



Continuum of Care Program

Start-Up Training



Training Housekeeping - Etiquette

When entering Skype – **Select the “Don’t join audio” option**

The audio portion of the training is a conference call. The call-in information is:

Number **1-888-330-1716** Access Code **6399068**

All participants will be in listen only mode – Please use the chat feature to ask questions. To access the chat feature, press this button



If we are unable to answer questions, we will provide follow-up responses to registrants. Please contact your CPD Representative for any additional clarifications.

Should we have time to answer questions, we will unmute all participants. At that time, we will ask you to mute your phones and only unmute to ask questions. If your phone does not have a mute feature, you may use *6 to toggle mute.



Other Program Requirements and Grant Administration



Project Changes



Significant Changes

Significant changes require HUD approval through a formal grant amendment (24 CFR 578.105)

For CoCs with only one recipient and UFAs, significant changes are:

- Change of recipient
- A shift of more than 10% of the amount awarded for one eligible budget category to another budget category
- Permanent change in the subpopulation served
- Permanent reduction in the total number of units



Significant Changes

- Significant changes require HUD approval through a formal grant amendment

For CoCs with more than one recipient, significant changes are:

- Change of recipient
- A shift of more than 10% of the amount awarded for one eligible budget category to another budget category
- A reduction in the number of units
- A change in the subpopulation served
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project



How to Request an Amendment

- For significant changes, UFAs and recipients should:
 - Prepare a detailed, written request to the local HUD CPD Field Office
 - Explain the reason for the change
 - Justify same or better level of service will be provided
 - Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

NOTE: It's also a good idea to discuss all changes with your CoC since UFAs are required to get the CoC's approval before submitting



Minor Changes

- For minor changes, the recipient must:
 - Fully document any changes
 - Notify the Field Office of the change so LOCCS and other reporting systems can be adjusted
 - Maintain documentation and make it available to HUD during monitoring and compliance reviews or upon request



Timeliness Standards



Timeliness Standards: Initiating Projects

- Recipients must *promptly* initiate approved CoC Program-funded projects
 - Construction activities must begin within 9 months and be complete within 24 months
 - Activities that are dependent on the construction must begin within 3 months of construction completion



Timeliness Standards: Expenditures

- Once activities begin, recipients must draw down funds at least once per quarter
- Recipients may distribute funds to subrecipients in advance of expenditures
- Recipients must distribute funds to subrecipients within 45 days of receiving an approvable request



Operating Start Date and Program Year

- Operating start date sets beginning of 12-month program year for spending and reporting
 - New projects without acquisition or construction start the 1st day of month the recipient incurs eligible costs
 - New projects with acquisition or construction start the 1st day of month following completion of acquisition or construction
 - Renewal grants start the day after the end of previous grant term



Recordkeeping Requirements



Recordkeeping Requirements

CoC Records	UFA Records	Homelessness Status	At Risk of Homelessness Status
Records of Reasonable Belief of Imminent Threat of Harm	Annual Income	Program Participant Records	Housing Standards
Services Provided	Match	Conflicts of Interest	Homeless Participation
Faith-Based Activities	Affirmatively Furthering Fair Housing	Other Federal Requirements	Subrecipients and Contractors



Recordkeeping Requirements

- Recipients and subrecipients must:
 - Obtain documentation from qualified source(s) in accordance with the requirements of the interim rule
 - Maintain the records in your organization, project, and program participant files



Recordkeeping Requirements

- Confidentiality
 - All records containing protected information must be kept secure and confidential
 - The address or location of any program participant must not be made public
- Record Retention
 - All non-construction records must be retained for at least 5 years
 - Participant eligibility documentation must be retained for 5 years after final expenditure of relevant grant
 - Acquisition, new construction, or rehabilitation records must be retained for 15 years after the date the project site is first occupied



Monitoring of Compliance





Monitoring

- Purpose – To determine that grant activities are implemented in compliance with:
 - CoC Program interim rule
 - NOFA
 - Grant agreement - 24 CFR 578.23(c)(8)
 - OMB Supercircular and other programmatic guidance
- CoCs are responsible for monitoring recipient performance
 - CoC Program interim rule - 24 CFR 578.7(a)(6)
- Recipients must monitor subrecipients annually
 - CoC Program interim rule - 24 CFR 578.59(a)(1)(i)(D)
- Review can be remote or on-site



Recipients and subrecipients should monitor themselves at least annually. Excellent resource is the:

CPD Monitoring Handbook

which is located at

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

Section 29 of the Handbook contains the Continuum of Care Program monitoring exhibits.



Monitoring Areas

Program Participants	Program Components	Eligible Costs
Project Progress	Match Documentation	Subrecipient Management
Recipient Management	Financial Management	Cost Allowability
Procurement	Equipment and Equipment Disposition	Other Federal Requirements



Other Program Requirements



Coordinated Entry 24 CFR 578.7(a)(8)

- HUD requires that CoCs establish and operate a coordinated entry (CE) process—and that recipients of CoC Program and Emergency Solutions Grants (ESG) program funding within the CoC's area must use that CE process.
- The requirement was established in the CoC Program interim rule (24 CFR 578) and the Emergency Solutions Grants (ESG) interim rule (24 CFR 576).



Coordinated Entry Resources

- [HUD Coordinated Entry Notice CPD-17-01 – Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System \(2017\)](#)
- [Coordinated Entry Policy Brief \(2015\)](#)
- [Coordinated Entry Guidebook](#)
- [Coordinated Entry Self-Assessment](#)



Conflicts of Interest

- Procurement (24 CFR 578.95(a))
 - Must comply with codes of conduct and conflict of interest requirements under 2 CFR 200.317 and 200.318
 - The 2 CFR Part 200 Uniform Administrative Requirements apply to the competitive CPD program grants including the CoC Program.



Conflicts of Interest

- Organizational conflict (24 CFR 578.95(c))
 - Recipient/subrecipient is unable to render impartial assistance in the provision of any type or amount of assistance
 - Objectivity in performing work might be otherwise impaired
- Other conflicts (24 CFR 578.95(d))
 - No covered person, may obtain a financial interest or benefit from an assisted activity
- Code of Conduct for HUD Grant Programs
 - https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants



Participation of Homeless Individuals

- Recipients and subrecipients must document its compliance with the homeless participation requirement under 24 CFR 578.75(g)
 - Must provide for the participation of not less than one homeless or formerly homeless individual on the agency board or equivalent policymaking entity
 - Must involve homeless individuals and families in the creation and operation of the project



Other Program Requirements

Displacement,
Relocation, and
Acquisition

24 CFR 578.83

Uniform
Administrative
Requirements

24 CFR 578.99(e)

Fair Housing and
Equal Opportunity

24 CFR 578.93

Solid Waste Disposal
Act

24 CFR 578.99(b)

Section 3

24 CFR Part 135

Transparency Act
Reporting

24 CFR 578.99(c)

www.fsrs.gov



HUD Exchange Resources

- [HUD Exchange Website Home Page](#)
- [CoC Program Page](#)
- [CoC Program Toolkit Page](#)
- [Frequently Asked Questions – CoC Program](#)
- [Ask A Question](#) on HUD Exchange
- [Join a Mailing List](#) on HUD Exchange
- [CoC GIS Tools](#)



Equal Access Rule



- Both the 2012 and 2016 Equal Access Rules are in effect.
- All projects that receive HUD funding must be in compliance with both rules.
- HUD continues to support implementation of these rules, enforce non-compliance, and assist projects to come into compliance.



What is the Equal Access Rule?

- Ensures that lesbian, gay, bisexual, and transgender people are guaranteed equal access to HUD's housing and shelters.
- Clarifies the term "family" and "family unit", as used in the HUD programs (see <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>)
- NOTE: The Fair Housing Act also prohibits discrimination based on gender identity that does not conform to an individual's sex assigned at birth. See more information at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/LGBT_Housing_Discrimination
- Download TA materials:
 - <https://www.hudexchange.info/homelessness-assistance/resources-for-lgbt-homelessness/>



Amended Equal Access Rule

- Published on September 21, 2016. Effective on October 21, 2016
- Requires that policies and procedures to protect privacy, health, safety, and security, shall be established or amended, as necessary, and administered in a nondiscriminatory manner to ensure that:
 - Equal access to all CPD programs is provided in accordance with gender identity;
 - In single-sex facilities, individuals are placed, served and accommodated in accordance with one's gender identity; and
 - Individuals are not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity.
- Plus non-discriminatory steps must be taken to address privacy concerns, including updating operating policies and procedures.



