration | ✔ | ✔ | ✔ | ✔ | ✔ |

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Not all eligible costs are eligible under every program component. This chart shows the costs that are eligible under each CoC Program component. Operating costs are not eligible under the SSO component because the costs of the day-to-day operation of an SSO facility are eligible supportive service costs for an SSO grant. Additionally, operating and leasing costs are not checked under the HMIS component because the costs of operating and leasing a structure in which an HMIS is operated are eligible as an HMIS cost in a HMIS grant awarded to an HMIS Lead.

## Eligible vs. Approved Costs

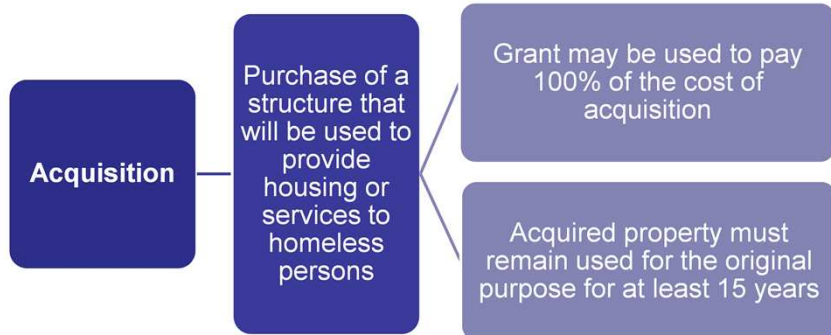| Eligible | Approved |
|---|---|
| All costs included in the CoC Program interim rule | • Each project has approved budget line items |
| | • Recipients may only spend CoC Program funds on approved costs |
| | • HUD approval is required to amend the budget to spend money on CoC Program eligible costs other than those that were included in the project budget approved through the application process |

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It is important for recipients and subrecipients to understand the difference between approved and eligible costs under the CoC Program.  Eligible costs are all those costs that are included in the CoC Program interim rule, as shown on the previous slide.

Approved costs are the budget line items specifically approved by HUD in the recipient's grant agreement. As part of the annual CoC Program Competition, each applicant submits an application to HUD with a project budget.  This budget requests CoC Program funds to pay for specific costs (such as leasing, HMIS, etc.).  HUD reviews the project application and budget, and if approved as submitted, incorporates into the recipient's grant agreement with HUD.   Recipients must request and receive prior HUD approval to amend their project budget.

**Eligible Costs − Acquisition**

| | |
|---|---|
| **Acquisition** | Purchase of a structure that will be used to provide housing or services to homeless persons |

Grant may be used to pay 100% of the cost of acquisition

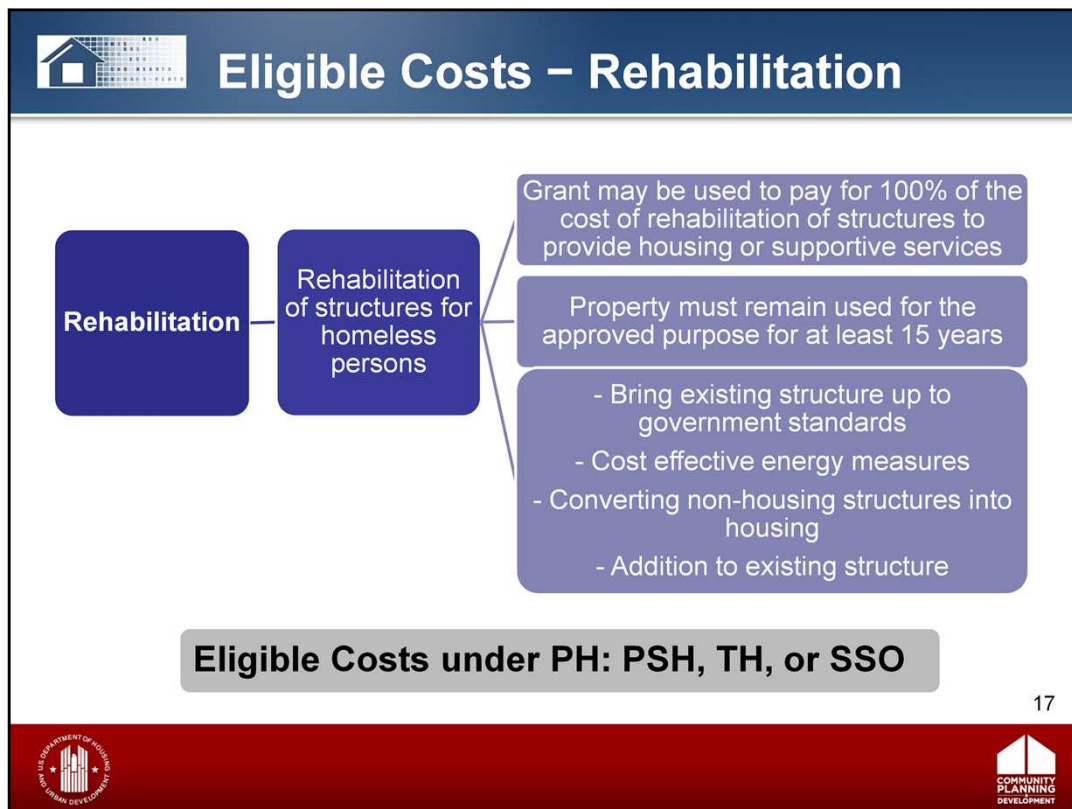Acquired property must remain used for the original purpose for at least 15 years

**Eligible Cost under PH: PSH, TH, or SSO**

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Acquisition is an eligible cost and is defined as "purchasing a structure that will be used to provide housing or services to homeless persons." Acquisition is an eligible cost of Permanent Housing - Permanent Supportive Housing (PH:PSH), Transitional Housing (TH), and Supportive Services Only (SSO) program components. Funds may be used to pay up to 100 percent of the cost; however, the acquired property must remain in use for homeless activities for 15 years. For example, if an organization buys a building to create permanent supportive housing, the acquisition cost of this building would be an eligible cost, as long as it is providing housing for people who meet the HUD eligibility requirements for HUD-funded permanent supportive housing and the property remains for this use for 15 years.

## Eligible Costs − Rehabilitation

Rehabilitation → Rehabilitation of structures for homeless persons →

- Grant may be used to pay for 100% of the cost of rehabilitation of structures to provide housing or supportive services
- Property must remain used for the approved purpose for at least 15 years
- Bring existing structure up to government standards
- Cost effective energy measures
- Converting non-housing structures into housing
- Addition to existing structure

**Eligible Costs under PH: PSH, TH, or SSO**

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Under the PH: PSH, Transitional Housing, and SSO program components, recipients and subrecipients may use CoC Program funds to renovate an existing structure. Recipients may use rehabilitation funds to pay up to 100 percent of the cost of the rehabilitation of existing structures used to provide housing or supportive services and the structure must remain in use for homeless activities for 15 years. Recipients may incur rehabilitation costs including:

- Bringing an existing structure up to state and local government health and safety standards
- Installing cost-effective energy measures
- Converting non-housing structures into housing
- An addition to an existing structure that increases the floor area by less than 100 percent

Recipients are prohibited from using CoC Program funds for rehabilitation of a leased property.

Eligible Costs – New Construction
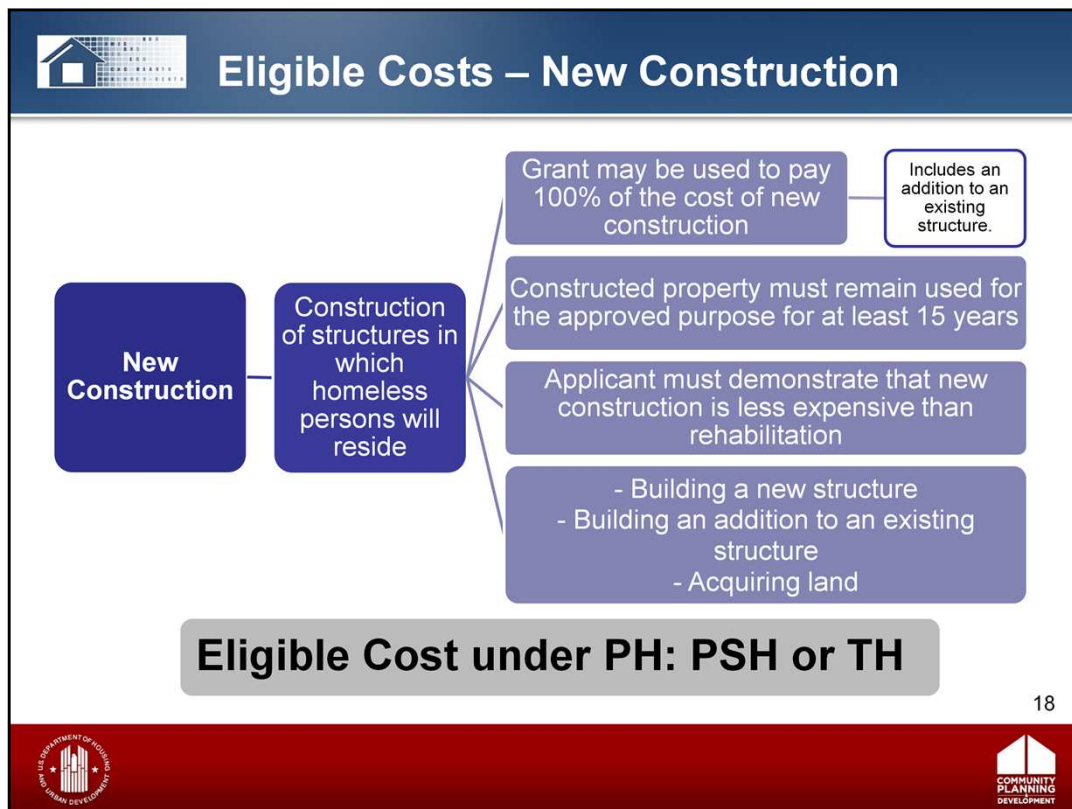
Recipients and subrecipients may use CoC Program funds to build a new structure to be used as housing. Housing built with CoC Program funds must remain in use for homeless activities for 15 years.  Specifically, under the PH:PSH and TH program components, recipients and subrecipients may use new construction funds to pay the costs of:
- Building a new structure
- Building an addition to an existing structure that increases the floor area by 100 percent or more, and
- Acquiring land associated with construction.

The applicant must demonstrate that new construction is cheaper than rehabilitation or that there is a lack of appropriate units that could be rehabilitated at a cost less than construction. Similar to rehabilitation costs, CoC Program funds cannot be used for new construction on a property that is leased.

**Eligible Costs − Leasing**

Leasing — Funds to pay rent on structures or individual units to provide supportive housing or supportive services

- Grant may be used to pay 100% of the costs of leasing an individual unit or structure(s)
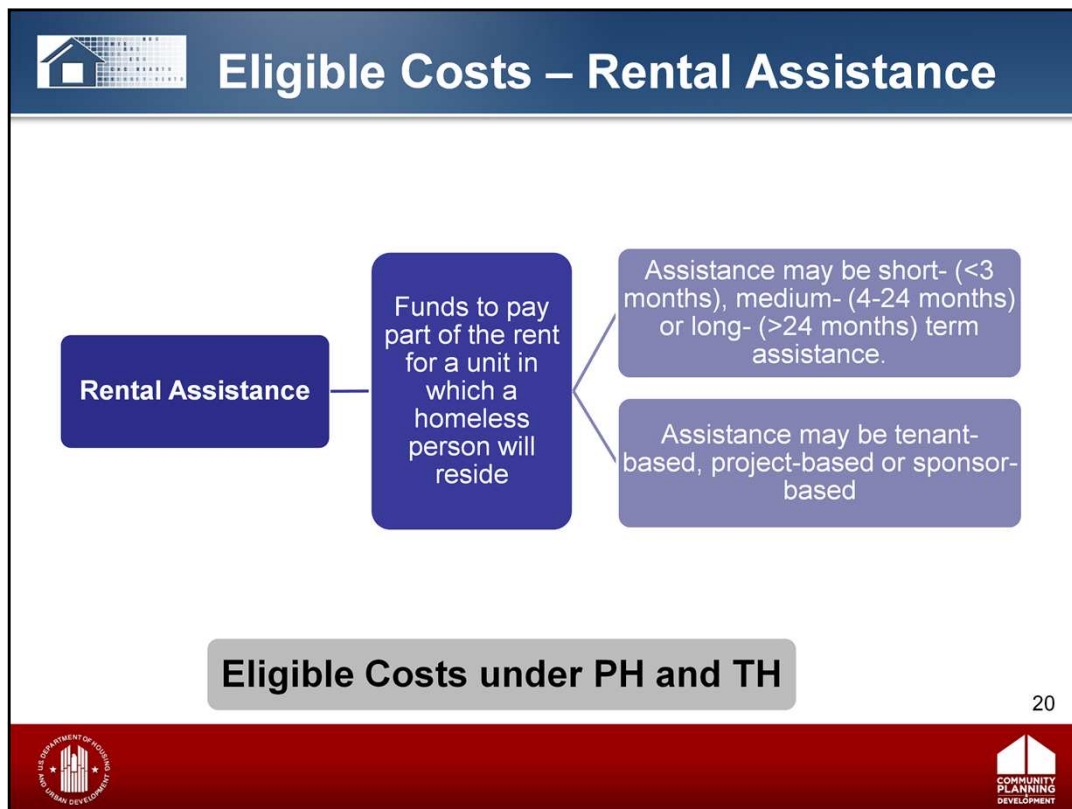- Grant may not be used to lease units or structures owned by the recipient, subrecipient, or any related organization

**Eligible Costs under PH: PSH, TH, and SSO**

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Recipients and subrecipients may choose to use CoC Program funds to lease a structure or a portion of a structure that will be used for permanent supportive housing, transitional housing or to provide supportive services. Leasing funds may also be used to lease individual housing units for transitional or permanent supportive housing.  Note that CoC Program funds may **NOT** be used to lease units or structures owned by the recipient, subrecipient, or any related organization or organization(s) unless HUD authorizes an exception for good cause.

Eligible Costs – Rental Assistance

Rental Assistance → Funds to pay part of the rent for a unit in which a homeless person will reside → Assistance may be short- (<3 months), medium- (4-24 months) or long- (>24 months) term assistance.

Assistance may be tenant-based, project-based or sponsor-based

Eligible Costs under PH and TH

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Recipients and subrecipients may use funds to provide rental assistance under the PH (PSH and RRH), TH, and Homelessness Prevention program components.  As stated previously, Homelessness Prevention was not an eligible program component in FY 2013 as no CoCs were designated as a High Performing Community.  Through rental assistance, recipients and subrecipients make housing affordable for program participants by using CoC Program grant funds to pay the difference of the actual rent for a unit and a percentage of the program participant's income.

Rental Assistance may be:
- Short-term (up to 3 months)
- Medium-term (4-24 months)
- Long-term (more than 24 months)

Rental assistance can be tenant-based, project-based or sponsor-based.
The types, lengths, and requirements of rental assistance differ depending on the program component under which the rental assistance is being provided.   These differences will be discussed later.

Eligible Costs – Supportive Services

Supportive Services — Address the needs of the program participants to help program participants obtain and maintain housing.

Grant may fund eligible costs of services that address the special needs of program participants

Services provided must assist program participants obtain and maintain housing

Eligible Costs under PH, TH, SSO

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Recipients and subrecipients may use CoC Program funds to pay for a wide range of supportive services that address the special needs of program participants. These supportive services may be provided as part of SSO projects, or as an eligible activity of a permanent and transitional housing projects.  Regardless of the program component, all CoC Program-funded supportive services must be necessary to assist program participants to obtain and maintain housing.

If supportive services are being provided directly by the recipient or subrecipient, eligible costs include the costs of labor (salary and benefits) or supplies and materials directly for providing supportive services to program participants.

## Eligible Costs – Supportive Services

**Supportive Services** - In general, grant funds may be used on those services listed in the CoC Program interim rule *only*

- Assessing service needs
- Moving costs
- Case management
- Child care
- Education services
- Employment assistance & job training
- **Food** (no longer an eligible operating cost)
- Housing search & counseling services

- Legal services
- Life skills training
- Mental health services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility Deposits

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There are 16 different eligible supportive service costs under the CoC Program. Recipients and subrecipients may not use CoC Program funds for any costs not specifically described as an eligible cost of providing supportive services in the interim rule. The services you can provide with CoC Program funds are further limited by those listed in your approved budget.

In addition, the over-arching eligible costs reflected on the slide are only guidelines. The interim rule identifies more specific service activities that are eligible under each supportive service category. Again, all CoC Program-funded supportive services must be necessary to assist program participants to obtain and maintain housing.

