CONTINUUM OF CARE PROGRAM APPLICANT EXPECTATIONS

Texas Homeless Network (THN) serves as the Collaborative Applicant and Lead Agency for the Texas Balance of State Continuum of Care (TX BoS CoC) and as such is charged by the United States Department of Housing and Urban Development (HUD) to operate and administer CoC activities and to analyze CoC Program Applicant performance (24 CFR Part 578).

To further CoC goals and to clarify expectations, the TX BoS CoC has established CoC Program Recipient responsibilities in this document to be signed annually by an authorized representative of the CoC Program Recipient agency. New project Applicants are also required to complete this document, which commits the Applicant to uphold Recipient responsibilities should funds be awarded. This document will be signed by an authorized representative of the TX BoS CoC and returned to the agency, serving as a formalized understanding of roles of the CoC.

CoC Program Recipients have a grant agreement with HUD. The CoC Program Recipient is responsible for adhering to all requirements and obligations outlined by HUD in addition to the expectations outlined by the CoC in this document. In the event that CoC Program Recipient responsibilities change, revisions will be made to this certification, and a new signature by an authorized representative of the CoC Program Recipient agency will be required.

EXPECTATIONS

Before applying for renewal or new CoC Program funding, all Project Applicants should read the following items:
- CoC Program Interim Rule (24 CFR Part 578), as it provides the requirements for implementation and administration of the CoC Program.
- FY 2019 CoC Program Notification of Funding Availability (NOFA)
- Opening Doors
- Home, Together
- TX BoS CoC Policies and Procedures
- TX BoS CoC Written Standards for Service Delivery
- TX BoS CoC Coordinated Entry Written Standards

New Project Applicants are strongly encouraged to complete the following training upon award notification from HUD. These training will provide understanding of HUD expectations and project compliance:
- CoC Program Components/Eligible Costs

https://www.hudexchange.info/resource/3146/coc-program-components-and-eligible-costs/
- CoC Program Administration
https://www.hudexchange.info/training-events/courses/coc-program-grant-administration/
- Financial Management Curriculum
https://www.hudexchange.info/trainings/financial-management-curriculum/

HMIS Participation and Coverage

CoC Program Recipients must collect information on persons served and services provided during the grant period and enter this information into the TX BoS CoC's Homeless Management Information System (HMIS), ClientTrack.

Victim Service Providers (VSPs) are prohibited from participating in HMIS. VSPs must demonstrate that they have a database comparable to an HMIS and are able to provide aggregate data and HUD-mandated reports from that database upon request. (Ex: Osnium) For more information about mandated exclusions from HMIS and whether your Agency is affected, please follow this link to the HUD Exchange.

CoC Program Recipients must also:
- Adhere to the HMIS Policies and Procedures Manual and User Agreements, including timeliness expectations
- Designate and utilize an HMIS Agency Admin as required by the Agency Agreement
- Attend Quarterly mandatory HMIS webinars, as scheduled
- Complete quarterly Data Quality Reports (UDQ)to submit by the deadline identified by HMIS Staff,
- Make corrections to those, or other reports as requested by HMIS staff
- Commit to a process of data quality improvement by, running and reviewing Annual Performance Reports (APRs) and Data Quality Reports on a monthly basis.

Consumer Involvement

All Project Recipients & Subrecipients are required to have an individual or individuals with lived experience on the Board of Directors or other equivalent policymaking entity. Recipients must keep a letter on official letterhead documenting that at least one person currently experiencing homelessness or formerly homeless serves on the Board or other equivalent policy-making entity.

Project Recipient & Subrecipients are encouraged to involve individuals experiencing homelessness and project participants when designing the project and in ongoing project execution.

Project Parameters

All projects must follow the TX BoS CoC Policies and Procedures and the TX BoS CoC Written Standards for the project type. Recipients are expected to maintain Policies and Procedure manuals which detail project eligibility determination, service delivery, federal

Updated 7/22/2019

compliance, and project policies in line with the TX BoS CoC Policies and Procedures and the TX BoS CoC Written Standards.

Coordinated Entry

Participation in a Coordinated Entry (CE) process is a requirement of [24 CFR Part 578](#) for all Recipients of CoC Program funds. The TX BoS CoC released the [TX BoS CoC Coordinated Entry Written Standards](#) on June 12, 2017. Communities with CoC Program Recipients must implement CE according to the TX BoS CoC Coordinated Entry Written Standards, and CoC Program Recipients must participate in the implementation of a local system.

