|  |  |  |  |
| --- | --- | --- | --- |
| Guide for Review of CoC Rapid Rehousing Requirements | | | |
| **Name of Recipient:** | | | |
| **Name of Subrecipient(s):** | | | |
| **Grant Number:** | | | |
| **Project Name:** | | | |
| **Staff Consulted:** | | | |
| **Name(s) of Reviewer(s)** |  | **Date** |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must select “NO” in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to assess the recipient’s compliance with the Rapid Rehousing program component of the Continuum of Care (CoC) Program. Rapid rehousing is a form of permanent housing that is short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in 24 CFR 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. Each project still has to not only follow the CoC program rules, but also the rules under the Notice of Funds Availability (NOFA) under which it was awarded. This Exhibit should be used in conjunction with all other Exhibits relevant to the project being monitored. The Exhibit is divided into three sections: Homeless Status and Eligibility Determination; Component-Specific Requirements; and Eligible Costs.

**Questions:**

A. HOMELESS STATUS AND ELIGIBILITY DETERMINATION

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient determine whether program participants’ eligibility was adequately documented in terms of their homeless status upon entry into the program?  NOTE: The HUD reviewer MUST complete Exhibit 29-1, *Guide for Review of Homeless and At-Risk Determination/Recordkeeping Requirements*, to answer this question.  [24 CFR 578.103] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to assess the participants to ensure eligibility criteria established by NOFA in the year of original award (e.g., the household was residing in a place not fit for human habitation, in an emergency shelter, or fulfilled the criteria for chronic homelessness) was met?  [NOFA for FY 2014 or FY 2013-2014; 24 CFR 578.103(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. COMPONENT-SPECIFIC REQUIREMENTS

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did program participants who were receiving rapid re-housing assistance have a signed lease agreement of at least 1 year that was renewable (for a minimum term of 1 month) and terminable only for cause?  [Definition of permanent housing in 24 CFR 578.3; 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the CoC establish a system for prioritizing persons for RRH?  b. If so, did the recipient and its subrecipients comply with the written policies and procedures established by the CoC for determining and prioritizing which families and individuals would receive rapid rehousing assistance?  c. Did the recipient and its subrecipients comply with the written policies established by the CoC on the amount (or percentage) of rent that each program participant must pay?  [24 CFR 578.37(a)(1)(ii)(A); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to expend grants funds for only supportive services, tenant-based rental assistance, administration, or relocation, and only if the grant agreement provided funds for those costs?  [24 CFR 578.37(a)(1)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to provide tenant-based rental assistance that did not exceed 24 months per household?  [24 CFR 578.37(a)(1)(ii)(C); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement that program participants receive supportive services for no more than 6 months after rental assistance ended?  [24 CFR 578.37(a)(1)(ii)(D); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the program participants re-evaluated not less than once annually to determine if they lacked sufficient resources and support networks to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing?  [24 CFR 578.37(a)(1)(ii)(E); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project require participants to meet with a case manager at least once per month to assist the participant in ensuring long-term housing stability?  NOTE: Mark “N/A” if the project is exempt from this requirement of the Violence Against Women Reauthorization Act of 2013 or the Family Violence Prevention and Services Act, which prohibits a recipient/ subrecipient from making housing conditional on the program participant’s acceptance of services.  [24 CFR 578.37(a)(1)(ii)(F); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. ELIGIBLE COSTS

Rental Assistance

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Rental Assistance?  NOTE: If the response is “No,” do not complete questions 11-18. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the documentation show that grant funds were not expended for rental assistance provided to a program participant who was already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, state, or local sources?  [24 CFR 578.51(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for rental assistance only for some or all of the following eligible costs, or the staff and overhead costs directly related to carrying out these eligible costs: rental assistance, administering rental assistance, security deposits, first/last months’ rent, and vacancy payments?  [24 CFR 578.51(a)(2); 24 CFR 578.51(b); 24 CFR 578.51(h)(4)(i); 24 CFR578.51(j); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were program participants allowed to choose housing of an appropriate size in which to reside?  [24 CFR 578.51(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If program participants were required to live in a specific area for their entire period of participation, or in a specific structure for the first year and in a specific area for the remainder of their period of participation, do documents establish that the restriction to a structure or area is necessary?  [24 CFR 578.51(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did a household that was assisted with tenant-based rental assistance move outside of the geographic area for the household’s health and safety based on the household’s reasonable belief that they were imminently threatened for further domestic violence, dating violence, sexual assault, or stalking ?  b. If so, do records document that the household complied with all program requirements during their residency and were at imminent risk of further harm?  [24 CFR 578.51(c)(3); 24 CFR 578.103(a)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For rental assistance paid, did the recipient or its subrecipients determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units?  NOTE: Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.  [24 CFR 578.51(g); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If an assisted unit was vacated before the expiration of the lease, did the recipient/subrecipient pay rental assistance for vacancies for no more than 30 days from the end of the month in which the unit was vacated?  NOTE: Brief periods of stays in institutions (not to exceed 90 days) by program participants are not considered “vacancies” and the recipient/subrecipient may continue to pay rent on the unit while the program participant is in the institution.  [24 CFR 578.51(i); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In instances where grant funds were expended for rental assistance, were lease agreements in place between the program participant and the landlord/landowner?  [24 CFR 578.51; 42 U.S.C. 11304; 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Supportive Services

