|  |  |  |  |
| --- | --- | --- | --- |
| Guide for Review of CoC Supportive Services-Only 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/subrecipient(s)’s compliance with the Supportive Services-Only (SSO) program component and eligible activities of the Continuum of Care (CoC) Program. The Exhibit is divided into four sections: Homeless Status and Eligibility Determination; Component-Specific Requirements; Eligible Costs; and Restrictions on Combining Costs.

**Questions:**

A. HOMELESS STATUS AND ELIGIBILITY DETERMINATION

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient/subrecipient(s) 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 or its subrecipients assess the participants to ensure eligibility criteria established by NOFA in the year of original award?  [NOFA; 24 CFR 578.103(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. COMPONENT-SPECIFIC REQUIREMENTS

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were supportive services being provided by a recipient or its subrecipients that did not also provide the housing or housing assistance for the program participants?  [24 CFR 578.37(a)(3); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. ELIGIBLE COSTS

Acquisition and Rehabilitation

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for Acquisition and Rehabilitation?  NOTE: If the response is “No,” do not complete questions 5-7. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds for acquiring real property used for the purpose of providing supporting services to homeless persons and for any staff and overhead costs directly related to carrying out the activity of acquiring real property?  [24 CFR 578.43; 24 CFR 578.59(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were all grant funds expended for the rehabilitation of structures expended for the eligible costs (including installation of cost-effective energy measures and bringing an existing structure upto state and local government health and safety standards) as well as any staff and overhead costs directly related to carrying out these costs?  [24 CFR 578.45(b); 24 CFR 578.59(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If grant funds were expended on rehabilitation, do the files reflect that the property was not leased property?  [24 CFR 578.45(c); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Leasing

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement contain funding for Leasing?  NOTE: If the response is “No,” do not complete questions 9-12. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 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 578.49(a); 24 CFR 578.59(a); 24 CFR 578.103] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

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

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing structures or units to provide supportive services to homeless persons, 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 were not included in the lease and, therefore, not covered by leasing dollars, the recipient and 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] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where grant funds were expended for leasing individual units to provide supportive services, did the recipient or its subrecipients exceed HUD-determined fair market rents (FMR)?  NOTE: Recipients and their subrecipients may use other funds (not CoC Program funds, including tenant rents) to pay rents that are above FMR so long as the rent is still reasonable.  [24 CFR 578.49(b)(2); 24 CFR 578.103] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Supportive Services

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If supportive services were provided in a facility not contained in a housing structure, were funds expended only for supportive service delivery and 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 578.59(a); 24 CFR 578.103(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

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

15.

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

16.

|  |  |
| --- | --- |
| 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/subrecipient(s) 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 transports 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?   [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 use 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/ 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:** | |
|  | |

Homeless Management Information System (HMIS)

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grant agreement include funding for HMIS costs?  NOTE: If the response is “No,” do not complete questions 18-19. If the response is “Yes,” the HUD reviewer MUST complete Exhibit 29-10, *Guide for Review of CoC Homeless Management Information System (HMIS)*, to answer questions 18-19. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

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

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for HMIS costs in compliance 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

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were project administration funds only expended 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

21.

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

22.

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

D. Restrictions on Combining Funds

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and its subrecipients meet the requirement to not combine grant funds for leasing and acquisition or rehabilitation in a single structure or housing unit?  NOTE: No funds may be used to rent units that have already received Acquisition, New Construction, or Rehabilitation from other CoC projects administered by themselves or another recipient/ subrecipient.  [24 CFR 578.87(c)(1); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |