

Internal Wellness Checklist for the Continuum of Care (CoC) Program

The *Internal Wellness Checklist* was developed in an effort to assist homeless providers to proactively implement its FY ____ CoC grant(s), thereby ensuring compliance with applicable regulations codified at 24 CFR Part 578. It is also designed to assist with determining the current “health” status of this CoC grant. Grant recipients are strongly encouraged to utilize this checklist prior to submitting the required APR to the U. S. Department of Housing and Urban Development.

Recipient Name: _____

Project Name: _____ Grant Term: 1 or 2 Yrs. _____

Grant Number: _____ Grant Amt.: _____ Expiration Date: _____

Date APR is Due to HUD: _____ Date APR Submitted: _____
(Not more than 90 days after the end of each CoC grant’s performance period)

General Recordkeeping

- ___ 1. Executed Grant Agreement
24 CFR 578.23(c)
- ___ 2. Documentation of Grant Amendment (request and approval, if applicable)
24 CFR 578.105
- ___ 3. Executed Grant Agreements with Subrecipients
24 CFR 578.23(c)(ii)
- ___ 4. Documentation subrecipients are not debarred
24 CFR 578.23(c)(4)(v)
- ___ 5. Documentation of annual monitoring of Subrecipients
24 CFR 578.23(c)(8)
- ___ 6. Executed Memorandum of Understanding with Service Providers
24 CFR 578.73(c)(3)
- ___ 7. Project Application should be maintained - ensure costs charged against the grant are consistent with the approved budget items identified in the application
24 CFR 578.59(a)
- ___ 8. Documentation that Annual Performance Report was submitted timely
24 CFR 578.103(e)
- ___ 9. Written CoC Program Policies and Procedures to include:
24 CFR 578.103(a)
 - ___ Intake/screening procedures
24 CFR 578.103(a)(3)and(4)

- ___ Personnel Policies and Procedures
2 CFR 200.303, and 24 CFR 578.103(a)
- ___ Termination Policy
24 CFR 578.91
- ___ Grievance Policy
24 CFR 578.91
- ___ Policy Privacy/Confidentiality Policy
24 CFR 578.103(b)
- ___ Drug-Free Workforce Policy
24 CFR 5.105(d), 24 CFR 2424, 24 CFR 225
- ___ Policy identifying the involvement of homeless/formerly homeless individuals
24 CFR 578.23(c)(3)
- ___ Domestic Violence Policy
24 CFR 578.23(c)(4)(i)(ii), 24 CFR 578.103(a)(17)
- ___ Housing First Policy, if applicable
HUD CPD Notice 14-02
- ___ 10. Documentation of participation of homeless/formerly homeless individuals in policymaking
24 CFR 578.75(g)(1)
- ___ 11. Documentation of compliance with environmental review requirements
24 CFR 578.99, 24 CFR 578.31
- ___ 12. Documentation of compliance with fair housing requirements
24 CFR 578.87(b), 24 CFR 578.103(a)(14) and (17), 24 CFR 578.93(c)(1)
- ___ 13. Documentation of other federal requirements (i.e. lead based paint, Section 3, Section 504), if applicable
24 CFR 578.99, 24 CFR 35, 24 CFR 578.99(b)

Financial Files

- ___ 1. Written Financial Policies
2 CFR 200.302, 24 CFR 578.23(c)(5), 24 CFR 578.103(a)
- ___ 2. Written Procurement Procedures
2 CFR 200.318 and 2 CFR 200.319
- ___ 3. Written Conflicts of Interest Policy
2 CFR 200.317 and 2 CFR 200.318, 24 CFR 578.95(a)
- ___ 4. Documentation of match (25% of total Grant Amount less leasing)
24 CFR 578.73(a)
- ___ 5. Documentation of Grant Expenditures (during grant term and for approved items in application)
24 CFR 578.37, 24 CFR 578.103
- ___ 6. Documentation of Indirect Cost Rate Proposal, if applicable
24 CFR 578.63(b), 24 CFR 578.103(a)(17)

- ___ 7. Documentation showing compliance with the Single Audit Act
24 CFR 578.99(g), 2 CFR 200 subpart F
- ___ 8. Documentation showing quarterly draw requests
24 CFR 578.85(c)(3)
- ___ 9. Documentation showing program income was expended prior to HUD draw requests, if applicable
24 CFR 578.97(b)

Participant Program Files

- ___ 1. Documentation participants are entered into HMIS or a comparable database
24 CFR 578.103(a)(3)
- ___ 2. Documentation participant was screened via centralized or coordinated assessment systems
24 CFR 578.23(c)(9)
- ___ 3. Documentation of Homelessness at intake
24 CFR 578.103(a)(3)
- ___ 4. Permanent Supportive Housing -Documentation of disability
24 CFR 578.37(a)(i)
- ___ 5. Transitional Housing- No more than 24 months of services provided except under documented extenuating circumstances
24 CFR 578.79
- ___ 6. Documentation of ongoing assessment of services
24 CFR 578.75(e)
- ___ 7. Documentation of examination of income (initial and recertification)
24 CFR 578.103(a)(7)(i)
- ___ 8. Documentation of initial and follow-up Housing Quality Standards inspections
24 CFR 578.75(b)(2)
- ___ 9. Leasing-Documentation that the unit/structure is not owned by recipient or subrecipient
24 CFR 578.49(a)
- ___ 10. Leasing-Documentation lease is between agency and landlord
24 CFR 578.49(b)(5)
- ___ 11. Leasing-Is there an occupancy agreement, lease or sublease in the file (for individual units)?
24 CFR 578.103(a)(17)
- ___ 12. Leasing-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.49(b)(1)
- ___ 13. Rents charged (including utilities) do not exceed HUD-Fair Market Rents
24 CFR 578.49(b)(2)
- ___ 14. Documentation supporting the correct/current utility allowance schedule is used
24 CFR 578.103(a)(17), 24 CFR 578.49(a)(3)

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- ___15. Leasing-Documentation of occupancy charges with annual income calculations
24 CFR 578.77, 24 CFR 578.99(b)(6)
- ___16. Rental-Documentation the participant has a an executed lease agreement with the landlord
24 CFR 578.77, 24 CFR 578.51(d)(e)
- ___17. Rental-Documentation of rent reasonableness for the period of approval for an assisted unit
24 CFR 578.51(g)

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) Monitoring handbook 6509.2 REV-6 CHG-2 that can be accessed at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2.

Completed by:

Signature: _____ Date: _____

Typed/Printed Name: _____ Title: _____

This document is to be maintained in the applicable CoC project file.

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

General Recordkeeping and Financial Files

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

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

*** (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.**