**Eligible Costs − Operating**

Operating — Costs associated with the day-to-day physical operation of housing in which homeless persons are housed

Grant may fund:
Maintenance and repair of housing
Building security
Electricity, gas & water
Furniture
Equipment

Grant may also fund staff and overhead costs related to carry out these activities

Grant may NOT fund:
- Rental assistance and Operating in the same unit/ structure
- Emergency shelter or supportive services-only facilities
- Maintenance and repair costs that are included in the lease

**Eligible Costs under PH: PSH or TH**

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Recipients and subrecipients may use CoC Program operating funds to pay the costs of the day-to-day operations of transitional and permanent housing in either a single building or structure or in individual housing units.

CoC Program operating costs include those related to:
- The maintenance and repair of the housing including scheduled payments to a reserve fund for the future replacement of major buildings systems
- Security for a housing program where more than 50 percent of the units or building area is paid for with grant funds.
- Utilities including electricity, gas, heating oil or other heating/cooling costs, and water
- Furniture
- Equipment
- Staff time and related overhead costs to carrying out these operating activities are eligible operating costs.

Operating Funds may not be used for:
- Operating costs of emergency shelters and supportive service only facilities.
- The maintenance and repair of housing where those costs are included in the lease.
- A structure or unit that is also subsidized with rental assistance funds.
- Food is now eligible under supportive services only.

Additionally, many Operating Budgets included furniture. While this is an allowable cost it is important to note that the furniture is intended for the operation of the housing; therefore, the furniture in projects must be retained for use in the project and cannot be kept by the program participant upon exiting the project.
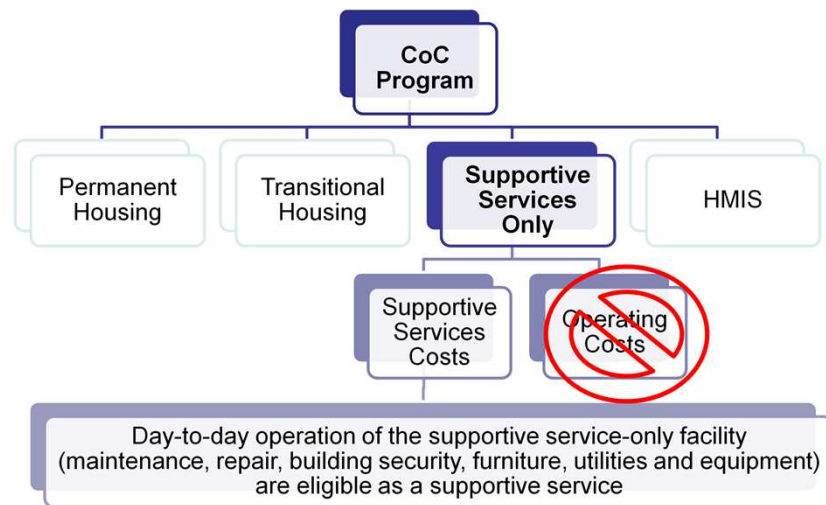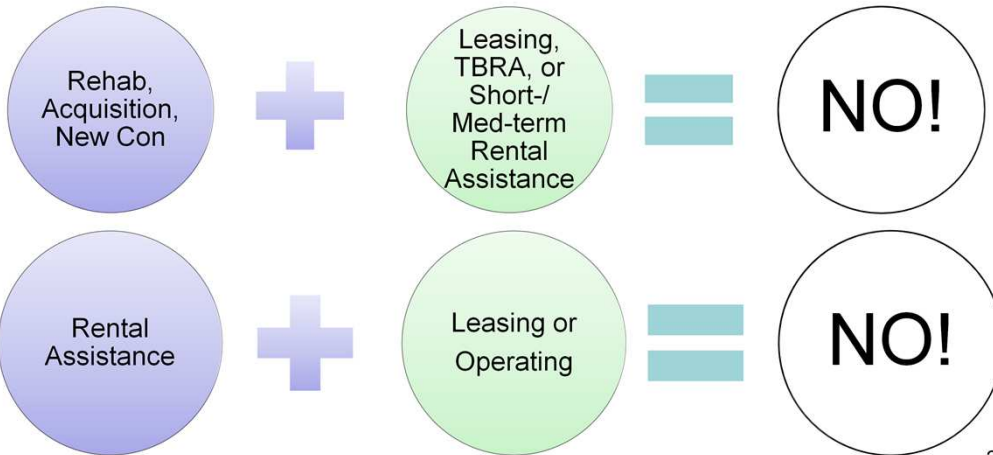
As discussed previously, operating costs can only be used in PH: PSH or TH program components. The non-supportive service costs of running an SSO project, such as utilities, maintenance, etc. are eligible supportive services costs under the SSO component. However, these costs are only eligible SSO costs if the services are provided in a building that is not also being used for housing

**Restrictions on Combining Funds**

The following types of assistance may not be combined in a **single structure/housing unit**:

Rehab, Acquisition, New Con **+** Leasing, TBRA, or Short-/Med-term Rental Assistance **=** NO!

Rental Assistance **+** Leasing or Operating **=** NO!

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There are limits on how different eligible costs may be combined.  For example, a single unit is prohibited from receiving both rental assistance and operating funds because this would be considered "double-dipping" by essentially subsidizing the unit twice.

In a **single structure or housing unit**, recipients and subrecipients are prohibited from:

- Combining Acquisition, Rehab or New Construction costs with:
  o Leasing,
  o Tenant-based rental assistance, or
  o Other short- or medium-term rental assistance

- Combining Rental Assistance costs with:
  o Operating, or
  o Leasing.  Note that it is acceptable to use leasing funds in one structure and rental assistance in another structure within the same project

## Eligible HMIS Costs for All Program Components

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

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Recipients and subrecipients may use CoC Program funds to pay the costs of contributing data to the HMIS designated by the CoC.  Eligible HMIS data collection costs are:
- Purchasing or leasing computer hardware, software and/or software licenses
- Leasing office space, equipment, furniture, and utilities for HMIS activities
- Salaries, operating costs, and duties as required to operate an HMIS
- Trainings related to the use of HMIS
- Reporting to CoC on HMIS

**Eligible Costs – Project Administration**

- Project administration funds can be used to conduct:
  - General management, oversight and coordination
  - Training on CoC requirements
  - Environmental review
- Recipients are required to share at least 50% of project administrative funds with subrecipients
- Costs of carrying out other eligible activities should be charged to those budget line items, NOT project administration

**Eligible Activity under ALL components**

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Project administration funds in the CoC Program may be used to pay for costs under three main categories:

- General management, oversight and coordination. This includes salaries and related costs for staff engaged in administration including activities such as preparing budgets, monitoring compliance and evaluating program results
- The costs of providing training on CoC requirements and attending HUD-sponsored trainings; and
- Environmental review

Recipients are required to share at least 50% of project administrative funds with subrecipients.

Under each eligible cost, HUD has stated that the costs of staff and direct overhead for carrying out eligible activities for each of the eligible activities under the CoC Program are to be charged to the eligible budget line item for that activity (e.g., maintenance worker should be charged to the operating budget line item, and costs of administering rental assistance should be charged to the rental assistance budget line item). Therefore, these costs (staff and overhead) should not be charged to the project administration budget line item. Only those staff and overhead costs related to carrying out project administration should be charged to the project administration budget line item.

Note that projects that moved funds from another budget line item to increase their administrative costs, per the option allowed under the FY13 NOFA, should be aware that this was a permanent adjustment and recipients are prohibited from ever moving the funds back to another Budget Line Item

## Limitation on Use of Funds

- No assistance may be used to replace state or local funds previously used/designated to assist homeless persons.
- The federal, state, or local government receiving funds cannot discriminate against an organization on the basis of religious affiliation.
- Recipients and subrecipients may **NOT** charge program participants program fees

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There are some limitations on the use of grant funds:
- No assistance may be used to replace state or local funds previously used in the project to assist homeless persons.
- When receiving federal funds, the recipient cannot discriminate against an organization, individual, or family because of religious affiliation.
- Program fees are not allowed to be collected from program participants.

| CoC Program Description of Supportive Services Eligible Costs (24 CFR 578.53) | |
|---|---|
| **Eligible Cost** | **Description** |
| **Annual Assessment of Service Needs** | The costs of conducting an annual assessment of the service needs of the program participants and making adjustments as required by § 578.53(a)(2) |
| **Assistance with Moving Costs** | Reasonable one-time moving costs, including truck rental and hiring a moving company |
| **Case Management** | Costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s). Component services and costs include:<br>• Counseling<br>• Developing, securing, and coordinating services<br>• Using the centralized or coordinated assessment system as required under 24 CFR part 578.23(c)(9)<br>• Obtaining Federal, State, and local benefits<br>• Monitoring and evaluating program participant progress<br>• Providing information and referrals to other providers<br>• Providing ongoing risk assessment and safety planning for victims of domestic violence, dating violence, sexual assault, and stalking<br>• Developing an individualized housing and service plan, including a path to permanent housing stability<br>• Conducting the required annual assessment of program participants' service needs (24 CFR part 578.53(a)(2)) |
| **Child Care** | Costs of establishing and operating child care; providing child care vouchers and meals and snacks for children from families experiencing homelessness; and delivering comprehensive and coordinated developmental activities, provided that:<br>• Children are under age 13, unless they have a disability<br>• Disabled children are under age 18<br>• The child care center is licensed by the jurisdiction in which it operates in order for its costs to be eligible |
| **Education Services** | Costs of improving knowledge and basic educational skills, including:<br>• Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED)<br>• Component services, including screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources |

| CoC Program Description of Supportive Services Eligible Costs (24 CFR 578.53) | |
|---|---|
| **Eligible Cost** | **Description** |
| **Employment Assistance and Job Training** | Costs of establishing and operating employment assistance and job training programs, including:<br><br>• Classroom, online, and/or computer instruction<br><br>• On-the-job instruction<br><br>• Services that assist individuals in securing employment, including:<br><br>   ➢ Employment screening, assessment, or testing<br><br>   ➢ Structured job skills and job-seeking skills<br><br>   ➢ Special training and tutoring, including literacy training and pre-vocational training<br><br>   ➢ Books and instructional material<br><br>   ➢ Counseling or job coaching<br><br>   ➢ Referral to community resources<br><br>• Services that assist individuals in acquiring learning skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates<br><br>• Services that assist individuals in increasing their earning potential<br><br>• The cost of providing reasonable stipends to program participants in employment assistance and job training programs |
| **Food** | Cost of providing meals or groceries to program participants. Pursuant to the provisions of 24 CFR part 578.75(e), recipients and subrecipients who use CoC program funds to provide supportive housing for homeless persons with disabilities must provide residents with meals or meal preparation facilities. |
| **Housing Search and Counseling** | Costs of helping eligible program participants locate, obtain, and retain suitable housing. Component services or costs include:<br><br>• Tenant counseling; helping individuals and families understand leases; securing utilities; and making moving arrangements<br><br>• Mediation with property owners and landlords on behalf of eligible program participants<br><br>• Credit counseling, accessing a free personal credit report, and resolving personal credit issues<br><br>• Payment of rental application fees |

| CoC Program Description of Supportive Services Eligible Costs (24 CFR 578.53) | |
|---|---|
| **Eligible Cost** | **Description** |
| **Legal Services** | Costs include fees charged by licensed attorneys and by persons under the supervision of licensed attorneys for advice and representation in matters that interfere with a homeless individual's or family's ability to obtain and retain housing with respect to:<br><br>• Eligible subject matters such as child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants<br><br>• Component services or costs such as receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling<br><br>• Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs of performing the services.<br><br>The following legal services are **ineligible** as supportive services:<br><br>• Legal services for immigration and citizenship matters and issues related to mortgages and homeownership<br><br>• Retainer fee arrangements and contingency fee arrangements |
| **Life Skills Training** | Costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to assist the program participant in functioning independently in the community. Such life management skills include the budgeting of resources and money management; household management; conflict management; shopping for food and needed items; nutrition; the use of public transportation; and parent training. |
| **Mental Health Services** | Costs of direct outpatient treatment of mental health conditions provided by licensed professionals. Eligible services may include crisis intervention; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems. |

| CoC Program Description of Supportive Services Eligible Costs (24 CFR 578.53) | |
|---|---|
| **Eligible Cost** | **Description** |
| **Outpatient Health Services** | Costs of direct outpatient treatment of medical conditions when provided by licensed medical professionals, such as:<br>• Providing an analysis or assessment of an individual's health problems and development of a treatment plan<br>• Helping individuals understand their health needs<br>• Providing medical treatment or helping individuals obtain and comply with appropriate medical treatment<br>• Providing preventive medical care and health maintenance services, including in-home health services and emergency medical services<br>• Providing appropriate medication<br>• Providing follow-up services<br>• Providing preventive and non-cosmetic dental care |
| **Outreach Services** | Costs of outreach activities, including transportation and cell phone costs for outreach workers, for the purpose of providing immediate support and intervention and identifying potential program participants. Eligible services include the following:<br>• Initial assessment<br>• Crisis counseling<br>• Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries<br>• Actively linking and providing people with information and referrals to homelessness and mainstream programs<br>• Publicizing the availability of the housing and/or services provided within the Continuum of Care |
| **Substance Abuse Treatment Services** | Costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing. The costs of inpatient detoxification and other inpatient drug or alcohol treatment are **ineligible** under CoC program supportive services. |

| CoC Program Description of Supportive Services Eligible Costs (24 CFR 578.53) | |
|---|---|
| **Eligible Cost** | **Description** |
| **Transportation** | Costs include the following:<br><br>• Program participants' travel on public transportation or in vehicles provided by the recipient or subrecipient to/from medical care, employment, child care, or other eligible services<br><br>• Mileage allowance for service workers to visit program participants and carry out housing quality inspections<br><br>• The costs associated with the purchase or lease of a vehicle (gas, insurance, taxes, maintenance0 in which staff transports program participants and/or staff serving program participants<br><br>• The cost of a recipient's or subrecipient's staff assigned to accompany or assist program participants in using public transportation. If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:<br><br>   ➢ Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types).<br><br>   ➢ Payments for car repairs or maintenance must be made by the recipient or subrecipient directly to the third party that repairs or maintains the car.<br><br>   ➢ Recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance. |
| **Utility Deposits** | Costs associated with utility deposits, which must be a one-time fee, paid to utility companies. (Certain other move-in costs, including security deposits and first and last months' rent, are eligible costs under leasing and rental assistance.) |

# CoC Program Eligible Project Administrative Costs
# (24 CFR 578.59)

CoC Program recipients/subrecipients may use up to 10 percent of any CoC Program grant for the payment of project administrative costs related to the planning and execution of Continuum of Care activities.

This does not apply to Continuum of Care Planning Activities and UFA costs.

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Staff and overhead costs related to carrying out CoC Program eligible activities (documented in parts 578.39 through 578.57) are not considered project administrative costs since they are eligible as part of those activities.

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# Eligible Project Administrative Costs

## (1) General management, oversight, and coordination

Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

- Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

  - Preparing program budgets and schedules, and amendments to those budgets and schedules;
  - Developing systems for assuring compliance with program requirements;
  - Developing agreements with subrecipients and contractors to carry out program activities;
  - Monitoring program activities for progress and compliance with program requirements;
  - Preparing reports and other documents directly related to the program for submission to HUD;
  - Coordinating the resolution of audit and monitoring findings;
  - Evaluating program results against stated objectives; and
  - Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described above.

- Travel costs incurred for monitoring of subrecipients;

- Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

- Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

## (2) Training on Continuum of Care requirements
Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

## (3) Environmental review
Costs of carrying out the environmental review responsibilities under § 578.31.

Video 4: Eligible Participants – Homeless Status

*Lisa Coffman*

**Applicability of the Final Rule**

- Final Rule on Definition of Homeless (effective Jan 4, 2012) applies to:
  - Projects funded under ESG Program
  - New and Renewal FY 2011 SHP and Shelter Plus Care projects (but not Section 8 Moderate Rehab SRO Program)
  - All CoC Program-funded projects
- Definition from Final Rule is incorporated into the CoC Program rule
- Definition is important, but not the only eligibility requirement that will need to be documented

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The Homeless Definition Final Rule was published in the Federal Register on December 5, 2011 and became effective January 4, 2012 for the SHP Program the S+C Program and the Emergency Solutions Grants Program. It applies to new and renewal projects starting with the FY 2011 CoC Homeless Assistance Grants competition.

Additionally, the definition of homeless from the Homeless Definition Final Rule was incorporated into to the CoC Program interim rule, which became effective August 30, 2012 and applies to all new projects funded or renewed through the CoC Program (FY12 and F13).

In addition to homeless eligibility, projects may also have additional eligibility criteria related to disability or chronic homeless status. Recipients should refer to their grant agreement to see if any additional eligibility criteria apply.

**Overview of Homeless Definition**

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless Under other Federal Statutes
- Category 4: Fleeing/Attempting to Flee Domestic Violence

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There are four categories of homelessness included in the definition that we will discuss over the next several slides.

Category 1 is defined as an individual or family who lacks a fixed, regular, and adequate nighttime residence.

Three circumstances are considered literally homeless, including:
- Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, including: car, park, abandoned building, bus or train station, airport, and camping ground (place not meant for human habitation).
- Living in a shelter designated to provide a temporary living arrangement, including: congregate shelter, transitional housing, hotel and motels paid for by charitable organizations or federal/state/local government programs.
- Exiting an institution (e.g., jail, hospital) where the participant resided for 90 days or less, **AND** were residing in an emergency shelter or place not meant for human habitation immediately before entering the institution.
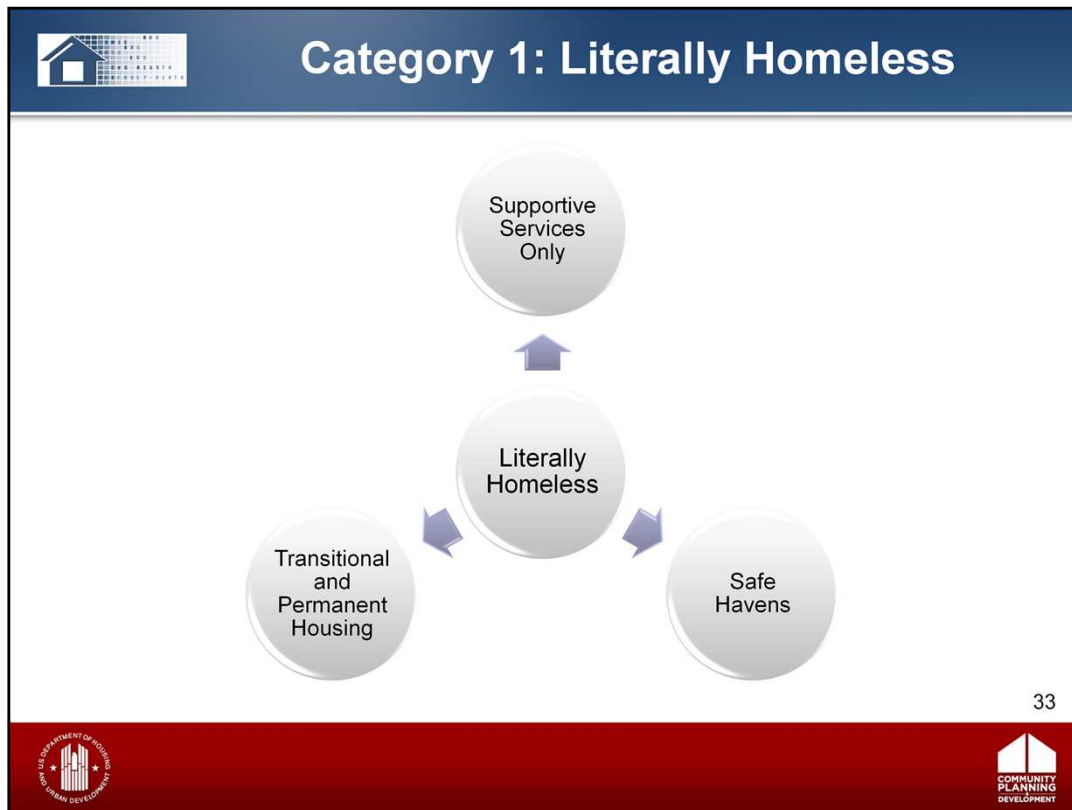
Individuals or families who meet the definition of Literally Homeless may be served by the following types of projects that were awarded in the FY 2013 CoC Program Competition:
- Supportive Services Only,
- Safe Havens (individuals must originally have come from streets or emergency shelter and have a severe mental illness and have been unwilling to partici-pate in housing/services),
- Transitional Housing and Permanent Housing (both PSH and RRH). However, persons coming from transitional housing are only eligible for PSH if they originally came from the streets, safe havens, or emergency shelter (but not Transitional Housing).

## Category 2: Imminent Risk

- Individuals/families who will imminently lose their primary nighttime residence within 14 days
  **AND**
- Have no subsequent residence identified
  **AND**
- Lack the resources or support networks needed to obtain other permanent housing

\* Primary nighttime residences include housing the individual/family owns, rents, or shares with others and rooms in hotels/motels that are paid for by the individual/family seeking assistance

\*Persons who will be exiting institutions in the next 14 days are not defined as homeless under Category 2.

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Individuals or families who will imminently lose their primary nighttime residence within 14 days, **AND** have no subsequent residence identified, AND lack the resources or support network necessary to obtain other permanent housing. Primary nighttime residences include:

- Housing the individual/family owns, rents, or shares with others without paying rent; and
- Rooms in hotels/motels that are paid for by the individual/family seeking assistance

Persons who will be exiting institutions in the next 14 days are not defined as homeless under Category 2, even if they have not identified a housing placement prior to exit.
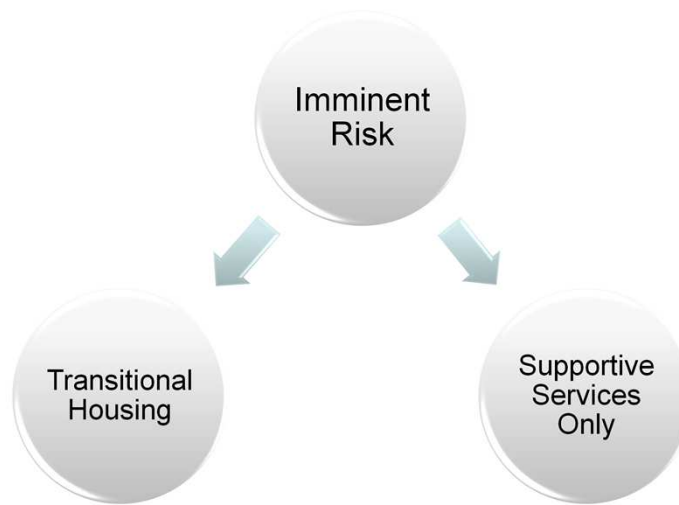
Individuals or families who meet the definition of Imminent Risk of Homelessness may only be served by the following types of projects that were awarded in the FY 2013 CoC Program Competition:  Transitional Housing, and Supportive Services Only. Recipients are prohibited from serving such persons under Permanent Housing (PSH and RRH).

**Category 3: Homeless Under Other Federal Programs***

- Unaccompanied youth under 25 or families with children and youth who do not otherwise qualify as homeless, but who:
  - Meet homeless definition under another federal statute
  **AND**
  - Have not had lease, ownership interest, or occupancy agreement in permanent housing any time during last 60 days
  **AND**
  - Have experienced two or more moves during last 60 days

*Requires HUD approval

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To serve Category 3 homeless, a CoC was required to request and receive HUD approval in the FY 2013 CoC Application.  No CoCs were approved to serve Category 3 homeless in the FY 2013–FY 2014 CoC Program Competition.  Therefore, HUD conditioned any project that indicated it would serve this population. TH and SSO projects must assure the field office that they will only serve homeless as defined as homeless under Categories 1, 2, and 4, and PH (PSH or RRH) projects may only serve Categories 1 and 4.

A description of Category 3 is provided only for background purposes.

Unaccompanied youth under 25 or families with children and youth who do not otherwise qualify as homeless, but who:

Meet homeless definition under another federal statue (a list of federal statutes are included in the CoC Program interim rule), **AND**, have not had a lease, ownership interest, or occupancy agreement in permanent housing any time during the last 60 days, **AND**, have experienced two or more moves during the last 60 days, **AND**...

Can be expected to continue in such status for an extended period of time because of:
- Chronic disabilities, or
- Chronic physical health or mental health conditions, or
- Histories of domestic violence or childhood abuse (including neglect), or
- Presence of a child or youth with a disability, or
- Two or more barriers to employment.

**Category 4: Fleeing/Attempting to Flee DV**

- Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, who
  - have no identified subsequent residence
  
  **AND**
  
  - lack the resources and support networks needed to obtain other permanent housing

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Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, who:
- Have no identified subsequent residence, **AND**
- Lack the resources and support networks necessary to obtain other permanent housing.

Individuals or families who meet the definition of Fleeing/Attempting to Flee may be served by the following types of projects funded in the FY 2013 CoC Program Competition:  Transitional Housing, Permanent Housing:  Permanent Supportive Housing, Permanent Housing: RRH, and Supportive Services Only.
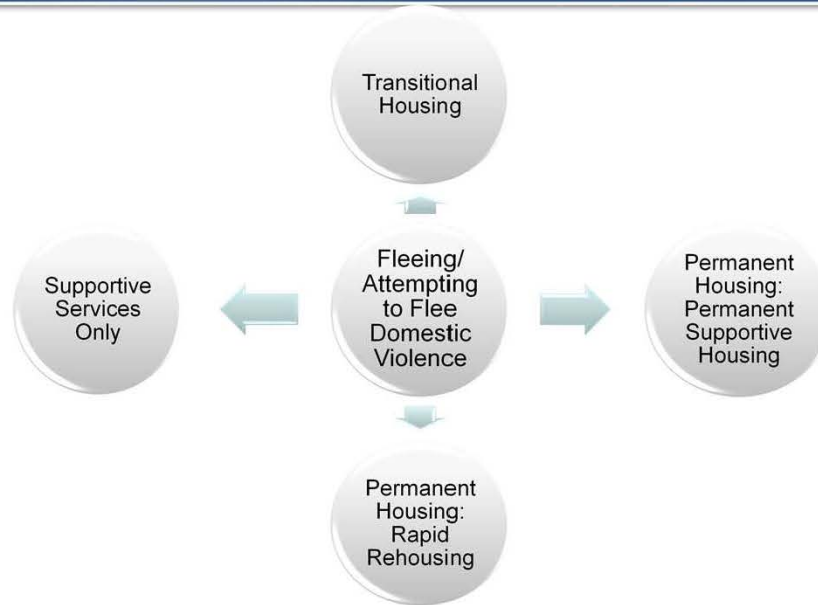
## Documenting Homelessness

- Recipients must have written policies and procedures that:
  - Require intake staff to document eligibility at intake/screening
  - Specify the evidence to rely upon to establish and verify homeless status
  - Include standards for documenting due diligence
- Standards must be consistent with recordkeeping requirements and reflect HUD's preferred order

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Documenting homelessness is one of the most important facets of grant administration. It is required that recipients have written policies and procedures, document eligibility at intake for all program participants, and maintain appropriate records for program participant eligibility according to the CoC Program interim rule. Recipients must also develop and comply with local policies and procedures for homeless eligibility documentation and recordkeeping.

**Documenting Homelessness**

- In order of preference
  1. third-party documentation
  2. intake worker observations
  3. certification from the person seeking assistance
- Appropriate documentation will vary depending on
  - Type of assistance provided
  - Circumstances of the potential program participant, including individuals fleeing/attempting to flee domestic violence
  - Already available documentation
    - Discharge paperwork
    - HMIS service transactions

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To the extent allowable, recipients must adhere to HUD's preferred order for homelessness documentation. This is dependent on the type of assistance provided, the circumstances of program participants, and the availability of existing documentation, namely HMIS records or discharge paperwork.

Remember, in addition, :
- Recipients must participate in the CoC's coordinated assessment system as a part of intake.
- Recipients must follow the CoC's written standards for administering assistance.
- Recipients must have their own policies and procedures for administering assistance.

# TRAINERS GUIDE TO PARTICIPANT ELIGIBILITY: UNDERSTANDING DEFINITION CASE SCENARIOS & QUIZZES

This guide walks through the case scenarios and quizzes presented in the *Participant Eligibility* section of the CoC Start-up Training. The case scenarios and quizzes are focused on reinforcing the eligibility requirements for the following program components under the CoC Program interim rule: PH: PSH, PH: RRH, TH and SSO. Answers and the explanation behind the answers are also included to help the trainer facilitate discussion of responses.

## Definition of Homeless

### Case Scenario 1: Eduardo

25-year old Eduardo recently lost his last job and couldn't pay the rent. He crashed with various buddies until the last one kicked him out.

Eduardo was spotted sleeping outside by his former high school teacher, Pete. Pete said Eduardo could stay at his place but Eduardo is always high, so Pete finally told him he had to find somewhere else to stay as soon as possible (within a week). Eduardo has no other friends or family in the area and no money to pay for a hotel or his own place.

**Q: What is Eduardo's Homeless Status at this moment?**

a. Category 1: Literally Homeless

b. Category 2: Imminent Risk of Homelessness

c. Either. He could qualify as Category 1 or Category 2

d. More information is needed to decide

**Brief Discussion of Answer and Reasons**

**Answer:** (b) Category 2: Imminent Risk of Homelessness. Eduardo is currently doubled-up so he is not literally homeless. Pete has asked him to leave so he is at risk of losing his primary residence; he has no other housing options, financial resources or supports to avoid literal homelessness

**Discussion Points**: Even though Eduardo is sleeping on a couch, he does have a primary residence (Pete's place) and is not literally homeless.

***Note to Trainer**: Sometimes program staff thinks Eduardo should be put back on the street before seeking assistance so he qualifies as Category 1.*

### Case Scenario 2: Traci

Traci (25) has been living with her boyfriend for the past two years. He has always been controlling, but lately he is accusing her of sleeping around and has become physically abusive. One night he threatened to kill her. She believed him and fled, with nothing but the clothes she was wearing. Traci has presented to a homeless shelter for women.

**Q: What is Traci's Homeless Status?**

a. Category 1: Literally Homeless

b. Category 4: Fleeing/Attempting to Flee Domestic Violence

c. Both

d. More information is needed to decide

**Brief Discussion of Answer and Reasons**

**Answer:** (b) Category 4: Fleeing/Attempting to Flee Domestic Violence

**Discussion Points:** Traci is presenting at a homeless shelter for women because the threat of violence has made her afraid to return to her primary nighttime residence. She has no other resources (she left with nothing but the clothes she was wearing) and it is appropriate to assume that she lacks resources or support networks (evidenced by the fact that she is presenting at a homeless shelter) and has no other safe place to stay.

*\*Note to Trainer: be prepared to respond or should bring up the fact that sometimes program staff may believe that Traci is Category 1: Literally Homeless. However, this is not the case as Traci did not lack a fixed, regular and adequate nighttime residence until she was threatened with violence and fled to the homeless shelter. However, if for some reason, the shelter was not able to accommodate Traci immediately and she had to sleep in her car and/or in some other location that is not designed or ordinarily used as a regular sleeping accommodation OR if the shelter admits her, she would then meet the definition of both Category 1: Literally Homeless and Category 4: Fleeing/Attempting to Flee Domestic Violence.*

## Participant Eligibility

### *Case Scenario: Eduardo*

Recall that presently Eduardo has been determined as meeting conditions for Homeless Category 2.

**Q: Based on Eduardo's Homeless Status, what CoC program funded project types might he be eligible for at this moment?**

a. Rapid re-housing

b. Transitional Housing

c. Permanent Supportive Housing

d. Supportive Services Only

**Brief Discussion of Answer and Reasons**

**Answer:** (b) Transitional Housing <u>and</u> (d) Supportive Services Only

**Discussion Points**: Individuals defined as Homeless under Category 2 are eligible for both Transitional Housing and Supportive Services Only.

*\*Note to Trainer: remember that some program staff may believe that Eduardo should be put back on the street before seeking assistance so he qualifies as Category 1 and could therefore possibly access Rapid Re-Housing or Permanent Supportive Housing Assistance. If the topic comes up, make sure that participants discuss why this would be a good or bad idea? Ask participants to consider*

- "What does he need that he could not receive unless he was Literally Homeless (on the streets)—i.e. why would Category 1 be so much better than Category 2?"

- "Is it ethical or a good use of community resources to require Eduardo to become literally homeless to access resources dedicated to persons who are literally homeless?"

- "Would it be more efficient for the CoC system of care and less disruptive for Eduardo if he was linked immediately to homelessness prevention assistance to relocate to his own housing and connected to community-based recovery services, thereby avoiding becoming literally homeless all together (which will happen if he ends up on the street or in a shelter OR if he enters Transitional Housing)?"

## *Case Scenario: Traci*

Recall that initial screening determined that Traci met conditions under Homeless under Category 4: Fleeing from Domestic Violence when she presented to the shelter. The shelter subsequently admitted her and she then qualified as both Literally Homeless under Category 1 and Homeless under Category 4.

**Q 1: The staff at the homeless shelter is trying to connect Traci to other programs. Based on her Homeless Status (Categories 1 and 4), what CoC programs might she eligible to receive?**

a. Rapid re-housing

b. Transitional Housing

c. Permanent Supportive Housing

d. Supportive Services Only

**Answer:** (a) Rapid Re-housing, (b) Transitional Housing, and (d) supportive services only.

**Discussion Points**: Traci might be able to be served by (c) Permanent Supportive Housing, but we can't yet say that with certainty because of the disability requirement for eligibility to PSH.

*\*Note to Trainer: Traci's homeless status is actually fluid in that once she was admitted to the homeless shelter, she now **also** meets the definition of Homeless Category 1: Literally Homeless. From this point forward, she would be determined Homeless Category 1: Literally Homeless; however, she must continue to be **documented** as Category 4: Fleeing DV because of the additional precautions providers must take when documenting the homeless status of individuals/families who are fleeing or attempting to flee domestic violence.*

Video 5: Eligible Participants – Disability and Chronic Homeless Status

Lisa Coffman

## DEFINITION OF DISABILITY
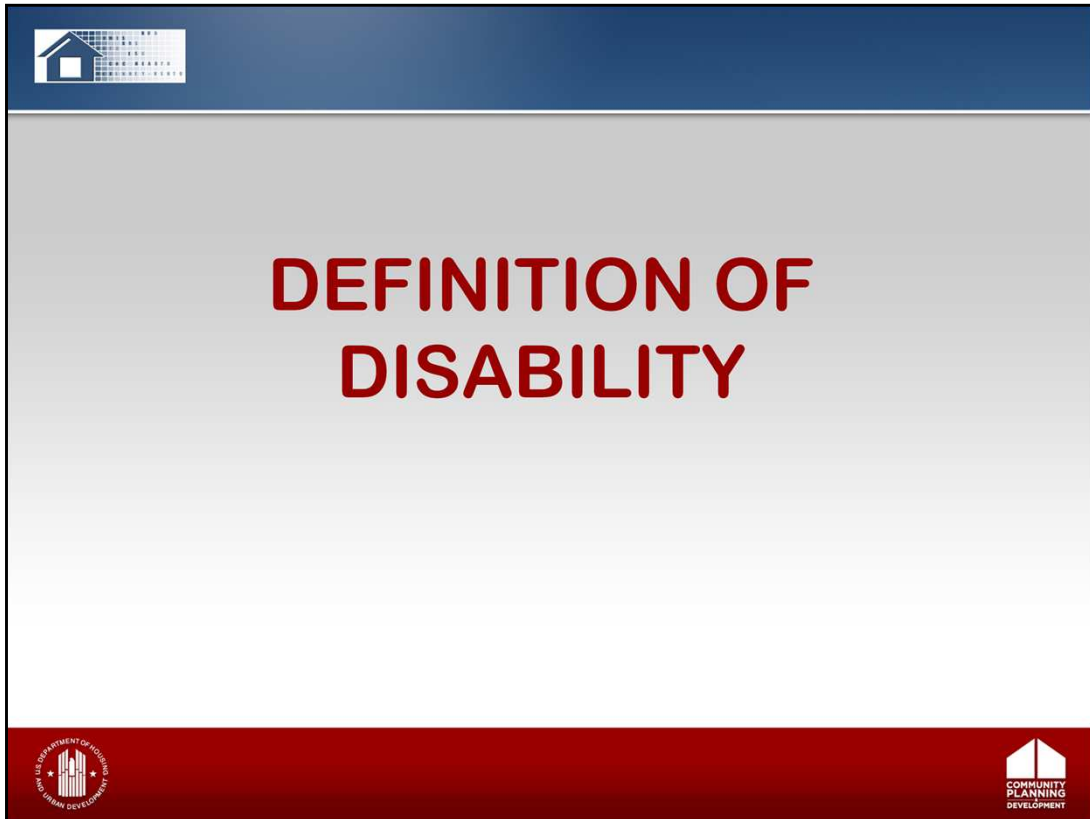
Determining disability status is only required when the disability is a requirement for eligibility into a program.

**Definition of Disability**

- Disability is defined as having one or more of:
  - Physical, mental or emotional impairment
  - Developmental Disability
  - HIV/AIDS
- Definition applies, but is not explicitly included in the CoC Program interim rule.
- Once a program participant's disability is documented, this status does not need to be recertified after intake.

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Disability is defined as one or more of the following:
- Physical, mental, or emotional impairment;
- Developmental disability; and
- HIV/AIDS

The definition of disability was omitted inadvertently in the CoC Program interim rule but will be included in the final rule. The definition is included in the statute so it still applies. Additionally, recipients can use the recordkeeping requirements found in the Final Definition of Homeless to document disability.

Note: As long as the disability status was confirmed upon entry into the program, any subsequent improvement in that disability does not disqualify a program participant's ongoing eligibility for the program. Once the program participant is in the program, the annual requirement for recertification is limited to determining the program participant's income level for the sole purpose of determining the rent or occupancy charge a program participant pays.

**Physical, Mental or Emotional Impairment**

- Physical, mental or emotional impairment that is:
  - Expected to be long-continuing or of indefinite duration
  - Substantially impedes the person's ability to live independently
  - Could be improved by more suitable housing

- Could include impairments caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury

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Physical, mental, or emotional impairment is an impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury, that is expected to be long-continuing or of indefinite duration and substantially impedes the person's ability to live independently and could be improved by more suitable housing.

**Developmental Disability**

- Defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000 (42 USC 15002)
- Means a severe, chronic disability that
  - Is attributable to a mental or physical impairment or combination
    **AND**
  - Is manifested before age 22
    **AND**
  - Is likely to continue indefinitely
    **AND**

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Developmental disability is defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000 (42 USC 15002) that means a severe, chronic disability that is attributable to a mental or physical impairment or combination and is manifested before age 22 and is likely to continue indefinitely and…

Results in substantial limitations in three or more major life activities

**Developmental Disability (continued)**

– Reflects need for
- A combination and sequence of special, interdisciplinary or generic services

  **OR**

- Individualized supports

  **OR**

- Other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated

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Reflects the need for a combination and sequence of special, interdisciplinary or generic services or individualized supports or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

**Developmental Disability (continued)**

- An individual may be considered to have a developmental disability without meeting 3 or more of the criteria listed previously, if
  - Individual is 9 years old or younger

    **AND**
  - Has a substantial developmental delay or specific congenital or acquired condition

    **AND**
  - Without services and supports, has a high probability of meeting those criteria later in life

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An individual may be considered to have a developmental disability without meeting 3 or more of the criteria listed previously, if the individual is 9 years old or younger and has a substantial developmental delay or specific congenital or acquired condition and without services and supports, has a high probability of meeting those criteria later in life.  Projects are encouraged to work with licensed medical professional to document these criteria have been met.

**HIV/AIDS Criteria**

- Includes the disease of acquired immunodeficiency syndrome (AIDS)

  **OR**

- Any conditions arising from the etiologic agent for AIDS including infection with HIV

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The definition of disability includes the disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS including infection with HIV.

## Documenting Disability for PSH

- PSH projects may only accept homeless persons with qualifying disability, documented by verification from:
  - a professional who is licensed by the state to diagnose and treat that condition

    **OR**

  - Social Security Administration (SSA) for persons receiving disability benefits
    - VA Disability check
    - SSI/SSDI check
- For physical, mental, or emotional impairment, verification must state that the disability
  - Is expected to be long-continuing or of indefinite duration
  - Substantially impedes the individual's ability to live independently
  - Could be improved by the provision of more suitable housing conditions

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If disability is a requirement for eligibility into a program, recipients and subrecipients must document the disability status of all program participants at intake. Written third-party verification from a licensed medical professional, the Social Security Administration, or the receipt of a disability check are the most common and preferred documents for documenting disability.

Intake staff observations are only acceptable in the absence of third-party verification and must be confirmed and accompanied by written third-party verification no later than 45 days from initial intake. Oral third-party and self-certification are not appropriate for documenting disability.

If a participant is deemed eligible by meeting criteria of developmental disability or HIV/AIDS, they are not required to pass the 3-part test for disability.

## Definition of Chronically Homeless

- An individual who:
    - Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
    - Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
    - Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

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The definition currently in effect is that which was included in the CoC Program interim rule which states that a person is chronically homeless if they have been homeless for at least one year continuously or has experienced four episodes over the last three years. For this definition, the persons must have been homeless in a place not meant for human habitation, in an emergency shelter, or in a safe haven.

- In addition, persons must be diagnosed with one or more of the following conditions:
- Substance use disorder
- Serious mental illness
- Developmental disability
- Post-traumatic stress disorder
- Cognitive impairments resulting from brain injury, or
- Chronic physical illness or disability

## Chronically Homeless Considerations

- 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 of chronically homeless; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

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A person coming from an institution where they have resided for 90 days or less may also qualify, provided that they met the criteria stated on the previous slide prior to entering the institution.

Persons in transitional housing—even if they met the chronic homelessness criteria prior to entering the transitional housing program—may not be considered chronically homeless.

Also, for a family to be considered chronically homeless, the adult head of household (or minor head of household if there is not an adult) must meet the criteria of chronic homelessness discussed in the previous slide (even if the composition of the family has fluctuated while the head of household has been homeless) .

# Video 6: Match

*Lisa Hill*

## Understanding Match

- Match must be in the form of cash or in-kind contributions
- Is spent by or donated to the recipient or subrecipient to cover eligible costs of the project
- Costs incurred by a partner organization to provide "in kind" services to program participants must be documented by a MOU prior to grant agreement execution.

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Match is defined as the recipient's contribution to the project. Match in the CoC Program is defined as the minimum required cash or in-kind contributions for a project. Match in the CoC Program is restricted to the costs identified in Subpart D of the CoC Program interim rule and the applicable OMB Circulars.

Match in the CoC Program may be in the form of cash or in-kind contributions and must be used by the recipient or subrecipient on costs for the project.

Eligible in-kind match contributions that a recipient or subrecipient may use are: the value of real property, equipment, goods and services. More simply, an in-kind match contribution is a donation or gift of time, internal fiscal resources, professional expertise, use of facilities, project sponsorship, equipment, or other comparable donations without charge, that are equal to direct financial contributions from one or more private or public organizations.

All in-kind match contributions for services must be documented by a Memorandum of Understanding (MOU) between the recipient or subrecipient and the third party that will provide services. In-kind match contributions for goods, equipment, and real property do not require an MOU but most be documented.

Recipients must ensure that any funds used to satisfy the matching requirements are eligible under the interim rule to ensure that the funds from other sources are not statutorily prohibited to be used as match. Matching contributions must meet the other federal requirements for nonprofit organizations and states and units of general local government.

## What Is Not Match?

- Program income
- Cash or any in-kind contribution used as match for another grant.
- Cash or in-kind contributions statutorily prohibited as match.
- Program Participant Savings
  - Savings belong to the program participant, not the recipient or subrecipient

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Where program participant rent and occupancy charges are provided to the recipient or subrecipient they are considered program income and are, therefore, prohibited from using such income to meet match requirements. Cash or in-kind contributions used as match for another grant or whose funding stream statutorily prohibits them to be used as match are also not allowed to be used as match. Finally, program participants' savings are prohibited from being used as match. Savings belong to the program participant, not the recipient or subrecipient.

## What is Leverage?

- Separate and distinct from matching
- Cash or in-kind contribution in excess of the minimum required match
- Can be any financial assistance from public or private resources
  - Does not include benefits received directly by the program participant

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Match and leverage are separate and distinct. Leverage is over and above match; in other words, an amount that is listed as leverage in the project application may not also be listed as match on the project budget.

Leverage in the CoC Program is cash or in-kind contributions in excess of the minimum required match contributions for a project. A recipient/subrecipient also may use leveraged funds for other aspects of a project even if the costs are not allowable in the CoC Program.

Any financial assistance that comes from public or private resources can be counted as cash leverage. Services (counseling, legal advocacy, etc.) and physical goods (food, furniture, clothing, etc.) can be counted as in-kind leverage. The funds, goods, or services would need to come directly from the source to your organization. Benefits such as food stamps or TANF (cash assistance for program participant) received directly from the program participant **cannot** be counted as leverage. Supportive services that are provided to a program participant by a third party **can** be counted as an in-kind leveraging source.  Rents and occupancy charges collected by program participants is considered program income, which is also **not** considered an eligible source of match or leveraging.

## Match Requirements

- All CoC Program costs and match must be in your approved budget
- Must be able to document all costs
- Match requirement - 25% cash or in kind for all line items except leasing
- Match is provided to the CoC Program grant - not to a specific budget line item
- Matching funds can only be used on eligible CoC Program costs

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The CoC Program requires recipients to provide cash or in-kind match valued at 25 percent of the amount of the CoC Program grant award, less the amount received for leasing. Cash or in-kind match must be provided on a grant-by-grant basis, unless the recipient is a UFA or is the sole recipient for the CoC. All budget line items must be included in the calculation, except leasing.

This slide displays samples of how required match is calculated.

## Match and Budget Line Items

| Cost | CoC Program Funds | Match | Total |
| --- | --- | --- | --- |
| Operating | $100,000 | $0 | $100,000 |
| Services | $0 | $25,000 | $25,000 |
| Project Administration | $10,000 | $2,500 | $12,500 |
| | $110,000 | $27,500 | $137,500 |
| | | | |

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The CoC Program does not require that the match be for the same budget line item that is approved in the grant. For example, under the CoC Program, $100,000 of operating funds may be matched with $25,000 cash that is expended on eligible supportive services or with $25,000 of in-kind services, or a combination of the two.

**Documenting Match at Grant Agreement Execution**

- Must document formal match agreement (e.g., MOU for in-kind) prior to grant agreement

- If recipient needs to change its matching source, the match agreement must be in place before a new source can be counted as match

- Must demonstrate match is spent on eligible activities and incurred within the grant period

- Must keep source documentation (e.g., MOU) on file for review when needed

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Match must be cash or in-kind contributions for costs incurred by the project. Either at the time of application or prior to grant execution, a recipient and/or subrecipient is required to document the amount and sources of its cash and in-kind match.

The documentation must also demonstrate that the matching funds or services were expended on eligible costs identified in Subpart D of 24 CFR part 578.

**Match Documentation for Cash**

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

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When the source is cash, written documentation must be provided on the source organization's/agency's letterhead, signed and dated by an authorized representative, and at a minimum, must include the following:
- Amount of cash to be provided to the recipient and/or subrecipient for the project
- Specific date the cash will be made available
- The actual grant and fiscal year to which the cash match will be contributed
- Allowable activities to be funded by the cash match

During the grant term, cash match must be documented as part of the recipient's or subrecipient's financial system, in other words, the general ledger must document the deposit and expenditure of funds.

## Match Documentation for In-Kind Goods

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

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To substantiate donations of in-kind goods and equipment, written documentation of the in-kind contribution must be provided on the source agency's letterhead, signed and dated by an authorized representative, and must, at a minimum include the following:
- Value of donated goods to be provided to the recipient for the project
- Specific date the goods will be made available to the recipient and/or subrecipient
- The actual grant and fiscal year to which the match will be contributed

The value of commitments of land, buildings, and equipment are one-time only and cannot be claimed by more than one project or by the same project in another year

**Match Documentation for In-Kind Services**

- An MOU for In-kind Services must be in place prior to provision of the service:
- The MOU must:
    - Provide an unconditional commitment to provide the service
    - Describe the specific service to be provided
    - Indicate the profession of persons providing the service and hourly cost of the service
    - The timeframe in which services will be provided
    - The system that will be used to document the actual level and value of services as provided

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Documentation of in-kind services must be provided through an MOU between the recipient/subrecipient and a third party. The MOU must establish the specific services to be provided, the profession of the persons providing the service, the hourly cost of the services being provided, and the timeframe during which the services will be provided. The services must be provided during the term of the grant to count as match. In the MOU, the recipient/subrecipient must establish a system to document the actual value of services provided during the grant term. The recipient/subrecipient must keep and make available for inspection any MOUs and records documenting the service hours provided by the third party.

Video 7: Project Changes and Timeliness Standards

*Robert Waters*

# CHANGES THAT REQUIRE GRANT AMENDMENTS
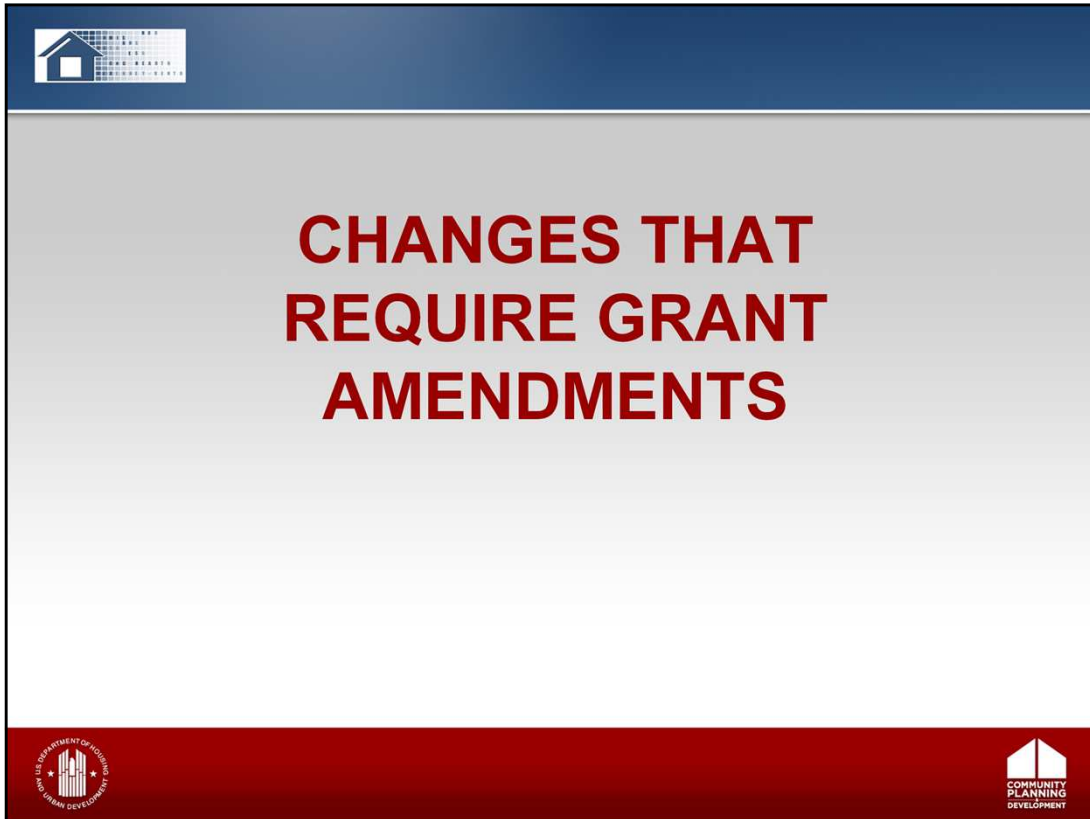
Over the life of a CoC Program-funded project, it could be necessary to change aspects of the program.

**What is a Significant Change?**

Significant changes require HUD approval through a formal grant amendment.

**For CoCs with more than one recipient, significant changes are:**
- Change of recipient
- A shift of over 10% of the total amount awarded for one eligible activity to another activity
- A reduction in the number of units
- A change in the subpopulation served
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project

**For CoCs with only one recipient and UFAs, significant changes are:**
- Change of recipient
- A shift of over 10% of the total amount awarded for one eligible activity to another activity
- Permanent change in the subpopulation served
- Permanent reduction in the total number of units

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Any "significant change" to a grant requires a grant amendment before any change may be finalized. Additionally, there are contingencies that must be met before HUD will approve the grant amendment. There are different standards for "significant change" for UFAs/CoCs with one recipient vs. CoCs with more than one recipient

Requirements in the interim rule set forth the parameters for grant and project changes. For CoCs with more than one recipient, significant changes are defined as: a change of recipient, a change of project site, additions or deletions in the types of eligible activities approved for a project, a shift of more than 10 percent from one approved eligible activity to another eligible activity, a reduction in the number of units, and a change in the subpopulation served.

**How To Request an Amendment**

- For significant changes, recipients should:
  - Prepare a detailed, written request to the local HUD CPD Field Office
  - Explain the reason for the change
  - Justify same or better level of service will be provided
  - Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

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For significant changes, recipients should:
- Prepare a detailed, written request to the local HUD CPD Field Office
- Explain the reason for the change
- Justify same or better level of service will be provided and
- Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

## Minor Changes

- For minor changes, the recipient must:
  - Fully document any changes
  - Notify the Field Office of the change so LOCCS and other reporting systems can be adjusted
  - Maintain documentation and make it available to HUD during monitoring and compliance reviews or upon request

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The CoC Program interim rule also specifies that recipients may make other grant and project changes that do not substantially change the scope of the project and therefore do not require a grant amendment. Minor grant and project changes include a shift of less than 10 percent of funds from one approved eligible activity to another approved activity.

Changes that do not require a grant amendment must be documented in recipient's and subrecipient's records and the recipient must notify HUD so that the grant files can be updated properly and LOCCS can be updated to allow for draws under the changes, as necessary.

# TIMELINESS STANDARDS

**Timeliness Standards: Initiating Projects**

- Recipients must *promptly* initiate approved CoC Program-funded projects.
  - Construction activities must begin within 9 months and be complete within 24 months
  - Activities that are dependent on the construction must begin within 3 months of construction completion

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Each recipient must adhere to certain standards of timeliness.  Recipients must promptly initiate approved CoC Program activities and projects.

For rehabilitation and new construction CoC Program activities:
- Recipients/subrecipients must begin construction activities within 9 months of signing the grant agreement.  Construction activities must be completed within 24 months of signing the grant agreement.
- Activities that cannot begin until after construction is completed must begin within 3 months of the date that construction activities are complete.

Recipients should inform HUD as soon as they suspect they may have difficulty meeting timeliness standards to determine if there are other strategies that can be taken.  Recipients in non-compliance are subject to all CoC Program funds being deobligated, which involves returning funds to HUD.

**Timeliness Standards: Expenditures**

- Once activities begin, recipients must draw down funds at least once per quarter.
- Recipients must distribute funds to subrecipients in advance of expenditures
- Recipients must distribute funds to subrecipients within 45 days of receiving an approvable request.

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Once eligible activities begin, recipients must draw down funds at least once per quarter during the program year.

The timeliness standards for distributing funds to subrecipients are:

- Recipients must distribute funds to subrecipients in advance of expenditure of the funds by subrecipients. HUD is in the process of developing guidance to help recipients and subrecipients appropriately implement this timeliness standard.
- Recipients must distribute the appropriate portion of the funds to its subrecipients no later than 45 days after receiving an approvable request from the subrecipient for such distribution.

**Operating Start Date and Program Year**

- Operating start date sets beginning of 12-month program year for spending and reporting
  - New projects without acquisition or construction start the 1st day of month that the recipient incurs eligible costs
  - New projects with acquisition or construction starts the 1st day of month following completion of acquisition or construction
  - Renewal grants start the day after the end of previous grant term

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It is important for recipients and CoCs to know the operating start date for all projects, as it sets the beginning of the 12-month program year. This will frame the timeline for individual project operation.

The Operating Start Date (OSD) indicates when the term of the grant begins, that is, when the project begins to serve homeless persons.

For non-construction projects, the operating start date is determined as the first day of the month in which the recipient or subrecipient begins incurring eligible operating, supportive service, leasing or rental assistance costs.

For new projects with acquisition/rehabilitation/construction costs, the operating start date is the earlier of the first day of the month following purchase of the property or completion of construction activities (the date the recipient receives the Certificate of Occupancy) OR the date the NOFA established as the deadline to begin operating the project.

For renewal projects, the operating start date and the grant term begin the day after the end of the previous grant term.
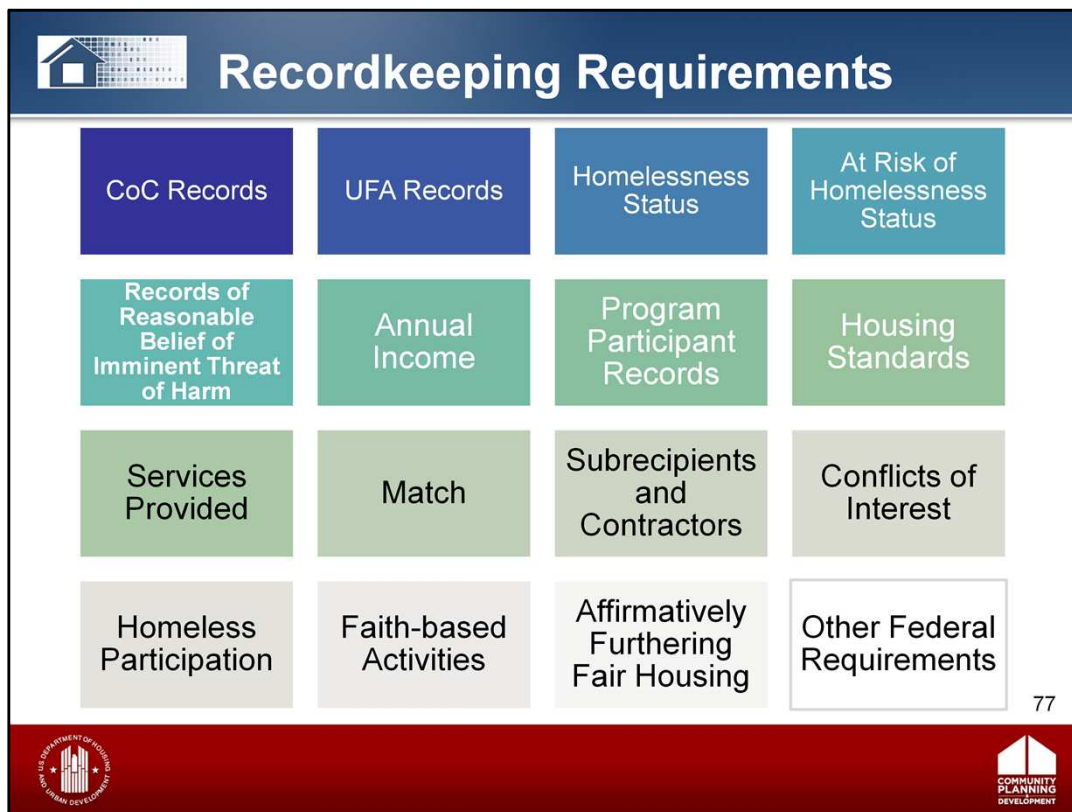
The recipient has to enter the operating start date for the project in LOCCS when it begins to draw non-construction funds for the project.

Video 8: Recordkeeping Requirements

Robert Waters

A key piece of overall program management is documentation. Keeping good records documents program accomplishments, and the benefits of good recordkeeping are numerous. It allows recipients and subrecipients to track what works and what does not, enables recipients and subrecipients and HUD to measure the effectiveness of services provided, and makes it easier and quicker to apply for funds and report compliance to funders.

Keep in mind that this is relevant for the recipient – who works directly with HUD – as well as the project subrecipients who are operating the program. Everyone must participate and support the effort, especially for the activities for which they are responsible!

Recipients must maintain records to document compliance with all of the areas detailed on the slide.

**Recordkeeping Requirements**

- Recipients and subrecipients must:
  - Obtain documentation from qualified source(s) in accordance with the requirements of the interim rule
  - Maintain the records in your organization, project, and program participant files

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Recordkeeping includes documenting activities, maintaining files, and monitoring at least annually for compliance.

Recipients are required to obtain documentation from qualified source(s) as needed in each category.  Each recipient must design a system to maintain relevant records for your organization, recipient, subrecipients, and program participants.

**Recordkeeping Requirements**

- Confidentiality
  - All records containing protected information must be kept secure and confidential
  - The address or location of any program participant must not be made public
- Record Retention
  - All non-construction records must be retained for at least 5 years
  - Participant eligibility documentation must be retained for 5 years after final expenditure of relevant grant
  - Acquisition, new construction, or rehabilitation records must be retained for 15 years after the date the project site is first occupied

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All records containing protected information must be kept secure and confidential, and all records must be retained for at least 5 years.  Records related to construction must be retained for at least 15 years from the date the project site is first occupied.

See the interim rule for more information on recordkeeping requirements.

# RECORDKEEPING REQUIREMENTS BY GROUP COC PROGRAM INTERIM RULE SECTION 578.103(A)

## Organizational Recordkeeping Requirements

Documentation must be recorded at the organizational-level, meaning each recipient and/or subrecipient, for these areas:

| | |
|---|---|
| **Standard Operating Procedures**<br>Procedures for ensuring that CoC Program funds are used in accordance with the requirements of the CoC Program interim rule | **Other Federal Requirements**<br>Documentation of compliance with Section 578.99<br><br>• Environmental Review*<br>• Section 6002, Solid Waste Disposal Act<br>• Transparency Act Reporting<br>• Coastal Barrier Resources Act of 1982<br>• Uniform Administrative Requirements<br>• Lead-based Paint<br>• Audit<br>• Section 3 of the Housing and Urban Development Act of 1968 and its implementing regulations at 24 CFR part 135 |
| **Participation of Homeless Individuals**<br>Documentation of compliance with Section 578.75(g) | |
| **Faith-based Activities**<br>Documentation of compliance with Section 578.87(b) | |
| **Fair Housing and Equal Opportunity**<br>Documentation of compliance with Section 578.93(c) | |
| **Conflict of Interest (organizational and individual)**<br>Documentation of compliance with Section 578.95 | |

\* Depending on the program component funded, additional documentation may be required at the project or program participant level.

## Project-level Recordkeeping Requirements

Documentation must be recorded at the project-level, meaning for each grant, for these areas:

| | |
|---|---|
| **Match Sources and Uses**<br>Documentation of compliance with Section 578.73 | **Ongoing Assessment of Services Offered**<br>Documentation of compliance with ongoing assessment of overall service needs (Section 578.75(e)), accounting of services provided and amounts spent, and adjustment to service package offered [Section 578.103(a)(9)] |
| **Subrecipient and Contractor Oversight**<br>Documentation of compliance with Section 103(a)(16) and requirements in 24 CFR 85.36 and 24 CFR part 84 | **Supportive Service Agreement**<br>Documentation of compliance with Section 578.75(h) regarding restrictions on mandatory service participation |
| **Project-specific Policies and Procedures**<br>Policies and procedures regarding documentation of program participant eligibility and all other aspects of program operation to ensure compliance and consistency among staff. | **Housing Standards***<br>Documentation of compliance with Section 578.75 |

\* Depending on the type of housing assistance offered, additional documentation may be required at the program participant level.

## Program Participant-level Recordkeeping Requirements

Documentation must be recorded for each program participant for each of these areas:

| Homeless Status<br>Documentation of compliance with<br>24 CFR 576.500(c) | Program Participant Records<br>• Documentation of compliance with requirement to annually assess program participants' service needs [Section 578.75]€ |
| --- | --- |
| | • Documentation of compliance with service provision requirements for RRH projects [Section 578.37(a)(1)(ii)(F)] |
| Other Program Eligibility Verification<br>Documentation of compliance with program participation eligibility criteria, as defined in the NOFA under which the project was funded | • Documentation of compliance with Termination of Assistance requirements, when necessary [Section 578.91] |
| Records of Reasonable Belief of Imminent Threat of Harm<br>Documentation of compliance with Section 578.51(c)(3), with additional details specified in Section 578.103(a)(5) | Annual Program Participant Income<br>Documentation of compliance with Section 578.103(a)(6) |

# Video 9: Monitoring and Compliance

## *Robert Waters*

**Monitoring**

- Purpose of monitoring is to determine whether grant activities are implemented:
  - In compliance with statute, 24 CFR part 578, NOFA, Notices, OMB Supercircular, and other programmatic guidance
  - As approved in application
- Recipients must monitor subrecipients annually
- Recipients and subrecipients should monitor themselves at least annually
- Monitoring review can be remote or on-site

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To ensure that all Federal statutory and regulatory requirements have been fulfilled, HUD will monitor recipients and subrecipients. However, recipients should also self-monitor and must also monitor their subrecipients at least annually to ensure that they and all of its subrecipients are adhering to statutory and regulatory requirements. Monitoring will help all parties ensure that the recipient implements the project as indicated in the executed grant agreement and APR, that grant funds are drawn in a timely fashion, and that the recipient is achieving the program goals as set forth in the project application.
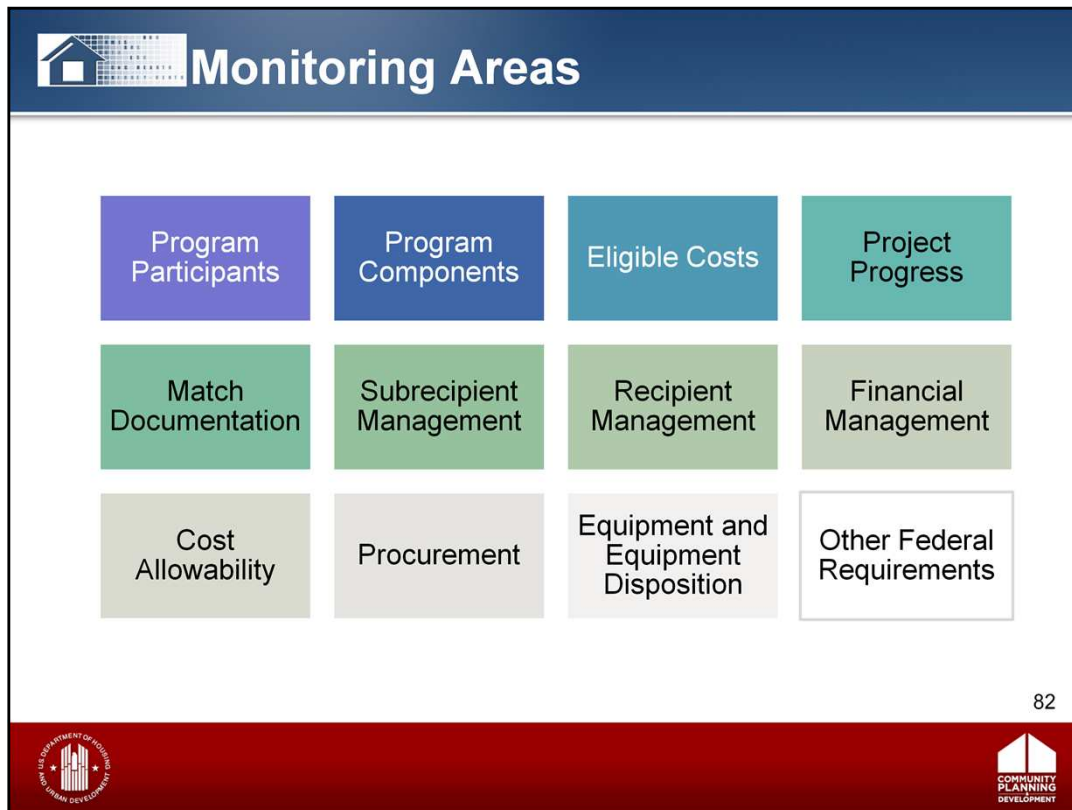
Areas that should be addressed as part of monitoring include: program participants eligibility, program components, eligible costs, project progress, meeting the match and maintaining appropriate documentation of match, subrecipient management, recipient management, financial management, cost allowability, procurement standards, equipment and equipment disposition, other federal requirements.

**Possible Monitoring Finding :
Eligibility Documentation**

- Check that files include documentation of homeless status and disability (if relevant)
- Examples of compliance issues:
  – Case notes do not illustrate program participant's situation, barriers, and needs
  – Initial consultation files not signed/dated by the case worker
  – Unclear chronology when documenting chronic homelessness episodes
  – Disability not documented or signed by a person not credentialed to make a diagnosis

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Recipients and subrecipients are responsible for ensuring their projects serve only eligible program participants and for securing and maintaining documentation that verifies eligibility.

Here are a few examples of typical compliance issues related to verifying homeless status and disability:

- Case notes do not illustrate program participant's situation, barriers, needs, and other factors
- Initial consultation files are not dated or signed by the case work
- The chronology of homeless episodes are not clearly documented
- Disability is not documented or documentation is signed by a person not credentialed to make a diagnosis

**Possible Monitoring Findings: Supportive Services**

- Check for annual assessment of service needs of project participants and corresponding adjustment of supportive service plan
- Examples of compliance issues:
  - Individual supportive services plans not in program participants' files
  - Ongoing program participant assessments not completed and/or documented in file

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Recipients and subrecipients must conduct an annual assessment of service needs of project participants. The supportive services must be adjusted accordingly.

Common compliance issues:
- Individual supportive services plans are not in program participants' files
- Ongoing program participants' annual assessments are not completed and/or documented in file

**Possible Monitoring Findings: Financial Documentation**

- Check for complete financial documentation and adequate financial systems
- Examples of compliance issues:
  - Missing or insufficient documentation for incurred expenses and/or ineligible expenses
  - Drawing part of the grant from LOCCS each month with no support documentation
  - Reimbursement of expenses incurred outside the grant term
  - Insufficient subrecipient financial documentation
  - Salary costs are not tied to an eligible grant expense
  - Rent is paid to someone who is not the property owner

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Recipients and subrecipients should monitor themselves annually, and recipients must monitor subrecipients annually, to verify that their financial systems and documentation are sufficient to substantiate the use of grant funds and are operated in accordance with generally accepted accounting principles and any applicable Federal requirements.

Examples of financial compliance issues are:
- Missing or insufficient documentation for incurred expenses and/or ineligible expenses
- Drawing a percentage of the grant each month with no support documentation of why funds were drawn from LOCCS
- Reimbursement of expenses incurred outside the grant term
- Lack of financial oversight for subrecipients
- Salary costs cannot be tied to an eligible grant expense
- Paying rent to someone who is not the property owner

Recipients and subrecipients should monitor at least annually to check that income verification is completed as required, that rent and occupancy charges are calculated properly, that income and rent documentation is maintained, and that amounts paid with CoC Program funds are within allowable limits.

Examples of common rent compliance issues are:
- Overcharging rent
- Inadequate or no income verification
- Not reviewing program participant income annually or when a household's income changes
- Charging fees other than rent or occupancy charge

**Possible Monitoring Findings: Match**

- Check that appropriate and sufficient match has been provided and documented
- Examples of compliance issues:
  – Insufficient match
  – In-kind services provided by a third-party counted as match but not provided under an MOU
  – Ineligible sources used as match
  – Inadequate tracking and documentation of match

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Recipients and subrecipients should monitor to verify that appropriate and sufficient match has been provided and documented for each grant.

Here are some examples of match compliance issues:
- Insufficient Match
- In-kind services provided by a third-party without an MOU are counted as match
- Ineligible sources are used as match
- Match is not adequately tracked or documented

**Possible Monitoring Findings: Staff Time Distribution**

- Check that staff time and associated costs charged to the project are explicitly tracked by eligible activity
- Examples of compliance issues:
  - Grant files do not include records documenting the specific hours staff worked
  - Timesheets are not signed or dated by supervisor
  - Staff time records do not indicate how the time relates to eligible activities
    - Salary costs must be directly linked to serving program participants or other eligible costs in the CoC Program
  - Records do not demonstrate that case managers worked with program participants during time charged to the project
  - Records do not show cost documentation associated with staff time charged to the project
    - Specific cost documentation, such as payroll, must be used to substantiate the amount drawn
    - Grant draws must be based on actual, rather than estimated fringe

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Recipients and subrecipients should monitor to ensure that staff time and associated costs charged to the project are explicitly tracked by eligible activity.

For staff who perform operations and other functions such as supportive services and/or who work in multiple projects: costs must be split between functions and documented (e.g., through time and activity reports) to substantiate how costs were assigned.

Some common compliance issues related to staff time documentation are:
- Grant files do not include records documenting the specific hours staff worked.
- Timesheets are not signed or dated by supervisor
- Staff time records do not indicate how the time relates to eligible activities. Salary costs must be directly linked to serving program participants or other eligible costs in the CoC Program
- Records do not demonstrate that case managers worked with program participants during the time charged to the project
- Records do not show cost documentation associated with staff time that was charged to the project. Specific cost documentation, such as payroll costs, must be used to substantiate the amount drawn for staff costs. For example, grant draws must be based on actual rather than estimated fringe.
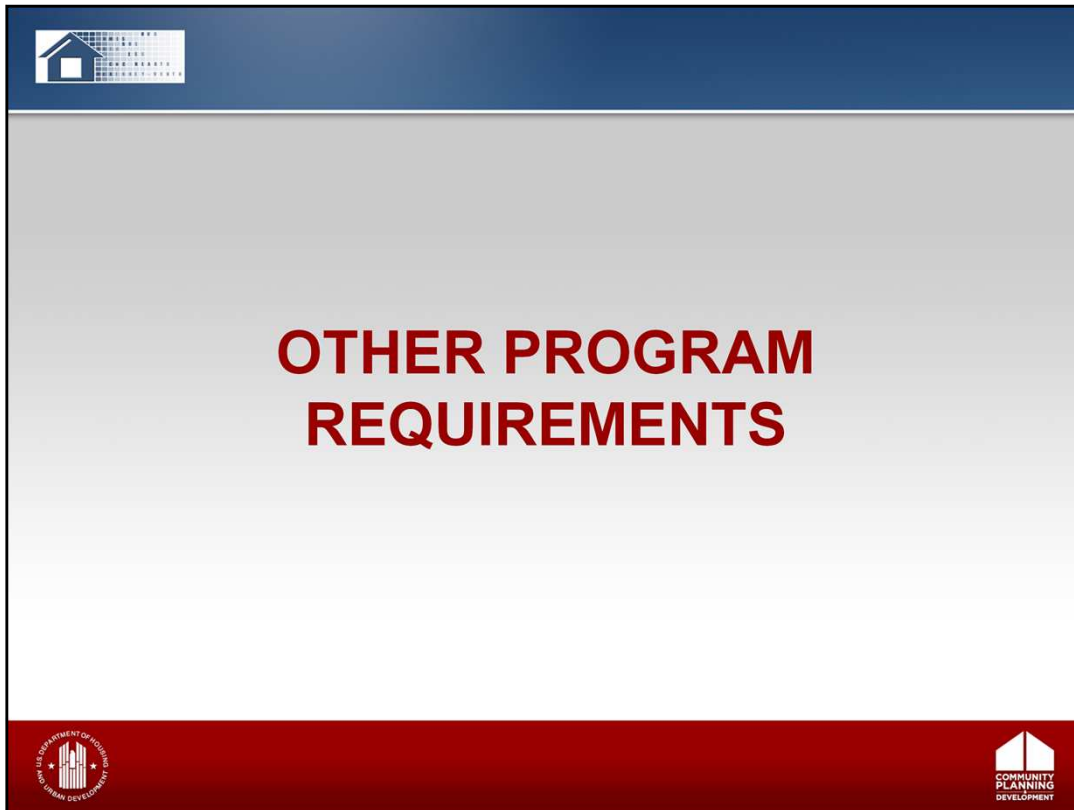
Recipients and subrecipients must also comply with other program requirements, as specified in the CoC Program interim rule. Some of these requirements are described in this section, but recipients should review Subpart F of the interim rule to get a fuller understanding of the requirements.

**Conflicts of Interest**

- Procurement
  - Must comply with codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofits)
- Continuum of Care board members
  - Cannot influence decisions regarding award of grants
- Organizational conflict
  - Recipient /subrecipient is unable to render impartial assistance in the provision of any type or amount of assistance
  - Objectivity in performing work might be otherwise impaired
- Other conflicts
  - No covered person, may obtain a financial interest or benefit from an assisted activity

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The conflict of interest examples as listed in the interim rule are:
- Procurement: recipients must comply with codes of conduct and conflict of all interest requirements under 24 CFR 85.36 or CFR 84.42.
- Continuum of Care board member: no Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
- Organizational conflict: An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired.
- Other conflicts: No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

**Participation of Homeless Individuals**

- Recipients and subrecipients must document its compliance with the homeless participation requirement under 24 CFR 578.75(g)
  – Must provide for the participation of not less than one homeless or formerly homeless individual on the agency board or equivalent policymaking entity
  – Must involve homeless individuals and families in the creation and operation of the project

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Recipients and subrecipients must:
- Provide for the participation of not less than one homeless or formerly homeless individual on the agency board or equivalent policymaking entity
- To the maximum extent practicable, involve homeless individuals and families – through employment, volunteer services, or otherwise – in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

On the slide are other program requirements that recipients and subrecipients should be aware of.

# Video 10: HMIS Recordkeeping Requirements

**Karen DeBlasio**

The intent of this presentation is to provide an overview of the data collection requirements for projects funded under the CoC Program interim rule, to describe when data must be collected from clients, and for recipients to consider what they need to do to prepare for data collection under the newly published 2014 HMIS Data Standards. Please recognize that this information is not comprehensive, and you can talk with your HMIS lead and review the 2014 HMIS Data Standards Guidebook to obtain additional detail about the data collection requirements for CoC Program-funded projects.

**Context for HMIS Data Standards**

- Homeless Management Information System (HMIS)
- HMIS data collection required for all Continuum projects, with additional requirements for CoC Program-funded projects
- First data standards released in 2004
- 2014 revisions reflect a collaborative process with HUD, VA and HHS
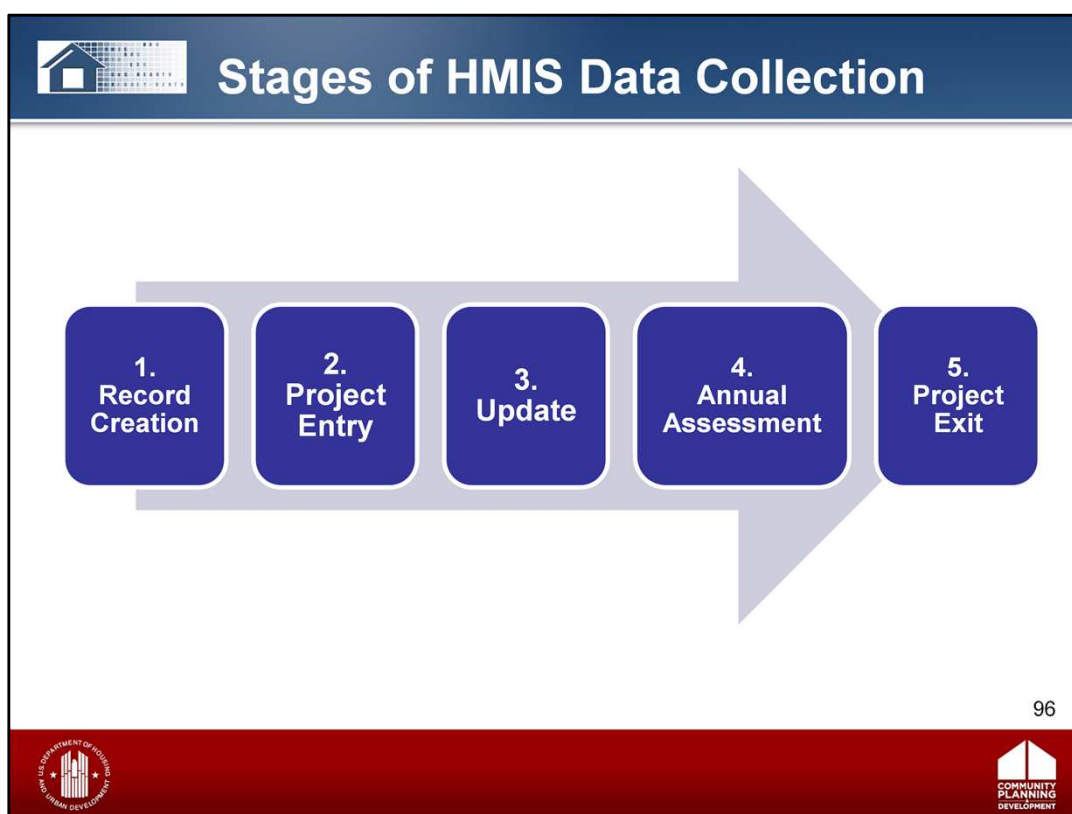  - HMIS software are being updated now

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HMIS stands for Homeless Management Information System. HMIS are locally operated, and it is the responsibility of the CoC to both select an HMIS software and to designate an agency as the HMIS Lead to oversee the day-to-day management of the HMIS. HUD has published HMIS Data Standards that detail the data elements that each HMIS must include in order to fully capture data about people experiencing homelessness.

All homeless assistance projects in the Continuum are required to enter some level of information about the projects themselves or the people they serve, but CoC Program-funded projects have additional data collection requirements. The data collection requirements for both groups – those funded by HUD and those not – are specified in the HMIS Data Standards. The HMIS Data Standards were first released in 2004, but have been recently updated this year. Please note that this presentation reflects the data collection requirements that will be in effect starting October 1st 2014, so in a few cases, some of the data elements described may not need to be collected until that point. Currently, HMIS software vendors are updating their HMIS software to be compliant with the 2014 HMIS Data Standards.