In Communities where a local Coordinated Entry System does not exist, CoC Funded Agencies are looked to as leaders in the implementation. If a project is awarded in a region without a CE Process, it is expected that the awarded agency will work towards implementation prior to contract execution and/or the negotiated Operational Start Date. . Questions about participation in Coordinated Entry should be directed to the TX BoS CoC Systems Change Coordinator, Tiffany Hart, at [tiffany@thn.org.](#)

General Recipient Performance & Expectation
- Recipients must receive approval from the TX BoS CoC prior to requesting a grant extension from HUD.
- Recipients must receive approval from the TX BoS CoC prior to requesting a significant change from HUD, including proposals for: grant transfer, change in sub-recipients, change of project site, addition or elimination of eligible costs for a project, change in subpopulation, reduction in the number of units funded, and/or any budget changes greater than 10% of the budget line being reduced.
- Recipients are strongly encouraged to participate in a Quality Review Plans (QRP), Corrective Action Plan (CAP), or HUD Technical Assistance (TA)-led assistance if mandated by the TX BoS CoC and/or HUD. Recipients who are conditionally included for involuntary reallocation consideration may increase the likelihood of being fully reallocated if they chose not to participate in available TA opportunities. Please review the Conditional Inclusion Policy and Reallocation Policy for more information.
- Recipients are encouraged to provide Annual Performance Reports (APRs) to TX BoS CoC staff for review at least two (2) weeks prior to HUD submission in order to submit an accurate report of project performance.
- Recipients are expected to participate in the Quarterly Performance Score Card Process.
- Per the TX BoS CoC Policies and Procedures, Recipients must carbon copy ("cc") TX BoS CoC staff on all communications with HUD regarding monitoring.
- Recipients must notify THN of receipt of a HUD monitoring notification or monitoring report within 48 hours.
- Project staff is encouraged to a case conference with THN prior to any involuntary project participant terminations.
- If funded for SSO-CE through the DV Bonus, the CoC expects the Project Recipient to work with THN, the CoC Lead Agency, on a training, to be provided at least annually, for CoC Projects and Coordinated Entry Staff regarding safety and best

practices, e.g., trauma-informed survivor-centered, on safety and planning protocols in serving survivors of domestic violence.

Project Oversight

- Recipients of CoC Program Funding must have an accounting system compliant with 2 CFR 200,
- It is required that all recipients of CoC Program Funding in the Texas Balance of State develop and maintain an Internal Control environment that is in compliance with 2 CFR 200.303,
- It is expected that where a recipient and sub-recipient relationship exists, there is a sub-recipient agreement in place which includes provisions for monitoring and oversight.
- Recipients of CoC Program Funding are required by the TX BoS CoC to develop, implement, and maintain an Internal Monitoring Policy covering awarded CoC Projects. Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.

CoC Engagement

- Recipients must participate in all trainings designated as mandatory that are conducted or sponsored by TX BoS CoC by having at least one representative staff member with direct involvement in operations and/or oversight of the project participate either via webinar or in-person, as required.
- Recipients must participate in the local Point-in-Time Count (PIT) and Housing Inventory Counts (HIC) and submit data collected by the deadlines established by TX BoS CoC.
- Recipients are expected to attend a majority of CoC General Meetings.
- Recipients are expected to participate in CoC Committees and Workgroups,
- Recipients are expected to participate in their Local Homeless Coalition.
- Recipients are expected to work collaboratively with their community partners to end homelessness
- Recipients are expected to create and maintain an effective homelessness response system, that achieves measurable progress toward making homelessness rare, brief and where possible, one-time.

THN Expectation

- As the Lead applicant for the TX BoS CoC, THN must facilitate and manage the annual Continuum of Care Completion.
- THN must complete the annual CoC Application to be submitted with the Consolidated Application.
- THN must solicit input, create, and maintain CoC Governance Documents, Written Standards, and Policies & Procedures.

- THN must facilitate CoC General Meetings, Committees, the CoC Board, and trainings.
- THN must provide technical assistance and best practice recommendations to agencies operating within the CoC Geographic Area.
- THN must provide guidance, recommendation, and training to the CoC Board, and THN must act in good faith to carry out decisions of the CoC Board.
- As the HMIS Lead Agency, THN must maintain and facilitate the Homeless Management Information System (HMIS).
- THN provides training to new HMIS users and assists to maintain high data quality standards of the HMIS data.
- THN reports HMIS data to HUD annually.
- THN manages and facilitates the annual Point in Time Count and Housing Inventory Count, and THN analyses this data and provides it to HUD.

The expectations in this form are not intended to be interpreted as an exhaustive list of responsibilities for Recipients of CoC Program Funds, or for the Texas Homeless Network. It is understood that should any expectation in this document conflict with Federal, or State statute, the remaining expectations remain valid. My signature below acknowledges these expectations and to the greatest extent possible, the commitment to comply with them.

AUTHORIZED AGENCY REPRESENTATIVE INFORMATION

Agency:	
Contact Person:	
Email Address:	
Contact Number:	

I have read, understand, and agree to the expectations set forth in this agreement. (Current Recipients acknowledge these expectations become effective upon date signed below)

_____   _____
Signature   Date

_____   _____
Printed Name   Title