|  |  |  |  |
| --- | --- | --- | --- |
| Guide for Review of CoC Recipient Overall Grant Management | | | |
| **Name of Recipient:** | | | |
| **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 overall administration of the recipient’s Continuum of Care (CoC) Program project(s). It is divided into nineteen sections: Overall Grant Management & Oversight; Homeless Management Information System (HMIS); Financial and Internal Controls; Match; Program Income; Limitation on Use of Funds; Termination of Assistance; Fair Housing and Equal Opportunity; Displacement, Relocation and Acquisition; Environmental Review; Program Oversight and Operations; Recordkeeping; Supportive Services; Drug-Free Workplace, Lobbying Restrictions; Conflict of Interest; Lead Hazard Abatement Requirements; Section 6002 of the Solid Waste Disposal Act, and Transparency Act Reporting. For recipients engaged in procurement, use Exhibit 29-13, *Guide for Review of CoC Procurement Requirements*, must be completed.

**Questions:**

A. OVERALL GRANT MANAGEMENT & OVERSIGHT

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the recipient established and maintained standard operating procedures to ensure that CoC Program funds are used in accordance with the provisions of the McKinney-Vento Act?  [24 CFR 578.103(a)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records document that the recipient monitored its subrecipients and reported the progress of the project(s) to the CoC and HUD?  [24 CFR 578.23(c)(2); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |
| --- | --- |
| Did the recipient collect the following certifications of its subrecipients: | |
| 1. maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project?   [24 CFR 578.23(c)(4)(i); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. the address or location of any family violence project assisted was not made public, except with express written authorization of the person responsible for the operation of such project?   [24 CFR 578.23(c)(4)(ii); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. establish policies and practices that were consistent with, and did not restrict, the exercise of rights provided by Subtitle B of Title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness?   [24 CFR 578.23(c)(4)(iii); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. in the case of projects that provided housing or services to families, the subrecipients designated a staff person to be responsible for ensuring that children being served in the program were enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act?   [24 CFR 578.23(c)(4)(iv); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. the subrecipient, its officers, and employees were not debarred or suspended from doing business with the Federal Government?   (To obtain a list of current entities or individuals that have been declared ineligible to receive federal contracts, locate the Department of Labor’s Office of Federal Contract Compliance Programs website.)  [24 CFR 578.23(c)(4)(v); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. information, such as data and reports, was provided as required by HUD?   [24 CFR 578.23(c)(4)(vi); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient monitor the subrecipients’ match documentation for compliance with requirements?  [24 CFR 578.23(c)(6); 24 CFR 578.103(a)(10)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient monitor the subrecipients for compliance with the requirements at least annually?  [24 CFR 578.23(c)(8); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the CoC establish a centralized or coordinated assessment system?  b. Does the CoC operate a centralized or coordinated assessment system?  c. Does the centralized or coordinated assessment system meet the requirements established in 24 CFR 578.7(a)(8)?  d. Did the recipient use the centralized or coordinated assessment system established by the CoC that meets the requirements in 24 CFR 578.(a)(8)?  NOTE: Victim service providers may choose not to use the CoC's centralized or coordinated assessment system, provided that victim service providers in the area use a comparable centralized or coordinated assessment system that meets HUD's minimum requirements.  [24 CFR 578.23(c)(9); 24 CFR 578.103(a)(17); 24 CFR 578.7(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the CoC establish written standards for providing Continuum of Care assistance?  b. Do the standards include the requirements established in 24 CFR 578.7(a)(9)?  c. Did the recipient adopt written standards for providing CoC assistance developed by the CoC that meet regulation requirements listed in 578.7(a)(9)?  [24 CFR 578.23(c)(10); 24 CFR 578.103(a)(17); 24 CFR 578.7(a)(9)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient execute subrecipient agreements requiring the subrecipients to operate the project(s) in accordance with the provisions of the McKinney-Vento Act?  [24 CFR 578.23(c)(11); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Unified Funding Agency (UFA) share administrative funds with its subrecipients as required?  [24 CFR 578.59(b)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient is not a UFA, did the recipient share at least 50 percent of its project administration dollars with its subrecipients?  [24 CFR 578.59(b)(2); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient distribute the appropriate portion of CoC Program funds to a subrecipient no later than 45 days after receiving an approvable request?  [24 CFR 578.85(c)(2); 24 CFR 578.103(a)(16)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records document that the recipient drew down funds at least once per quarter of the program year (after eligible activities commenced)?  [24 CFR 578.85(c)(3); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the recipient provide supportive services for residents of the project and homeless persons using the project – to the extent practicable, which may be designated by the recipient or participant?  b. Does the recipient or subrecipient conduct an ongoing assessment of the supportive services needed by the residents of the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and make adjustments, as appropriate?  [24 CFR 578.75(e)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. Homeless Management Information System (HMIS)

NOTE: The HUD reviewer MUST complete Exhibit 29-10, *Guide for Review of CoC Homeless Management Information System (HMIS) Requirements*, to answer questions 14-15.

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm grant funds expended were for eligible HMIS costs?  [24 CFR 578.57(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the recipient or its subrecipents submitted client data to the CoC- designated HMIS (or comparable database, as applicable) for all program participants assisted? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. Financial and Internal Controls

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient establish fiscal controls and accounting procedures to assure the proper disbursal of, and accounting for, grant funds to ensure that all financial transactions were conducted, and records maintained, in accordance with generally accepted accounting principles?  [24 CFR 578.23(c)(5); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds 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:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the fiscal records provide evidence that the recipient(s) has effective internal control over, and accountability of, all grant funds, property and other assets and that fiscal records are adequately safeguarded?  [24 CFR 578.103; 24 CFR 84.21(b)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the sample transaction records indicate that grant expenditures were eligible costs under regulations?  [24 CFR 578.37] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the sample transaction records indicate that grant expenditures were allocable to the program?  [24 CFR 578.37; 24 CFR 578.103; 24 CFR 84.21(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the sample transaction records indicate that grant expenditures are supported by adequate source documentation (invoices, contracts, or purchase orders)?  [24 CFR 578.103] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the recipient’s financial records find that cash payments were not being provided directly to the program beneficiaries?  NOTE: Cash payments may not be made directly to program beneficiaries. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a single audit is required for the recipient, is there documentation that the audits have been reviewed for compliance and that the recipient has taken appropriate follow-up actions, if necessary?  [24 CFR 578.99(g); 24 CFR 84.26] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If any indirect costs were charged to the grant, do records confirm that the allocations to each eligible activity were consistent with an indirect cost rate proposal developed in accordance with OMB Circular A-87 or A-122, as applicable?  [24 CFR 578.63(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. MATCH

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. For recipients that are not UFAs or the sole recipient in their CoC, do records document that the match contributions were at least equal to 25 percent of the total grant amount, less any funds awarded for leasing? 2. For recipients that are UFAs or the sole recipients in their CoC, do records document that the match contributions were at least equal to 25 percent of the funds awarded to the entire CoC, less any amounts awarded for leasing?   NOTE: The HUD Reviewer MUST complete Exhibit 29-11, *Guide for Review of CoC Match Requirements*, to answer this question.  [24 CFR 578.73(a); 24 CFR 578.103(a)(10); 42 U.S.C. 11386, Section 430] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

E. PROGRAM INCOME

26.

|  |  |
| --- | --- |
| If the recipient engaged in grant-supported activities that generate program income, such as occupancy fees, do records confirm the following: | |
| 1. program income earned during the grant term was retained by the recipient and committed to the project, as evidenced on financial reports?   [24 CFR 578.97(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. program income was expended on eligible costs?   [24 CFR 578.97(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

