



2019 Homeless Leadership Coalition OR-503 Continuum of Care (CoC) Internal Wellness Checklist

The Internal Wellness Checklist was developed in an effort to assist homeless providers to proactively implement its FY 19 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 should complete this checklist and include it with their application for renewal of funding.

Agency Name:		
Grant Program Name:		
Project Type:		
Current Operating Year:	Grant Start Date:	Grant End Date:
Primary Contact:	Name:	
	Email:	Phone:

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. Leasing- 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 https://www.govregs.com/regulations/expand/title24_chapterV_part578_subpartB_section578.7, and (2) Monitoring handbook 6509.2 REV-6 CHG-2:https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

I certify that the above information is true and complete. I understand and acknowledge that withholding information or providing false information may result in an increase in monitoring and audit activities conducted by the CoC and/or a designated representative.

Signature: _____ Date: _____

Typed/Printed Name: _____ Title: _____