**CoC NY-505 (Syracuse, Onondaga and Oswego Counties)**

**Program Grant Management**

Subrecipient Monitoring Checklist

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| **CoC NY-505 Monitoring Team Information** | |
| Monitoring Staff: | |
| Date of Monitoring Visit: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| **CoC Program Grantee: Agency and Program Information** | |
| Agency: | |
| Program Name: | |
| Agency staff consulted: | |
| Grant Amount: | |
| Contract Number: | |
| Program Type: | ⎕PSH ⎕RRH |
| Number to be served: | |
| Number of chronic beds/units: | |
| Program serves: ⎕ Individuals ⎕ Families ⎕ Both Individuals and Families | |
| CoC Program grant funds are used for: | |
| ⎕ Rental Assistance ⎕ Leasing (no match required) | |
| ⎕ Operations ⎕ Admin | |
| ⎕ Supportive Services | |
| Is the agency a faith-based organization? ⎕ Yes ⎕ No  CoC Matching funds (25% required) are: ⎕ Cash/Cash Equivalent ⎕ In Kind ⎕ N/A | |
| Is there an active restrictive covenant on one or more of the project properties? ⎕ Yes ⎕ No | |

# PART 1: PROGRAM MONITORING

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| **AGENCY OPERATIONS; POLICIES AND PROCEDURES** | | |
| **Conflict of Interest** | | |
| 1. The agency has a general conflict-of-interest policy for staff and Board members. 24 CFR § 578.95(c); 24 CFR § 578.103(a)(11) | ⎕ Yes  ⎕ No |  |
| **Involvement of homeless persons** | | |
| 1. There is at least one homeless/formerly homeless person is on the Board of Directors or equivalent policymaking entity. 24 CFR § 578.75(g)(1) | ⎕ Yes  ⎕ No |  |
| 2. The agency involves 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 § 578.75 (g)(2) | ⎕ Yes  ⎕ No |  |
| **Confidentiality** | | |
| 1. The agency has written policies to ensure:  Records containing protected identifying information of any individual/family receiving assistance will be kept confidential;  The location of any family violence project will not be made public, except with the written permission of the person responsible for operating the project; and  The location of any housing of any program participant will not be made public, except as provided in a preexisting privacy and as provided by law.  24 CFR § 578.103(b) (These policies are in addition to HMIS- related confidentiality/security requirements.) | ⎕ Yes  ⎕ No |  |
| **Fair Housing and Equal Opportunity** | | |
| 1. The agency has written nondiscrimination and equal opportunity policies that apply to housing and employment. 24 CFR § 578.93 | ⎕ Yes  ⎕ No |  |
| 2. The agency has policies and procedures for providing reasonable accommodations and reasonable modifications for persons with disabilities. 24 CFR § 100.204(a), 28 CFR § 35.130(b)(7) | ⎕ Yes  ⎕ No |  |

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| 3. The agency maintains copies of marketing, outreach, and other materials used to inform eligible persons of the program and these materials show that the agency markets their housing and supportive services to those least likely to apply in the absence of special outreach. 24 CFR § 578.93 (c)(1) | ⎕ Yes  ⎕ No |  |
| 4. The agency has policies and procedures in place to provide meaningful access for Spanish-speaking and other Limited English Proficiency persons to access the agency’s programs and services. 72 Fed Reg. 2732 | ⎕ Yes  ⎕ No |  |
| 5. The agency provides program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws. 24 CFR § 578.93(c)(3) | ⎕ Yes  ⎕ No |  |
| **Drug-Free Workplace** | | |
| 1. The agency has a drug-free workplace policy statement which includes the requirement of notification to HUD if an employee is convicted for a criminal drug offense. 24 CFR § 84.13 | ⎕ Yes  ⎕ No |  |

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| **POLICIES AND PROCEDURES FOR COC GRANT-FUNDED PROGRAM** | | | |
| **Number served** | | | |
| 1. The agency serves at least as many program participants as shown in its application for assistance. 24 CFR § 578.51(h)(3) | ⎕ Yes  ⎕ No |  | |
| **Termination Process** | | | |
| 1. The agency has a written policy for termination of participation for violation of program policies or occupancy agreements. 24 CFR § 578.91 (b) | ⎕ Yes  ⎕ No |  | |
| **Services Related to Housing Stability** | | | |
| 1. The supportive services funded by the CoC grant are necessary for maintenance of housing. 24 CFR § 578.53(a) | ⎕ Yes  ⎕ No |  | |
| **Residential Supervision** | | | |
| 1. The agency provides adequate residential supervision. 24 CFR § 578.75(f) | ⎕ Yes  ⎕ No |  | |
| **Program Fees** | | | |
| 1. The agency does not charge program participants program fees. 24 CFR § 578.87 (d) [Program fees are not the same as rent; program participants may be charged rent for housing.] | ⎕ Yes  ⎕ No | |  |
| **Recordkeeping** | | | |
| 1. The agency has systems in place to ensure that records related to CoC-funded program are maintained for a 5-year period. 24 CFR § 578.103 | ⎕ Yes  ⎕ No | |  |



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| **REVIEW OF CoC PROGRAM PARTICIPANT FILES** | | |
| **Eligibility: Homelessness** | | |
| 1. Each participant file contains verification of homelessness status at the time of program entry. 24 CFR § 578.103(a)(3); 24 CFR § 576.500(b) | ⎕ Yes  ⎕ No |  |
| 2. Agency has written policies and procedures for documenting homelessness. Intake staff document eligibility at intake; documentation is required for all persons seeking assistance; written policies state the evidence that may be relied upon to establish and verify homeless status. Agency makes efforts to get the appropriate documentation. In order of preference:  Third party documentation Intake worker observations  Certification from the person seeking assistance | ⎕ Yes  ⎕ No |  |
| **Eligibility: Disability** | | |
| 1. *If the program provides PSH,* each participant file contains verification of participant’s disability. 24 CFR 578.37(a)(1)(i)  Verification from a professional who is licensed to diagnose and treat condition OR  Disability verified by the Social Security Administration in the form of a VA disability check, or an SSDI check. | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Eligibility: Chronic homelessness** | | |
| 1. *If the program has units dedicated to persons who are chronically homeless,* participant files contain verification of chronic homelessness. | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Service Assessments** | | |
| 1. The file contains participant assessments and service plans, updated at least annually. 24 CFR § 578.53(a) | ⎕ Yes  ⎕ No |  |
| **Duration of Services** | | |
| 1. The file reflects that supportive services are made available throughout resident’s entire time in the project. 24 CFR § 578.53(b) | ⎕ Yes  ⎕ No |  |
| 2. *Rapid rehousing:* the file reflects that program participant meets with case manager not less than once per month. 24 CFR  578.53 (b)(4) | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Participants Terminated from Program** | | |
| 1. If participant has been terminated from the program, file includes documentation that the agency followed its written procedure for termination of assistance. 24 CFR § 578.103(a)(7)(ii); 24 CFR § 578.91 | ⎕ Yes  ⎕ No  ⎕ n/a |  |

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| **RENTAL ASSISTANCE OR LEASING**  *Complete this section if the agency pays rental assistance or leasing costs for a unit that the program participant lives in.* | | |
| **Rental Agreement/Lease** | | |
| 1. The program participant has an occupancy agreement or lease with the agency or with the property owner. 24 CFR § 578.77(a) For tenant and project based assistance, the program participant must be the tenant on the lease. For sponsor based assistance, lease between sub-recipient and owner, sub-lease between participant and sub-recipient. | ⎕ Yes  ⎕ No |  |
| 2. *For project-based, sponsor-based, or tenant-based permanent housing (PH) rental assistance*: initial lease must be at least one year, terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. 24 CFR § 578.51(l)(1) | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Habitability** | | |
| 1. File includes documentation that units passed housing quality standards inspection prior to initial client move-in. 24 CFR § 578.75(b); 24 CFR § 578.103(a)(8) | ⎕ Yes  ⎕ No |  |
| 2. File includes documentation that unit has passed annual housing quality standards inspections, including an inspection within the last 12 months. 24 CFR § 578.75(b) | ⎕ Yes  ⎕ No |  |
| 3. Dwelling unit is correct size: The dwelling unit must have at least one bedroom or living/sleeping room for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. 24 CFR § 578.75(c) | ⎕ Yes  ⎕ No |  |
| 4. For supportive housing for persons with disabilities: the agency must make available meal preparation facilities for residents or provide meals. 24 CFR § 578.75(d) | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Unit Rents** | | |
| 1. Documentation that rents are reasonable in relation to rents charged in the same geographic area for comparable space. 24 CFR § 578.49(b) | ⎕ Yes  ⎕ No |  |
| 2. Rents do not exceed the HUD-determined Fair Market Rents (FMRs). This documentation must include chart showing current year’s FMRs. 24 CFR § 578.49(b)(2) | ⎕ Yes  ⎕ No |  |
| **Annual Income** | | |

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| 1. The file contains documents demonstrating that income is re- examined annually. 24 CFR § 578.77(c)(2) | ⎕ Yes  ⎕ No |  |
| **Rent Calculation** | | |
| 1. The file contains the annual rent calculation, and the calculation is accurate. BEST PRACTICE: The file contains a printout of the HUD rent calculation from [www.onecpd.info/incomecalculator.](http://www.onecpd.info/incomecalculator) 24 CFR § 578.103 | ⎕ Yes  ⎕ No |  |
| 2. Is the participant charged rent (unless $0 income) and is the rent treated as program income? (required) | ⎕ Yes  ⎕ No |  |
| 3. Is rent calculated initially, annually, and when there is any change in income? | ⎕ Yes  ⎕ No |  |
| **Vacancies** | | |
| 1. Rental Assistance Only: The agency does not pay rent for more than 30 days for any unit that has been vacated. Rent may not be paid on the vacated unit again until there is a new occupant. (NOTE: Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.) 24 CFR § 578.51(i) | ⎕ Yes  ⎕ No |  |

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| **LEASING**  *Complete this section if the agency leases buildings for the purpose of providing program services or if the agency has a unit lease agreement with a landowner.* | | |
| **Rent Reasonableness (applies to rent for buildings or housing units)** | | |
| 1. Documentation that rents are reasonable in relation to rents charged in the same geographic area for comparable space. 24 CFR  § 578.49(b) | ⎕ Yes  ⎕ No |  |
| 2. Rents do not exceed rents charged for comparable units rented by the agency. 24 CFR § 578.49(b) | ⎕ Yes  ⎕ No |  |
| 3. Security deposit does not exceed two months’ rent; in addition to the security deposit, the agency may also pay the final months’ rent in advance. 24 CFR § 578.49(b)(4) | ⎕ Yes  ⎕ No |  |
| 4. The agency must have an occupancy agreement, and, if applicable, a sublease. | ⎕ Yes  ⎕ No |  |
| 5. Leasing funds are not used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), or organizations that are members of a partnership where the partnership owns the structure. (Doesn’t apply to rental assistance). | ⎕ Yes  ⎕ No |  |

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| **REQUIRED POLICIES AND PROCEDURES FOR SPECIFIC PROGRAMS/CIRCUMSTANCES** | | |
| **Family Policies**  *Complete this section for any program that serves families with children* | | |
| 1. The age and gender of a child under age 18 must not be used as a basis for denying any family‘s admission to a project that receives funds under this part. | ⎕ Yes  ⎕ No |  |
| **Faith-based Activities**  *Complete this section if the agency is a faith-based organization.* | | |
| 1. The agency serves all potential participants without regard to religious belief, refusal to hold a religious belief, or refusal to attend or participate in religious services. 24 CFR § 578.87 (b)(1) | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| 2. If the agency provides explicitly religious activities (including worship, religious instruction, or proselytizing), these activities are separate from HUD-funded activities and beneficiaries of HUD- funded activities are not required to participate. 24 CFR § 578.87 (b)(2) | ⎕ Yes  ⎕ No  ⎕ n/a |  |
| **Transfer Due to Domestic Violence** | | |
| *1. If a program participant receiving tenant-based rental assistance has moved to a different CoC due to threat of imminent harm*, the file must contain documentation of the domestic violence and imminent threat. | ⎕ Yes  ⎕ No  ⎕ n/a |  |

**PART 2: FISCAL MONITORING**

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| **INTERNAL REVIEW** | | |
| **Audit** | | |
| 1. Is the agency subject to the OMB A-133 single audit requirement? (Required if $500,000 or more in aggregate Federal funds expended); | ⎕ Yes  ⎕ No |  |
| 2. If subject to A-133 audit, has the agency provided its most recent audit and management letter? | ⎕ Yes  ⎕ No |  |
| 3. If not bound by A-133 requirement, has the agency provided financial statements audited by a CPA? | ⎕ Yes  ⎕ No |  |
| **Board of Directors** | | |
| 1. Has the agency provided the CoC a list of the members of its Board of Directors? | ⎕ Yes  ⎕ No |  |
| **Match** | | |
| 1. The agency has documentation of the source and use of contributions made to satisfy the 25% match requirement (match may be cash or in- kind). Records must indicate the grant and fiscal year for which each matching contribution is counted. The records must show how the value placed on 3rd party in-kind contributions was derived. Costs incurred by a partnering organization to provide “in kind” services to the program participants must be documented by a MOU. Cash or any in kind contribution used as match for another grant is not an eligible match.24 CFR 578.73; 24 CFR 578.103(a)(10); 24 CFR 84.23; 24 CFR 578.23(c)(6) | ⎕ Yes  ⎕ No |  |
| 2. Match must be spent on eligible project costs. | ⎕ Yes  ⎕ No |  |
| 3. Where match is documented by MOU, the MOU must; establish the unconditional commitment; identify the service to be provided; identify the profession of the persons providing the service; and identify the cost of the service to be provided. | ⎕ Yes  ⎕ No |  |
| **Internal Controls** | | |
| 1. The agency has written job descriptions for all HUD-funded positions. | ⎕ Yes  ⎕ No |  |
| 2. The agency has written fiscal policies and procedures specifying approval authority for all financial transactions and guidelines for controlling expenditures | ⎕ Yes  ⎕ No |  |
| 3. The agency has written procedures for recording financial transactions, and an accounting manual and chart of accounts | ⎕ Yes  ⎕ No |  |

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| 4. Review organizational chart | ⎕ Yes  ⎕ No |  |

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| **DOCUMENTATION REVIEW** | | |
| **Space /Utilities Documentation/Leases** | | |
| 1. Rental or lease agreement – signed by participant; valid lease period; correct rental amount (move to leasing) | ⎕ Yes  ⎕ No |  |

# PART 3: HMIS MONITORING

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| **HMIS Operations; Policy and Procedures** | | |
| 1. The agency has signed an HMIS Participation Agreement. | ⎕ Yes  ⎕ No | |
| 2. The agency has designated HMIS Agency Administrator(s), who acts as the agency’s single point of contact for the HMIS Lead Agency. | ⎕ Yes  ⎕ No | |
| 3. The agency has ensured that each HMIS user within its agency has signed a user agreement and ethics policy stating full understanding of user rules, protocols and confidentiality. | ⎕ Yes  ⎕ No | |
| **Privacy** | | |
| 1. The agency has a Data Collection/Privacy Notice posted in English and Spanish at each intake location. | ⎕ Yes  ⎕ No | |
| 2. The agency has a written Privacy Policy or uses the CoC’s written Privacy Policy. | ⎕ Yes  ⎕ No |  |
| 3. The agency has and uses the updated CNYHMIS release of information form for any client for which the agency uses HMIS for data sharing. | ⎕ Yes  ⎕ No | |
| 4. The agency ensures that all signed forms are locked in a designated location with limited access to staff. | ⎕ Yes  ⎕ No | |
| 5. The agency has a written client complaint policy. | ⎕ Yes  ⎕ No | |
| 6. The agency has established a process of tracking all filed complaints and can provide copies of complaints and resolution to the HMIS Lead Agency if requested. | ⎕ Yes  ⎕ No | |
| **Security** | | |
| 1. Agency maintains a list of active HMIS users. | ⎕ Yes  ⎕ No | |
| 2. Agency regularly contacts the HMIS Lead when an employee leaves the agency, in order to make  sure that the person’s HMIS account is disabled | ⎕ Yes  ⎕ No | |
| 3. Does the agency have in place policies and procedures to protect hard copies (paper) with  personal identifying information? | ⎕ Yes  ⎕ No |  |
| **Data Quality** | | |
| 1. At a minimum agency collects the Universal Data Elements for every client entered and minimum data quality standards are met (i.e. HMIS Report Card) Grade is not lower than a B). | ⎕ Yes  ⎕ No | |
| 1. The agency enters All Client Entry Data into HMIS at a minimum within one week of intake. | ⎕ Yes  ⎕ No | |
| 1. Agency staff review monthly report cards received from HMIS Agency Administrator and addresses any issues noted. | ⎕ Yes  ⎕ No | |
| 1. Does the Agency participate in the HMIS Data Administrator Committee? | ⎕ Yes  ⎕ No | |
| 1. Does all Agency HMIS users attend HMIS training sessions (New User Training, Agency Administrator Training, Refresher Training, etc.)? | ⎕ Yes  ⎕ No | |
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## Part 4: MONITORING RESULTS

Program Fiscal HMIS

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| Is a follow-up visit necessary? | If so, date and time scheduled? |
| Date of monitoring report | |
| Date letter sent to subrecipient | |
| Other notes | |