F. LIMITATION ON USE OF FUNDS

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records confirm no CoC Program funds or any state or local government funds used to supplement the federal assistance were used to replace state or local funds previously used, or designated for use, to assist homeless persons?  [24 CFR 578.87(a); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In providing services and outreach activities related to such services supported in whole or part with CoC Program funds, do records document that the recipient did not discriminate against a program participant or prospective program participant on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice?  [24 CFR 578.87(b)(1); 24 CFR 578.87(b)(ii); 24 CFR 578.103(a)(13] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For recipients that engage in explicitly religious activities, do records document that the recipient performed such activities and offered such services outside of programs that are supported with federal financial assistance separately, in time or location, AND indicated that participation in such religiously explicit activities was voluntary for program participants?  [24 CFR 578.87(b)(2); 24 CFR 578.103(a)(13)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records document that the recipient did not use direct CoC Program funds to support or engage in explicitly religious activities or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law?  [24 CFR 578.87(b)(3); 24 CFR 578.103(a)(13)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a program participant or prospective program participant objected to the religious character of a recipient that provided services, do records document that the recipient undertook reasonable efforts to identify and refer the program participant to an alternative provider to which the program participant has no objection within a reasonably prompt time after the objection?  [24 CFR 578.87(b)(4); 24 CFR 578.103(a)(13)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records confirm that structures that were acquired, constructed or rehabilitated with grant funds are not used for explicitly religious activities?  [24 CFR 578.87(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If program funds are used for the acquisition, construction, or rehabilitation of structures, do the records confirm that the structures are used for conducting eligible activities?  [24 CFR 578.87(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records confirm that, for structures that are used for both eligible and explicitly religious activities, program funds used to acquire, construct or rehabilitate the structure did not exceed the cost of the portions of the acquisition, new construction, or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to the Continuum of Care program?  [24 CFR 578.87(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm that grant funds were not used to acquire, construct or rehabilitate a room that a religious congregation used or uses as its principle place of worship?  [24 CFR 578.87(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

G. TERMINATION OF ASSISTANCE

36.

|  |  |
| --- | --- |
| Does the recipient have a formal termination of assistance process that includes at least the following: | |
| 1. the program participant’s receipt of written program rules and the termination process before the participant began to receive assistance;   [24 CFR 578.91(b)(1); 24 CFR 578.103(a)(7)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. the program participant’s receipt of written notice containing a clear statement of the reasons for termination;   [24 CFR 578.91(b)(2); 24 CFR 578.103(a)(7)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. a review of the decision, in which the program participant was given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and   [24 CFR 578.91(b)(3); 24 CFR 578.103(a)(7)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. the program participant’s receipt of prompt written notice of the final decision?   [24 CFR 578.91(b)(4); 24 CFR 578.103(a)(7)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

H. FAIR HOUSING AND EQUAL OPPORTUNITY

37.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient is serving a particular homeless subpopulation, do the records confirm that the housing addressed a need identified by the CoC for the geographic area served?  NOTE: Awards made under the Supportive Housing Program and the Shelter Plus Care Program that were renewed under the CoC Program and continue to serve the same population, the same number of persons or units in the same type of housing as identified in their most recently amended grant agreement signed before August 30, 2012, will continue to be administered in accordance with 24 CFR 582.330 and 24 CFR 583.325, respectively.  [Sec. V.E.3.1 of CoC FY 2014 NOFA; 24 CFR 578.93(b); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records confirm that the recipients and subrecipients serving a particular homeless subpopulation meet one of the following:   * 1. the housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;   2. the housing is limited to families with children;   3. if the housing residence has at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime;   4. sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises;   5. if the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation;   6. homeless persons and families who need the specialized supportive services that are provided in the housing?   [24 CFR 578.93(b)(1)-(7)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

39.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient implement its programs in a manner that affirmatively furthers fair housing, meaning it has implemented all of the following:   1. The recipient affirmatively marketed its housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who were least likely to apply in the absence of special outreach, and maintained records of those marketing activities? 2. If the recipient encountered a condition or action that impeded fair housing choice for current or prospective program participants, the recipient provided such information to the jurisdiction(s) that provided the Certification of Consistency with the Consolidated Plan? 3. The recipient provided program participants with information on rights and remedies available under applicable federal, state, and local fair housing and civil rights laws?   NOTE: The HUD reviewer must complete Exhibit 22-5, *Guide for Review of Civil Rights-Related Program Requirements for CPD Non-Formula Programs*, in Chapter 22 of this Handbook to answer this question*.*  [24 CFR 578.93(c)(1); 24 CFR 578.103(a)(14)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

40.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records confirm that age and gender of a child under 18 are not used as a basis for denying any family’s admission to this project?  [24 CFR 578.93(e); 24 CFR 578.103(a)(14)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

I. DISPLACEMENT, RELOCATION, AND ACQUISITION

41.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a tenant was displaced from an existing building not assisted under Title IV of the McKinney-Vento Act and the tenant moves for such a project under conditions where the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 apply, do records show that the participant was treated as permanently displaced and offered relocation assistance and payments consistent with 24 CFR 578.83(c)?  [24 CFR 578.83; 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a CoC program participant was displaced from an existing transitional or permanent supportive project assisted under Title IV of the McKinney-Vento Act, do records show that the participant was treated as permanently displaced and offered relocation assistance and payments consistent with 24 CFR 578.83(c)?  [24 CFR 578.83; 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

J. ENVIRONMENTAL REVIEW

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm an environmental review was completed prior to committing or expending CoC Program funds or local funds on any eligible program activities or acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a CoC project?  [24 CFR 578.103(a)(17); Sec. V.E.3.1 of the CoC FY 2014 NOFA] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

K. PROGRAM OVERSIGHT AND OPERATIONS

44.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm that housing and facilities constructed or rehabilitated with CoC Program funds met state or local building codes, and in the absence of state or local building codes, the International Residential Code or International Building Code (as applicable to the type of structure) of the International Code Council?  [24 CFR 578.75(a)(1); 24 CFR 578.103(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

45.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient or its subrecipients physically inspect each unit to assure that the unit met Housing Quality Standards (HQS) before any CoC Program funds were used to lease the unit or provide rental assistance for the unit?  [24 CFR 578.75(b)(2); 24 CFR 578.103(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

46.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm that each CoC Program-assisted dwelling unit had at least one bedroom or living/sleeping room for each two persons?  [24 CFR 578.75(c); 24 CFR 578.103(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

47.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm that children of the opposite sex, other than very young children, were not required to occupy the same bedroom or living/sleeping room?  [24 CFR 578.75(c)(1); 24 CFR 578.103(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

48.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If household composition changed during the term of assistance, did the recipient or its subrecipients relocate the household to a more appropriately sized unit and continued access to appropriate supportive services?  [24 CFR 578.75(c)(2); 24 CFR 578.103(a)(8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

49.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient or its subrecipients provides supportive housing for homeless persons with disabilities, were meals or meal preparation facilities provided for program participants?  [24 CFR 578.75(d); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

50.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the recipient provide supportive services for residents of the project and homeless persons using the project – to the extent practicable, which may be designated by the recipient or participant?  b. Did the recipient or its subrecipients conduct an ongoing assessment of the supportive services needed by program participants, the availability of such services, and the coordination of services needed to ensure long-term housing stability and were appropriate adjustments made?  [24 CFR 578.75(e); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

51.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient provide residential supervision as necessary to facilitate the adequate provision of supportive services to the residents of the housing throughout the term of the commitment to operate supportive housing?  [24 CFR 578.75(f); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

52.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was there participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient?  [24 CFR 578.75(g)(1); 24 CFR 578.103(a)(12)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

53.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient, 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?  [24 CFR 578.75(g)(2); 24 CFR 578.103(a)(12)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

54.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient requires, as condition of continued participation, that program participants take part in supportive services, do the records confirm that any of those required supportive services were not disability-related?  [24 CFR 578.75(h); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

L. RECORDKEEPING

55.

|  |  |
| --- | --- |
| Where an occupancy charge or rent was charged to a household, do records confirm that the recipient or its subrecipients retained the following documentation of annual income: | |
| 1. income evaluation form completed by the recipient;   [24 CFR 578.103(a)(6)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. source documents for the assets held by the program participant and income received before the date of the evaluation (e.g., most recent wage statements, unemployment compensation statement, public benefits statements, bank statement);   [24 CFR 578.103(a)(6)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. if source documents were unavailable, a written statement by the relevant third party or the written certification by the recipient’s intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent 3-month period; or   [24 CFR 578.103(a)(6)(iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. if source documents and third-party verification were unavailable, the written certification by the program participant of the amount of income that the program participant was reasonably expected to receive over the 3-month period following the evaluation?   [24 CFR 578.103(a)(6)(iv)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

56.

|  |  |
| --- | --- |
| Do records document that the recipient or its subrecipients retained the following records for the required time periods: | |
| 1. documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual, and other program participant records were retained for 5 years after the expenditure of all funds from the grant under which the program participant was served; and   [24 CFR 578.103(c)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. where CoC Program funds were used for the acquisition, new construction, or rehabilitation of a project site, were records retained until 15 years after the date that the project site was first occupied, or used, by program participants?   [24 CFR 578.103(c)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

57.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Did the recipient collect and report data on its use of CoC Program funds in an Annual Performance Report (APR), as well as any additional reports as and when required by HUD?   [24 CFR 578.103(e)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. For projects that received grant funds only for acquisition, rehabilitation, or new construction, did the recipient submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, or 20 years if the acquisition, rehabilitation, or new construction funds were awarded under the Supportive Housing Program)?   [24 CFR 578.103(e)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

M. SUPPORTIVE SERVICES

58.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient or its subrecipients take the educational needs of children into consideration when families were placed in housing and, to the maximum extent practicable, placed families with children as close as possible to their school of origin so as not to disrupt such children's education?  [24 CFR 578.23(c)(7); 24 CFR 578.103(a)(17)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

59.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For permanent supportive housing projects, do records confirm that available supportive services were designed to address the needs of program participants?  [24 CFR 578.37(a)(1)(i); 24 CFR 578.53(a); 24 CFR 578.103] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

60.

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

N. DRUG-FREE WORKPLACE

61.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the recipient and its subrecipients have a drug-free workplace statement as required?  [24 CFR 5.105(d); CoC Program NOFA; 24 CFR part 2424] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

62.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the requirements of the Drug-Free Workplace Certification were reviewed, are the recipient and its subrecipients in compliance?  [24 CFR 5.105(d); 24 CFR 576.407(a); CoC Program NOFA;  2 CFR 225; 2 CFR 230; 2 CFR part 2424] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

O. lobbying restrictions

63.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the certifications required under 24 CFR 87.110 filed by the recipient and all subrecipients and contractors that received a subgrant, contract, or subcontract exceeding $100,000 at any tier under the recipient’s grant?  [24 CFR 87.110; 24 CFR 5.105(b); CoC Program NOFA; 2 CFR 225; 2 CFR 230] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

64.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the recipient and each subrecipient and contractor that filed a certification also submit the appropriate disclosure forms, if and as required under 24 CFR part 87?  [CoC Program NOFA; 24 CFR 5.105(b); 24 CFR part 87; 2 CFR 225; 2 CFR 230] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

P. CONFLICT OF INTEREST

65.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient and its subrecipients procured property (goods, supplies, or equipment) and services, do records confirm compliance with the codes of conduct and conflict-of-interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private government organizations)?  [24 CFR 578.95(a); 24 CFR 578.103(a)(11); 24 CFR 84.42; 24 CFR 85.36] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

66.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm the recipient and its subrecipients and its employees, agents, consultants, officers, and elected or appointed officials ensured that they rendered impartial assistance in the provision of any type or amount of assistance because of activities or relationships with other persons or organizations?  [24 CFR 578.95(c); 24 CFR 578.103(a)(11)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

67.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records demonstrate that the recipient and its subrecipients and its employees, agents, consultants, officers, elected or appointed officials of the recipient complied with the individual conflict of interest requirements or obtained an exception from HUD?  [24 CFR 578.95(d)(3); 24 CFR 578.103(a)(11)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Q. lead hazard abatement requirements

68.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Lead-based paint: Where CoC funds were used for rehabilitation, acquisition, supportive services, operating, leasing, tenant based rental assistance (TBRA), or project based rental assistance (PBRA) of a structure constructed before 1978, do the records reflect that the recipient/subrecipient complied with all lead-based paint requirements?  NOTE: The HUD reviewer MUST complete the applicable Exhibits in Chapter 24 of this Handbook to answer this question: Exhibit 24-1 (Rehabilitation); Exhibit 24-2 (Acquisition, Leasing, Support Services, or Operations); Exhibit 24-3 (TBRA); or Exhibit 24-4 (PBRA).  [24 CFR 35.700-730; 24 CFR 35.900-940; 24 CFR 35.1000-1020; 24 CFR 35.1200-1225; 24 CFR 578.99(f); 24 CFR 578.75(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

R. SECTION 6002 OF THE SOLID WASTE DISPOSAL ACT

69.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the recipient have evidence of compliance with the procurement requirements of Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, and with guidelines of the Environmental Protection Agency?  [24 CFR 578.99(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

S. TRANSPARENCY ACT REPORTING

70.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the recipient and its subrecipients have evidence of compliance with the Federal Funding Accountability and Transparency Act (FFATA) requirements?  [24 CFR 578.99(c)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |