

**CONTINUUM OF CARE (CoC) PROGRAM  
INTERNAL WELLNESS “TOP TEN” LIST**

This “Top Ten” checklist is a supplement to the *CoC Internal Wellness Checklist*. It is intended to highlight ten critical recordkeeping areas in the operation of the CoC Program. Grantees are encouraged to utilize this resource to proactively monitor the current “health” of their CoC grants.

**Program Participant-Level Recordkeeping**

The critical records to be maintained for each program participant include:

<p><b>1. <input type="checkbox"/> Participant Eligibility</b> Ensure documentation of a participant’s homelessness or at-risk of homelessness status and disability, if applicable, is obtained at intake. <b>24 CFR 576.500(b) or (c); 24 CFR 578.103(a)(3), (4), or (5); and 24 CFR 103(a)(17)</b></p>	<p><b>4. <input type="checkbox"/> Housing Quality Standards (HQS)</b> Ensure structures or units assisted with CoC funds meet HQS at lease-up and are re-inspected at least annually thereafter. <b>24 CFR 578.75(b) and 24 CFR 578.103(a)(8)</b></p>
<p><b>2. <input type="checkbox"/> Leasing and Rental Assistance Requirements</b> Ensure rents charged for a structure or unit assisted with leasing or rental assistance funds meet standards of FMR or rent reasonableness. <b>24 CFR 578.49 and 24 CFR 578.51</b></p>	<p><b>5. <input type="checkbox"/> Use of a Coordinated Entry System</b> Ensure participants are assessed and referred using the CoC’s coordinated assessment system. <b>24 CFR 578.23(c)(9) and 24 CFR 578.103(a)(17)</b></p>
<p><b>3. <input type="checkbox"/> Examination of Income</b> Ensure participant income documentation is examined at intake and re-examined at least annually. <b>24 CFR 578.77(b)(4) and 24 CFR 578.103(a)(6)</b></p>	<p><b>6. <input type="checkbox"/> Use of Homeless Management Information System (HMIS)</b> Ensure participants are entered in the CoC’s HMIS or a comparable database. <b>24 CFR 576.500(b) or (c); 24 CFR 578.103(a)(3)</b></p>

**General Recordkeeping and Financial Files**

The critical records to be maintained by each recipient and/or subrecipient include:

<p><b>7. <input type="checkbox"/> Standard Operating Procedures</b> Maintain policies and procedures for intake, program operation, recordkeeping, and subrecipient oversight/monitoring to ensure that CoC funds are used appropriately. <b>24 CFR 578.103(a) and 24 CFR 578.23(c)</b></p>	<p><b>9. <input type="checkbox"/> Match Sources and Uses</b> Ensure grant funds, except leasing funds, are matched with no less than 25 percent of cash or in-kind contributions from other sources. <b>24 CFR 578.73 and 24 CFR 578.103(a)(10)</b></p>
<p><b>8. <input type="checkbox"/> Financial Policies and Procedures</b> Maintain fiscal controls, accounting procedures, and procurement procedures to ensure that CoC funds are used appropriately. <b>*2 CFR Part 200</b></p>	<p><b>10. <input type="checkbox"/> Homeless Participation</b> Enable homeless or formerly homeless persons the opportunity to participate in policymaking on the board of directors or other equivalent policymaking entity. <b>24 CFR 578.75(g)(1) and 24 CFR 578.103(a)(12)</b></p>

**NOTE:** For additional guidance, please refer to the following resource materials:

- (1) Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program CoC Regulations at 24 CFR Part 578, and (2) CPD Monitoring Handbook 6509.2 REV-6 CHG-2 at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2).

**\* (BLOCK 8) If a recipient chooses to utilize this document for projects funded prior to the FY 2015 CoC competition, please refer to 24 CFR 578.103(a), 24 CFR Part 84 and 24 CFR Part 85 for applicable financial requirements.**