|  |  |  |  |
| --- | --- | --- | --- |
| Guide for Review of CoC Safe Haven 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 eligible costs of the Continuum of Care (CoC) Program. 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 and document that the program participant eligibility criteria established by NOFA in the year of original award was met (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)?  [NOFA in which project was originally awarded] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. COMPONENT-SPECIFIC REQUIREMENTS

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to serve hard-to-reach homeless persons with severe mental illness who came from the streets or places not meant for human habitation and have been unwilling or unable to participate in supportive services?  [Definition of Safe Haven at 24 CFR 578.3; 24 CFR 578.103(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records document that the recipient and its subrecipients met the requirement to provide 24-hour residence for eligible persons for an unspecified period?  [24 CFR 578.3] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records document that the housing has an overnight capacity limited to 25 or fewer persons?  [24 CFR 578.3] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records document that the housing provides low-demand services and referrals for the residents?  [24 CFR 578.3] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. ELIGIBLE COSTS

Leasing

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Leasing?  NOTE: If the response is “No,” do not complete questions 8-15. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If grant funds were expended for leasing structures, were they used to provide supportive services to homeless persons or for the staff and overhead costs directly related to leasing structures or individual units to provide housing or supportive services to homeless persons?  [24 CFR 578.59(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where the recipient or its subrecipient(s) leased the structure, or portions thereof, and grant funds are used to pay the costs of leasing, do records document that the recipient provided housing or supportive services to homeless persons for no more than 3 years?  [24 CFR 578.49(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If grant funds were expended for leasing structures or individual housing units, and if the structures or units were owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, did HUD authorize an exception for good cause?  [24 CFR 578.49(a)(2); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing structures or units to provide housing or supportive services, was the rent paid reasonable in relation to rents being charged in the area for comparable space and did not exceed rents currently being charged by the same owner for comparable unassisted space?  NOTE: Where utilities are not included in the lease, and therefore not covered by leasing dollars, the recipient or its subrecipients must consider the cost of utilities when calculating whether the amount paid is reasonable.  [24 CFR 578.49(b)(1); 24 CFR 578.49(b)(2); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing individual units to provide housing or supportive services, did the recipient and its subrecipients limit payments to the HUD-determined fair market rents (FMRs)?  NOTE: Recipients/subrecipients may not use CoC Program funds or tenants rents to pay rents above FMR.  [24 CFR 578.49(b)(2); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing structures or units, did the recipient and its subrecipients not exceed 2 months of actual rent for a program participant’s security deposit or first/last months’ rent?  [24 CFR 578.49(b)(4); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing individual units, were there lease agreements in place between the recipient or its subrecipients and the landlord/landowner that supports the costs charged to the grant for leasing costs as required?  [24 CFR 578.49(b)(5); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to calculate occupancy charges or rent collected from program participants as required?  [24 CFR 578.49(b)(6); 24 CFR 578.103(a)(17); 24 CFR 578.77(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Supportive Services

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Supportive Services?  NOTE: If the response is “No,” do not complete questions 17-19. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the 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:** | |
|  | |

18.

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

19.

|  |  |
| --- | --- |
| 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. 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 and 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 transported 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 or 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 or its subrecipient 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 or 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:** | |
|  | |

Operating

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Operating costs?  NOTE: If response is “No,” do not complete questions 21-25. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for the costs of the day-to-day operation of housing in a single unit or structure, including the staff and overhead costs directly related to carrying out the day-to-day operation of permanent housing, including maintenance and repair of housing, property taxes and insurance, scheduled payments to a replacement reserve, building security, utilities (electricity, gas, and water), furniture, and equipment?  [24 CFR 578.55(a); 24 CFR 578.59(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If grant funds were expended on building security, do records document that that it was for a structure where more than 50 percent of the units or area was paid for with grant funds?  [24 CFR 578.55(b)(4); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds not used for the operating costs of an emergency shelter or supportive service-only facilities?  [24 CFR 578.55(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If operating costs were expended on the maintenance and repair of housing, do records confirm that the costs of maintaining and repairing the housing were not included in the lease (if a lease has been executed)?  [24 CFR 578.55(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If operating costs were expended on utilities for housing, do records document that the utilities were not included in the lease (if a lease was executed)?  [24 CFR 578.55(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Homeless Management Information System (HMIS)

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for HMIS costs?  NOTE: If the response is “No,” do not complete questions 27-28. 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 27-28. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 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 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:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records document grant funds expended for HMIS costs complied 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

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were project administration funds expended only for the payment of project administration costs related to the planning and execution of CoC activities, including costs for staff and overhead 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

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the grant agreement include funding for 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:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 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:** | |
|  | |