The revised standards are the first ever joint release between HUD, VA, and HHS, and each federal partner (including HUD) will also release a companion Program-Specific manual that provides further instructions for the projects it funds.

**Stages of HMIS Data Collection**

1. Record Creation
2. Project Entry
3. Update
4. Annual Assessment
5. Project Exit

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Before we discuss which data elements must be collected by CoC Program-funded projects, we need to look at the five points of time when data are required to be collected: record creation, project entry, update, annual assessment, and project exit.

Some data may only be required to be collected during one of these phases, while others will be collected during multiple phases.

**Record creation** is the point when the program participant is first entered into an HMIS. Key identifiers for the program participant, such as name, date of birth, and Social Security Number are entered at this point. This information may later be edited to correct data entry errors or to reflect changes, but a recipient is not required to update these fields at a later point. Note that this is a bit different than project entry.

Some data elements need to be tied to the date the program participant enters a project, referred to as **Project Entry**. If the program participant enrolls in a different project, that project would also have to collect the specified information at the point of entry into that project.

Some data elements must be collected at multiple points during an enrollment in order to show changes over time. The data collection stage for information collected while the client is enrolled but before the program participant has exited is called "**Update**". Update records are created for some data elements (e.g., Client Location, Physical Disability, Domestic Violence) during an enrollment only if the information changes. An update always means that a new record is created and that records that reflect the client's previous responses (e.g. at project entry or earlier updates) are preserved.

Continuum projects are required to collect some data elements (Income and Sources, Non-Cash Benefits, Health Insurance) as part of an **annual assessment.** An annual assessment is a special kind of update – one that takes place every year within 30 days of the anniversary of the program participant's project entry date.

Lastly, the **project exit** stage identifies information collected as the program participant is exiting a project and must always reflect the program participant's circumstances on the project exit date. As with the project entry stage, some data elements are collected only at exit (e.g., Project Exit Date and Destination), while others are collected at earlier points in the enrollment as well.

The HMIS Data Standards Manual identifies required collection points for each data element. If you are ever uncertain as to how frequently a data element should be collected, please consult with your HMIS System Administrator.

**Stage 1: Record Creation**

- Name
- Social Security Number
- Date of Birth
- Personal ID
- Gender
- Veteran Status

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These five data elements are required in order to create a record in an HMIS for a program participant. Since this type of information typically does not change over time, these elements are not required to be collected beyond record creation. However, if you do have an update to the record (such as confirmation of Veterans Status or a corrected Date of Birth), then these updates should be entered into your HMIS.

Since these data elements are not unique to a specific project, it is possible they will already be entered in the HMIS at one point when the record if first created in the system.

**Stage 2: Project Entry**

- Project Entry Date
- Household ID
- Relationship to Head of Household
- Housing Status
- Residence Prior to Project Entry
- Length of Time on Street, in ES or Safe Haven
- Disabling Condition
- Domestic Violence
- Client Location (CoC)

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These data elements are required to be collected at project entry from all program participants served in CoC Program-funded projects. Project entry date is a critical data element, as all other data collected at project entry is then associated with this date. The other project status data elements define household relationships, and different aspects of housing status and history.  Disabling condition, as an overarching assessment, is required to be recorded at project entry for all persons served in Continuum projects. More specific information about disabling conditions is also presented on the next slide. Domestic violence and client location must also be collected at project entry, and updated if there are changes in the these elements at some point after entry. Client location, meaning the CoC in which the program participant is served, is only applicable if your project participates in an HMIS that is used by multiple CoCs or if you are serving a client who is in a different CoC than the CoC your project uses for HMIS data collection.

On the next slide, we will talk about several additional data elements that also need to be collected at project entry, but they are slightly different because they are required to be updated at later points of time.

**Stages 2: Project Entry (cont'd)**

- Disability information
  - Physical disability
  - Developmental disability
  - Substance Abuse
  - Mental Health problem
- Income and Sources
- Non-Cash Benefits
- Health Insurance

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This slide shows the other data elements that are required to be collected at project entry from all program participants served in CoC Program-funded projects. These data elements are used to track changes in family and personal circumstances over time. The data elements related to disability information must be collected at project entry, project exit, and update, if additional information is identified in between.

The data elements related to income and sources, non-cash benefits, and health insurance must be collected at project entry, as part of an annual assessment, at project exit, and if changes to income are identified in between.

Stage 3: Updates

- Updated information to any of the HMIS data elements should be entered into HMIS at the time of update
- Examples of potentially common updates include:
  - Disability
  - Income and sources
  - Non-cash benefits
  - Client location

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As noted previously, when information changes after project entry, you should "update" it in the HMIS at the time you learn about the new information. The updated values are saved in the system distinctly, so the original value will remain. Common updates that may be needed mid-year include changes to a program participant's disability, amount and sources of cash income received, and non-cash benefits received.

**Stage 4: Annual Assessment**

- Income and sources
- Non-cash benefits
- Health insurance

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If a household is enrolled in your project for more than one year, then you must update the information on income (amount and sources), non-cash benefits, and whether the household has health insurance, every year within 30 days of the anniversary of the program participant's project entry date. When this information is recorded, it has to be explicitly noted as the "annual assessment" update, so these values can be used to generate the annual performance report.  Please note that the updated value needs to be entered into the HMIS even if there has been no change in the value since project entry or the time of the last update.

Stage 5: Project Exit

- Project Exit Date
- Destination
- Disability Information
- Income and sources
- Non-cash benefits

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Two elements listed on this slide (Project Exit Date and Destination) are only required of program participants at project exit.  Information on income, non-cash benefits and disability must be recorded again at project exit, even if there has been no change in the information since project entry or the time of the last update. If you skip any of these data elements at project exit, they will show up as missing on the Annual Performance Report, which will reflect poorly on your grant performance.

One additional data element is not listed on the screen, "Housing Assessment at Exit." This data element is only required of Homelessness Prevention projects funded under the CoC Program, since homeless prevention has not been funded in FY2013 competition.

Significant Changes in 2014

- Client Location (new)
- Relationship to HoH (new)
- Length of time on Street, in ES/SH (new)
- Housing Status (change/demoted)
- Destination (change/promoted)
- Health Insurance (new)
- Residential Move-In Date

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This slide summarizes a few of the key changes in the 2014 HMIS Data Standards:

Client Location: This is a new data element.

Relationship to HoH: This is also a new data element.

Length of time on Street, in ES/SH (new): This data element is also new, and will assist in determining which clients meet the HUD definition of chronic homelessness.

Housing Status (change/demoted): This was revised to relate to each of the 4 categories of homelessness (per the HUD definition).  Only projects in CoCs approved by HUD to serve people homeless according to Category 3 are required to collect housing status.

Destination (change/promoted): This is now a universal data element.

Health Insurance (new): This is a new data element.

Residential Move-In Date: This is also a new data element.  It's only required of RRH projects.

Note that not all of the HMIS data elements are required of all program components.

The data elements listed on this slide are NOT required of all CoC Program components.

"Date of Contact" and "Date of Engagement" are only required of Supportive Services Only projects that are funded to provide Street Outreach.

"Residential Move-in Date" is only required of Permanent Housing: Rapid Re-housing projects.

Please note that there are several more data elements listed in the 2014 HMIS Data Standards that are not required for CoC Program-funded projects, but you may be asked to report on them if you receive funding from other federal funders such as the VA or HHS.

Additionally, a local CoC may opt to collect more data than is required by HUD.  Please be sure that you are speaking directly with your local CoC and its HMIS System Administrator to confirm if there are any additional local data collection requirements that apply to your project.

**Next Steps for Projects**

1. Speak to your HMIS System Administrator
2. Meet with staff to review data collection stages and data elements
3. Ensure a common understanding of data elements and a common agency practice for collecting and entering data for each stage of data collection
4. Update data collection forms and procedures

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So what can you do now to ensure that you're collecting the correct data in HMIS and doing so during the right stage or stages of data collection?

1- Speak to your HMIS System Administrator to be sure you understand the local plan for implementing the revised 2014 HMIS Data Standards

2-Meet with staff and review the information presented today. Regardless of whether or not your agency is new to HMIS or has been entering data for several years, you should never assume that all staff are aware of and are following HUDs expectations and requirements.

3- Make sure that staff collecting data from clients and entering data in HMIS are aware of the changes and are clear on what each data element and response category means.

4- Ensure that intake, update, annual assessment, and exit data collection forms include all HMIS data elements required for your project.

Remember, CoC Program-funded projects must begin collecting and entering data in your local HMIS according to the 2014 HMIS data standards no later than October 1, 2014.

This Manual is intended to serve as a reference and provide basic guidance on HMIS data elements for CoCs, HMIS Lead Agencies, HMIS System Administrators, and users.

Additionally, training materials and sample data collection forms will be available on the HUDexchange.info website

**FOR TEXT FIELDS, USE BLOCK LETTERS. OTHERWISE, MARK APPROPRIATE BOXES WITH AN "X"**
The form is broken into two sections for *All Clients*, and *Head of Household and Other Adults in the Household* in order to eliminate duplication of data gathering when characteristics apply to certain members of households.

## DATA FOR ALL CLIENTS

Respond to the following questions for all household members—each adult and child. A separate form should be included for each household member.

### PROJECT ENTRY DATE (e.g., 08/24/2014)

The Project Entry Date will serve as the information date for all data elements collected on this form; all data must be accurate as of this date, regardless of the date collected.

|  |  | / |  | / |  |  |  |  |
|---|---|---|---|---|---|---|---|---|
| Month | | Day | | | Year | | | |

### NAME (first, middle, last name, suffix (e.g., Jr, Sr, III))

| First name |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Middle name | | | | | | | | | | | | | | | |
| Last name | | | | | | | | | | | | | | | |
| Suffix | | | | | | | | | | | | | | | |

### NAME DATA QUALITY

☐ Full name reported

☐ Partial, street name, or code name reported

☐ Client doesn't know

☐ Client refused

### SOCIAL SECURITY NUMBER

|  |  |  | - |  |  | - |  |  |  |  |
|---|---|---|---|---|---|---|---|---|---|---|

### DATE OF BIRTH (e.g., 10/23/1978)

|  |  | / |  | / |  |  |  |  |
|---|---|---|---|---|---|---|---|---|
| Month | | Day | | | Year | | | |

### SOCIAL SECURITY NUMBER DATA QUALITY

☐ Full SSN reported

☐ Approximate or partial SSN reported

☐ Client doesn't know

☐ Client refused

### DATE OF BIRTH TYPE

☐ Full date of birth reported

☐ Approximate or partial date of birth reported

☐ Client doesn't know

☐ Client refused

# DATA FOR ALL CLIENTS (CONTINUED)

## RELATIONSHIP TO HEAD OF HOUSEHOLD

☐ Self (head of household)

☐ Head of household's child

☐ Head of household's spouse or partner

☐ Head of household's other relation member (other relation to head of household)

☐ Other: non-relation member

## RACE

More than one race is permitted. *Client doesn't know* and *Client refused* should only be selected if no other response is selected.

☐ American Indian or Alaska Native

☐ Asian

☐ Black or African American

☐ Native Hawaiian or Other Pacific Islander

☐ White

☐ Client doesn't know

☐ Client refused

## ETHNICITY

☐ Non-Hispanic / Non-Latino

☐ Hispanic / Latino

☐ Client doesn't know

☐ Client refused

## GENDER

☐ Female

☐ Male

☐ Transgender male to female

☐ Transgender female to male

☐ Other_____

☐ Client doesn't know

☐ Client refused

# DATA FOR ALL CLIENTS (CONTINUED)

## HEALTH INSURANCE

**Is the client currently covered by health insurance?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

⬇

**[IF YES] Answer 'Yes' or 'No' for each health insurance source.**

Answer 'No' for sources that have been terminated, even if they were received in the past.

| No | Yes | Source of non-cash benefit |
|---|---|---|
| ☐ | ☐ | Medicaid |
| ☐ | ☐ | Medicare |
| ☐ | ☐ | State Children's Health Insurance Program (or use local name) |
| ☐ | ☐ | Veteran's Administration (VA) Medical Services |
| ☐ | ☐ | Employer-Provided Health Insurance |
| ☐ | ☐ | Health insurance obtained through COBRA |
| ☐ | ☐ | Private Pay Health Insurance |
| ☐ | ☐ | State Health Insurance for Adults (or use local name) |

## PHYSICAL DISABILITY

**Does the client currently have a physical disability?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

⬇

**[IF YES for physical disability] Is the physical disability expected to be of long-continued and indefinite duration and substantially impair the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for physical disability]  Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for physical disability]  Is the client currently receiving services/treatment for this disability?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

# DATA FOR ALL CLIENTS (CONTINUED)

## DEVELOPMENTAL DISABILITY

**Does the client currently have a developmental disability?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES for developmental disability] Is the developmental disability expected to substantially impair the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for developmental disability] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for developmental disability] Is the client currently receiving services/treatment for this disability?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

## CHRONIC HEALTH CONDITION

**Does the client currently have a chronic health condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES for chronic health condition] Is the chronic health condition expected to be of long-continued and indefinite duration and substantially impair the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for chronic health condition] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for chronic health condition] Is the client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

# DATA FOR ALL CLIENTS (CONTINUED)

**HIV/AIDS**

**Does the client currently have HIV/AIDS?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

↓

**[IF YES for HIV/AIDS]  Is HIV/AIDS expected to substantially impair the client's ability to live independently?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

**[IF YES for HIV/AIDS] Is documentation of the disability and severity on file?**

☐ No

☐ Yes

**[IF YES for HIV/AIDS] Is the client currently receiving services/treatment for this condition?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

**MENTAL HEALTH PROBLEM**

**Does the client currently have a mental health problem?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

↓

**[IF YES for mental health problem] Is the mental health problem expected to be of long-continued and indefinite duration and substantially impairs the client's ability to live independently?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

**[IF YES for mental health problem] Is documentation of the disability and severity on file?**

☐ No

☐ Yes

**[IF YES for mental health problem] Is the client currently receiving services/treatment for this condition?**

☐ No ☐ Client doesn't know

☐ Yes ☐ Client refused

# DATA FOR ALL CLIENTS (CONTINUED)

**SUBSTANCE ABUSE PROBLEM**

**Does the client currently have a substance abuse problem?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Both alcohol and drug abuse |
| ☐ | Alcohol abuse | ☐ | Client doesn't know |
| ☐ | Drug abuse | ☐ | Client refused |

↓

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is the substance abuse problem expected to be of long-continued and indefinite duration and substantially impairs client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

## DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS

Respond to the following questions for the head of household and each additional adult in the household. If the household is composed of an unaccompanied child, that child is the head of household. If the household is composed of two or more minors, data must be collected about the minor that has been designated as the head of household. A separate form should be included for each adult member of the household.

### HOUSING STATUS

Housing status is only required to be collected by CoC Program-funded projects in those CoCs that are approved by HUD to serve clients who meet the definition of Homeless under Category 3 (homeless under other federal statutes). CoCs without the approval to serve clients who are homeless under Category 3 may still opt to have projects collect the Housing Status data element, but are not required to do so by HUD.

| | | | |
|---|---|---|---|
| ☐ | Category 1 – Homeless | ☐ | At-risk of homelessness* |
| ☐ | Category 2 – At imminent risk of losing housing | ☐ | Stably housed |
| ☐ | Category 3 – Homeless only under other federal statutes | ☐ | Client doesn't know |
| ☐ | Category 4 – Fleeing domestic violence | ☐ | Client refused |

*At project entry, the category of At-risk of homelessness is only a valid response for clients being served by Homelessness Prevention or Coordinated Assessment projects.*

### LENGTH OF TIME ON STREET, IN AN EMERGENCY SHELTER, OR SAFE HAVEN  Has the client been continuously homeless (i.e., on the street, in an emergency shelter, or safe haven) for at least one year?

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

### Number of times the client has been homeless (i.e., on the street, in an emergency shelter, or safe haven) in the past three years

Note that only CoCs designated as High Performing Communities can use CoC Program funds to serve clients with a response of 0. HUD has not yet designated any High Performing Communities.

| | | | |
|---|---|---|---|
| ☐ | 0 (not homeless – Prevention only) | ☐ | Client doesn't know |
| ☐ | 1 (homeless only this time) | ☐ | Client refused |
| ☐ | 2 | | |
| ☐ | 3 | | |
| ☐ | 4 or more | | |

⬇

**[IF '4 or more'] Total number of months homeless (i.e., on the street, in an emergency shelter, or safe haven)  in the past three years**

| | |
|---|---|
| ☐ | If 0-12 months, specify #:_____ |
| ☐ | More than 12 months |
| ☐ | Client doesn't know |
| ☐ | Client refused |

**Total number of months <u>continuously</u> homeless** (i.e., on the street, in an emergency shelter, or safe haven) **immediately prior to project entry**

[integer] _____

### Status documented?

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

Data for Head of household and other Adults (continued)

**VETERAN STATUS**

Veteran Status is only collected on heads of household who are 18 years of age and older, as well as all other adults in the household.

- ☐ No
- ☐ Yes
- ☐ Client doesn't know
- ☐ Client refused

**DISABLING CONDITION**

- ☐ No
- ☐ Yes
- ☐ Client doesn't know
- ☐ Client refused

**RESIDENCE PRIOR TO PROJECT ENTRY**

- ☐ Emergency shelter, including hotel or motel paid for with emergency shelter voucher
- ☐ Foster care home or foster care group home
- ☐ Hospital or other residential non-psychiatric medical facility
- ☐ Hotel or motel paid for without emergency shelter voucher
- ☐ Jail, prison, or juvenile detention facility
- ☐ Long-term care facility or nursing home
- ☐ Owned by client, no ongoing housing subsidy
- ☐ Owned by client, with ongoing housing subsidy
- ☐ Permanent housing for formerly homeless persons (such as CoC project; HUD legacy programs; or HOPWA PH)
- ☐ Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)
- ☐ Psychiatric hospital or other psychiatric facility
- ☐ Rental by client, no ongoing housing subsidy

- ☐ Rental by client, with VASH subsidy
- ☐ Rental by client, with GPD TIP subsidy
- ☐ Rental by client, with other ongoing housing subsidy
- ☐ Residential project or halfway house with no homeless criteria
- ☐ Safe Haven
- ☐ Staying or living in a family member's room, apartment, or house
- ☐ Staying or living in a friend's room, apartment, or house
- ☐ Substance abuse treatment facility or detox center
- ☐ Transitional housing for homeless persons (including homeless youth)
- ☐ Other: (Describe) _____
- ☐ Client doesn't know
- ☐ Client refused

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

## LENGTH OF STAY IN PREVIOUS PLACE

☐ One day or less

☐ Two days to one week

☐ More than one week, but less than one month

☐ One to three months

☐ More than three months, but less than one year

☐ One year or longer

☐ Client doesn't know

☐ Client refused

## DOMESTIC VIOLENCE

**Is client a domestic violence victim/survivor?**

☐ No

☐ Yes

☐ Client doesn't know

☐ Client refused

⬇

### [IF YES] When did the experience occur?

☐ Within the past three months

☐ Three to six months ago (excluding six months exactly)

☐ Six months to one year ago (excluding one year exactly)

☐ One year ago or more

☐ Client doesn't know

☐ Client refused

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

## INCOME AND SOURCES

**Income from any source?**

| | |
|---|---|
| ☐ No | ☐ Client doesn't know |
| ☐ Yes | ☐ Client refused |

↓

**[IF YES] Answer Yes or No for each income source. If the response for a source is 'Yes', enter the monthly amount received based on current income. If unsure of the exact monthly amount, enter client's best estimate.**

| Source of income | Receiving income from source? | | If yes, monthly amount from source (round to nearest dollar) | | | |
|---|---|---|---|---|---|---|
| Earned income (i.e., employment income) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Unemployment Insurance | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Supplemental Security Income (SSI) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Social Security Disability Income (SSDI) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| VA Service-Connected Disability Compensation | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| VA Non-Service-Connected Disability Pension | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Private disability insurance | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Worker's Compensation | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Temporary Assistance for Needy Families (TANF) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| General Assistance (GA) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Retirement Income from Social Security | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Pension or retirement income from a former job | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Child support | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Alimony or other spousal support | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Other source    If yes, specify | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| **Total monthly income** | **Monthly income from all sources** | | $ | | | . 0 0 |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

**NON-CASH BENEFITS**

**Non-cash benefits from any source?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

⬇

**[IF YES] Answer 'Yes' or 'No' for each non-cash benefit source. (Answer 'No' for benefits that have been terminated, even if they were received in the past.)**

| No | Yes | Source of non-cash benefit |
|---|---|---|
| ☐ | ☐ | Supplemental Nutrition Assistance Program (SNAP) |
| ☐ | ☐ | Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) |
| ☐ | ☐ | TANF Child Care services *(or use local name)* |
| ☐ | ☐ | TANF transportation services *(or use local name)* |
| ☐ | ☐ | Other TANF-Funded Services *(or use local name)* |
| ☐ | ☐ | Section 8, Public Housing, or other ongoing rental assistance |
| ☐ | ☐ | Temporary rental assistance |
| ☐ | ☐ | Other source: _____ |

**FOR TEXT FIELDS, USE BLOCK LETTERS. OTHERWISE, MARK APPROPRIATE BOXES WITH AN "X"**
The form is broken into two sections for *All Clients*, and *Head of Household and Other Adults in the Household* in order to eliminate duplication of data gathering when characteristics only apply to certain members of households.

## DATA FOR ALL CLIENTS

Respond to the following questions for all household members—each adult and child. A separate form should be included for each household member.

**ASESSMENT DATE (e.g., 08/24/2014)**
The Assessment Date will serve as the information date for all data elements collected on this form; all data must be accurate as of this date, regardless of the date collected.

| | | / | | / | | | |
|---|---|---|---|---|---|---|---|

Month　　　　Day　　　　Year

**CLIENT** (name or other identifier)

**HEALTH INSURANCE**

**Is the client currently covered by health insurance?**

| | | | | |
|---|---|---|---|---|
| ☐ | No | | ☐ | Client doesn't know |
| ☐ | Yes | | ☐ | Client refused |

⬇

**[IF YES] Answer 'Yes' or 'No' for each health insurance source.**

Answer 'No' for sources that have been terminated, even if they were received in the past.

| No | Yes | Source of non-cash benefit |
|---|---|---|
| ☐ | ☐ | Medicaid |
| ☐ | ☐ | Medicare |
| ☐ | ☐ | State Children's Health Insurance Program (or use local name) |
| ☐ | ☐ | Veteran's Administration (VA) Medical Services |
| ☐ | ☐ | Employer-Provided Health Insurance |
| ☐ | ☐ | Health insurance obtained through COBRA |
| ☐ | ☐ | Private Pay Health Insurance |
| ☐ | ☐ | State Health Insurance for Adults (or use local name) |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS

Respond to the following questions for the head of household and each additional adult in the household. If the household is composed of an unaccompanied child, that child is the head of household. If the household is composed of two or more minors, data must be collected about the minor that has been designated as the head of household. A separate form should be included for each adult member of the household.

## INCOME AND SOURCES Income from any source?

☐ No

☐ Yes

☐ Client doesn't know

☐ Client refused

↓

**[IF YES] Answer Yes or No for each income source. If the response for a source is 'Yes', enter the monthly amount received based on current income. If unsure of the exact monthly amount, enter client's best estimate.**

| Source of income | Receiving income from source? | | If yes, monthly amount from source (round to nearest dollar) | | | |
|---|---|---|---|---|---|---|
| Earned income (i.e., employment income) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Unemployment Insurance | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Supplemental Security Income (SSI) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Social Security Disability Income (SSDI) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| VA Service-Connected Disability Compensation | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| VA Non-Service-Connected Disability Pension | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Private disability insurance | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Worker's Compensation | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Temporary Assistance for Needy Families (TANF) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| General Assistance (GA) | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Retirement Income from Social Security | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Pension or retirement income from a former job | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Child support | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Alimony or other spousal support | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| Other source  If yes, specify | No | ☐ | | | | |
| | Yes | ☐ | $ | | | . 0 0 |
| **Total monthly income** | **Monthly income from all sources** | | $ | | | . 0 0 |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

## NON-CASH BENEFITS

**Non-cash benefits from any source?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES] Answer 'Yes' or 'No' for each non-cash benefit source. (Answer 'No' for benefits that have been terminated, even if they were received in the past.)**

| No | Yes | Source of non-cash benefit |
|----|-----|----------------------------|
| ☐ | ☐ | Supplemental Nutrition Assistance Program (SNAP) |
| ☐ | ☐ | Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) |
| ☐ | ☐ | TANF Child Care services *(or use local name)* |
| ☐ | ☐ | TANF transportation services *(or use local name)* |
| ☐ | ☐ | Other TANF-Funded Services *(or use local name)* |
| ☐ | ☐ | Section 8, Public Housing, or other ongoing rental assistance |
| ☐ | ☐ | Temporary rental assistance |
| ☐ | ☐ | Other source: _____ |

**FOR TEXT FIELDS, USE BLOCK LETTERS. OTHERWISE, MARK APPROPRIATE BOXES WITH AN "X"**
The form is broken into two sections for *All Clients* and *Head of Household and Other Adults in the Household* in order to eliminate duplication of data gathering when characteristics only apply to certain members of households.

## DATA FOR ALL CLIENTS

Respond to the following questions for all household members—each adult and child. A separate form should be included for each household member.

### PROJECT EXIT DATE (e.g., 08/24/2014)

The Project Exit Date will serve as the information date for all data elements collected on this form; all data must be accurate as of this date, regardless of the date collected.

| | | / | | / | | | | |
|---|---|---|---|---|---|---|---|---|

Month          Day          Year

### CLIENT (name or other identifier)

| |
|---|

### HEALTH INSURANCE

**Is the client currently covered by health insurance?**

| ☐ | No | | ☐ | Client doesn't know |
|---|---|---|---|---|
| ☐ | Yes | | ☐ | Client refused |

⬇

**[IF YES] Answer 'Yes' or 'No' for each health insurance source.**

Answer 'No' for sources that have been terminated, even if they were received in the past.

| No | Yes | Source of non-cash benefit |
|---|---|---|
| ☐ | ☐ | Medicaid |
| ☐ | ☐ | Medicare |
| ☐ | ☐ | State Children's Health Insurance Program (or use local name) |
| ☐ | ☐ | Veteran's Administration (VA) Medical Services |
| ☐ | ☐ | Employer-Provided Health Insurance |
| ☐ | ☐ | Health insurance obtained through COBRA |
| ☐ | ☐ | Private Pay Health Insurance |
| ☐ | ☐ | State Health Insurance for Adults (or use local name) |

# DATA FOR ALL CLIENTS (CONTINUED)

## PHYSICAL DISABILITY

**Does the client currently have a physical disability?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

↓

**[IF YES for physical disability] Is the physical disability expected to be of long-continued and indefinite duration and substantially impair the client's ability to live independently?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

**[IF YES for physical disability]  Is documentation of the disability and severity on file?**

☐ No

☐ Yes

**[IF YES for physical disability]  Is the client currently receiving services/treatment for this disability?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

## DEVELOPMENTAL DISABILITY

**Does the client currently have a developmental disability?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

↓

**[IF YES for developmental disability] Is the developmental disability expected to substantially impair the client's ability to live independently?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

**[IF YES for developmental disability] Is documentation of the disability and severity on file?**

☐ No

☐ Yes

**[IF YES for developmental disability] Is the client currently receiving services/treatment for this disability?**

☐ No                                    ☐ Client doesn't know

☐ Yes                                   ☐ Client refused

# DATA FOR ALL CLIENTS (CONTINUED)

**CHRONIC HEALTH CONDITION**

**Does the client currently have a chronic health condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES for chronic health condition]  Is the chronic health condition expected to be of long-continued and indefinite duration and substantially impair the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for chronic health condition] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for chronic health condition] Is the client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**HIV/AIDS**

**Does the client currently have HIV/AIDS?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES for HIV/AIDS]  Is HIV/AIDS expected to substantially impair the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for HIV/AIDS] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for HIV/AIDS] Is the client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

# DATA FOR ALL CLIENTS (CONTINUED)

## MENTAL HEALTH PROBLEM

**Does the client currently have a mental health problem?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**↓**

**[IF YES for mental health problem] Is the mental health problem expected to be of long-continued and indefinite duration and substantially impairs the client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for mental health problem] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for mental health problem] Is the client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

## SUBSTANCE ABUSE PROBLEM

**Does the client currently have a substance abuse problem?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Both alcohol and drug abuse |
| ☐ | Alcohol abuse | ☐ | Client doesn't know |
| ☐ | Drug abuse | ☐ | Client refused |

**↓**

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is the substance abuse problem expected to be of long-continued and indefinite duration and substantially impairs client's ability to live independently?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is documentation of the disability and severity on file?**

| | |
|---|---|
| ☐ | No |
| ☐ | Yes |

**[IF YES for alcohol abuse, drug abuse, or both alcohol and drug abuse for substance abuse problem] Is client currently receiving services/treatment for this condition?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS

Respond to the following questions for the head of household and each additional adult in the household. If the household is composed of an unaccompanied child, that child is the head of household. If the household is composed of two or more minors, data must be collected about the minor that has been designated as the head of household. A separate form should be included for each adult member of the household.

## DESTINATION

| | | | |
|---|---|---|---|
| ☐ | Deceased | ☐ | Rental by client, no ongoing housing subsidy |
| ☐ | Emergency shelter, including hotel or motel paid for with emergency shelter voucher | ☐ | Rental by client, with VASH housing subsidy |
| ☐ | Foster care home or foster care group home | ☐ | Rental by client, with GPD TIP housing subsidy |
| ☐ | Hospital or other residential non-psychiatric medical facility | ☐ | Rental by client, with other ongoing housing subsidy |
| ☐ | Hotel or motel paid for without emergency shelter voucher | ☐ | Safe Haven |
| ☐ | Jail, prison, or juvenile detention facility | ☐ | Staying or living with family, permanent tenure |
| ☐ | Long-term care facility or nursing home | ☐ | Staying or living with family, temporary tenure (e.g., room, apartment or house) |
| ☐ | Moved from one HOPWA funded project to HOPWA PH | ☐ | Staying or living with friends, permanent tenure |
| ☐ | Moved from one HOPWA funded project to HOPWA TH | ☐ | Staying or living with friends, temporary tenure (e.g., room apartment or house) |
| ☐ | Owned by client, no ongoing housing subsidy | ☐ | Substance abuse treatment facility or detox center |
| ☐ | Owned by client, with ongoing housing subsidy | ☐ | Transitional housing for homeless persons (including homeless youth) |
| ☐ | Permanent housing for formerly homeless persons (such as CoC project; or HUD legacy program; or HOPWA PH) | ☐ | Other (Describe) _____ |
| ☐ | Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside) | ☐ | No exit interview completed |
| ☐ | Psychiatric hospital or other psychiatric facility | ☐ | Client doesn't know |
| | | ☐ | Client refused |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

**INCOME AND SOURCES**

**Income from any source?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES] Answer Yes or No for each income source. If the response for a source is 'Yes', enter the monthly amount received based on current income. If unsure of the exact monthly amount, enter client's best estimate.**

| Source of income | Receiving income from source? | | If yes, monthly amount from source (round to nearest dollar) |
|---|---|---|---|
| Earned income (i.e., employment income) | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Unemployment Insurance | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Supplemental Security Income (SSI) | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Social Security Disability Income (SSDI) | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| VA Service-Connected Disability Compensation | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| VA Non-Service-Connected Disability Pension | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Private disability insurance | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Worker's Compensation | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Temporary Assistance for Needy Families (TANF) | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| General Assistance (GA) | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Retirement Income from Social Security | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Pension or retirement income from a former job | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Child support | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Alimony or other spousal support | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| Other source     If yes, specify | No | ☐ | |
| | Yes | ☐ | $ . 0 0 |
| **Total monthly income** | **Monthly income from all sources** | | $ . 0 0 |

# DATA FOR HEAD OF HOUSEHOLD AND OTHER ADULTS (CONTINUED)

**NON-CASH BENEFITS**

**Non-cash benefits from any source?**

| | | | |
|---|---|---|---|
| ☐ | No | ☐ | Client doesn't know |
| ☐ | Yes | ☐ | Client refused |

↓

**[IF YES] Answer 'Yes' or 'No' for each non-cash benefit source.  (Answer 'No' for benefits that have been terminated, even if they were received in the past.)**

| No | Yes | Source of non-cash benefit |
|---|---|---|
| ☐ | ☐ | Supplemental Nutrition Assistance Program (SNAP) |
| ☐ | ☐ | Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) |
| ☐ | ☐ | TANF Child Care services *(or use local name)* |
| ☐ | ☐ | TANF transportation services *(or use local name)* |
| ☐ | ☐ | Other TANF-Funded Services *(or use local name)* |
| ☐ | ☐ | Section 8, Public Housing, or other ongoing rental assistance |
| ☐ | ☐ | Temporary rental assistance |
| ☐ | ☐ | Other source: _____ |