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Supportive Services?  NOTE: If the response is “No,” do not complete questions 20-23. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If supportive services were provided in a facility not contained in a housing structure, were funds expended only on costs classified as day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities and equipment as supportive services costs?  [24 CFR 578.53(a); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were supportive services paid for with grant funds necessary to assist program participants to obtain and maintain housing?  [24 CFR 578.53(a)(1); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to conduct an annual assessment of the service needs of all program participants and adjusted services as necessary?  [24 CFR 578.53(a)(2); 24 CFR 578.103(a)(7)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |
| --- | --- |
| If the project description in the approved grant application shows that the recipient would provide the particular type of supportive service listed below, were the grant funds expended for the costs of supportive services limited to the listed costs, including the staff and overhead costs directly related to carrying out the costs of: | |
| 1. One-time moving costs?   NOTE: Truck rental and hiring a moving company are eligible costs.  [24 CFR 578.53(e)(2); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Case management?   [24 CFR 578.53(e)(3); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Child care?   [24 CFR 578.53(e)(4); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Education services?   [24 CFR 578.53(e)(5); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Employment assistance and job training?   [24 CFR 578.53(e)(6); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Food?   [24 CFR 578.53(e)(7); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Housing search and counseling services?   [24 CFR 578.53(e)(8); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Legal services?   [24 CFR 578.53(e)(9); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Life skills training?   [24 CFR 578.53(e)(10); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Mental health services provided by licensed professionals?   [24 CFR 578.53(e)(11); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Outpatient health services provided by licensed medical professionals?   [24 CFR 578.53(e)(12); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Outreach services?   [24 CFR 578.53(e)(13); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Substance abuse treatment?   NOTE: Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.  [24 CFR 578.53(e)(14); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Transportation: Costs of program participants’ travel on public transportation or in a vehicle provided by the recipient or its subrecipients to/from medical care, employment, child care, or other eligible supportive services?   [24 CFR 578.53(e)(15)(i); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Transportation: Costs of mileage allowance for service workers to visit program participants?   [24 CFR 578.53(e)(15)(ii); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Transportation: Costs of purchasing or leasing a vehicle in which staff transport program participants and/or staff serving program participants?   [24 CFR 578.53(e)(15)(iii); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Transportation: Costs of gas, insurance, taxes, and maintenance for a vehicle transporting staff serving program participants and/or staff serving program participants?   [24 CFR 578.53(e)(15)(iv); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Transportation: Costs of recipient and subrecipient staff to accompany or assist program participants to utilize public transportation?   [24 CFR 578.53(e)(15)(v); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Participant’s vehicle repairs: A one-time payment for car repairs or maintenance where public transportation did not exist or was insufficient?   [24 CFR 578.53(e)(15)(vi); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Participant’s vehicle repairs: Costs did not exceed 10 percent of the Blue Book value of the vehicle?   [24 CFR 578.53(e)(15)(vi)(A); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Participant’s vehicle repairs: Costs were paid by the recipient and its subrecipients directly to the third party that repairs or maintains the car?   [24 CFR 578.53(e)(15)(vi)(B); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Participant’s vehicle repairs: If recipient and its subrecipients required program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance, did the records document the program participant’s contribution?   [24 CFR 578.53(e)(15)(vi)(C); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Utility deposits: A one-time fee paid directly to the utility companies?   [24 CFR 578.53(e)(16); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Homeless Management Information System (HMIS)

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for HMIS costs?  NOTE: If the answer is “No,” do not complete questions 25-26. If the answer is “Yes,” the HUD reviewer MUST complete Exhibit 29-10, *Guide for Review of CoC Homeless Management Information System (HMIS) Requirements*, to answer questions 25-26. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient or its subrecipients are victim services providers, or legal services providers and if they used grant funds to establish and operate a comparable database, do the records confirm that the comparable database complies with HUD’s HMIS requirements?  [24 CFR 578.57(a)(3); 24 CFR 578.103(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for HMIS costs that comply with HMIS requirements published by HUD?  [24 CFR 578.57(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Project Administration

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were project administration funds expended only for the payment of project administration costs related to the planning and execution of CoC activities, including costs related to, and the staff and overhead costs directly related to, carrying out overall program management, coordination, monitoring, and evaluation; providing training on CoC program requirements and attending HUD-sponsored CoC trainings; and carrying out environmental reviews?  [24 CFR 578.59(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Relocation Costs

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the grant agreement include funding for the costs of complying with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970?  b. Were grant funds expended on relocation costs eligible under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970?  [24 CFR 578.61(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for eligible costs to provide relocation payments and other assistance to persons displaced by a project assisted with grant funds in accordance with 24 CFR 578.83?  [24 CFR 578.61(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |