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)
___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 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:

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:

<table>
<thead>
<tr>
<th>1.</th>
<th>Participant Eligibility</th>
<th>Ensure documentation of a participant’s homelessness or at-risk of homelessness status and disability, if applicable, is obtained at intake.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>24 CFR 576.500(b) or (c); 24 CFR 578.103(a)(3), (4), or (5); and 24 CFR 103(a)(17)</td>
</tr>
<tr>
<td>4.</td>
<td>Housing Quality Standards (HQS)</td>
<td>Ensure structures or units assisted with CoC funds meet HQS at lease-up and are re-inspected at least annually thereafter.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>24 CFR 578.75(b) and 24 CFR 578.103(a)(8)</td>
</tr>
</tbody>
</table>

| 2.  | 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                                                                                                  |

| 3.  | 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)                                                                                   |

| 5.  | 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)                                                                                   |

| 6.  | 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)                                                                                   |

General Recordkeeping and Financial Files

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

| 7.  | 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)                                                                                           |

| 8.  | Financial Policies and Procedures | Maintain fiscal controls, accounting procedures, and procurement procedures to ensure that CoC funds are used appropriately. |
|     |                         | 24 CFR 578.75(g)(1) and 24 CFR 578.103(a)(12)                                                                                     |

| 9.  | 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)                                                                                           |

| 10. | 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 578.103(a)(12)                                                                                                            |

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:


*(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.