Non-Discrimination: Measuring Agency Compliance

1. Agency has an anti-discrimination policy?
2. The anti-discrimination policy includes gender identity, gender expression and sexual orientation in the list of attributes protected from discrimination?
3. Agency staff, volunteers and contractors are trained on the policy?
4. Agency has clear sanctions/consequences for staff, volunteers or contractors that violate the policy?
5. Agency has clearly established expectations around ensuring any language or actions that are identified as harassment are consistently enforced by staff with clients?



Non-Discrimination Policy Pointers

Comprehensive	Prohibit discrimination based on gender identity, sexual orientation, and marital status, along with other protected classes under Fair Housing Act and other Federal, state and local civil rights laws
Clear:	Contains easy, clear procedures for training staff and volunteers about behavior and treatment that is prohibited at the shelter
Transparent:	Must be communicated to clients at intake
Agreed Upon:	Clients sign anti-discrimination policy
Public:	Post publicly and in plain language
Enforced:	Complaints of discrimination must be investigated and responded to immediately



Training Staff and Volunteers

Training of staff across the various points in the system should always include:

- Language and terms
- Prohibited behaviors (what does the law say)
- Agency-specific anti-discrimination policy and procedures
- Modeling correct behavior (staff training scenarios)
- Staff-level tactics to support a safe and inclusive experience for all people



HUD Priorities



FY 2017 HUD NOFA Policy Priorities

- Ending homelessness for all persons
- Creating a systemic response to homelessness
- Strategically allocating and using resources
- Use a Housing First Approach



Ending Homelessness

- [SNAPS In Focus: Ending Homelessness in Rural America](#)
- [SNAPS In Focus: Preventing and Ending Youth Homelessness](#)
- [CoC Competition Focus: Ending Veteran Homelessness](#)
- [SNAPS In Focus: Addressing the Needs of Persons Fleeing Domestic Violence](#)



Measure System Performance



HUD System Performance Measures

- Length of Time Homeless
- Returns to Homelessness
- Number of Individuals or Families Experiencing Homelessness
- Employment and Income Growth (CoC Program-funded Projects only)
- Persons Who Become Homeless for the First Time
- Homeless Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definition (CoC Program-funded Projects only)



HUD System Performance Measures

- Successful Placement from Street Outreach
- Successful Placement in or Retention of Permanent Housing



Performance Measurement To Dos

Focus on:

- Improving HMIS data quality
- Generating and testing system performance data
- Reviewing and understanding the data

Carefully review resources to diagnose and improve system performance:

- [HMIS Review for System Performance Measures](#)
- [CoC Data Quality Brief](#) 
- [System Performance Improvement Briefs](#) 



Additional Guidance and Resources

- [Introductory Guide](#)
- [System Performance Measures in Context](#)
- [SPM Videos](#)
- [System Performance Measure FAQs](#)
- [System Performance Measures Tools](#)
 - [System Performance Measures HMIS Programming Specifications](#)
 - [System Performance Measures Table Shells](#)



Housing First



Housing First Components

- Few or no barriers to admission
- Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
- Tenants have full rights, responsibilities, and legal protections
- Practices and policies to prevent lease violations and evictions
- Applicable in a variety of housing models



Housing First Commitment

Housing First



If you checked the Housing First box on your CoC Program NOFA application, you are committed to operating your project using Housing First principals.



Housing First Resources

- [CoC Competition Focus: Housing First](#)
- [SNAPs Focus: Why Housing First](#)
- [SNAPs Weekly Focus: Adopting a Housing First Approach](#)
- [Housing First in Permanent Supportive Housing Brief](#)



HMIS and Data Quality



HMIS

- Homeless Management Information System (HMIS)
 - Locally operated
 - CoC responsibility
 - Complies with HMIS Data Standards
- HMIS is the source for many reports, including the Annual Performance Report (APR) and System Performance Measures
- Data in HMIS are collected about projects and clients



2017 HMIS Data Standards

- Implementation Timeline
 - Federal Partners (HUD, VA, HHS) met in early 2017
 - Software vendors were briefed and given specifications in April
 - HMIS Leads and System administrators were briefed in May
 - All HMIS and comparable database systems must be updated to the new 2017 Data Standards by October 1, 2017.
- Updates to relevant documents will be posted to the [2017 HMIS Data Standards](#) page on the HUD Exchange as they become available



Gender (Element 3.6)

- New wording for response options:
 - Female
 - Male
 - Trans Female (MTF or Male to Female)
 - Trans Male (FTM or Female to Male)
 - Gender Non-Conforming (i.e. not exclusively male or female)
 - Client doesn't know
 - Client refused
 - Data not collected

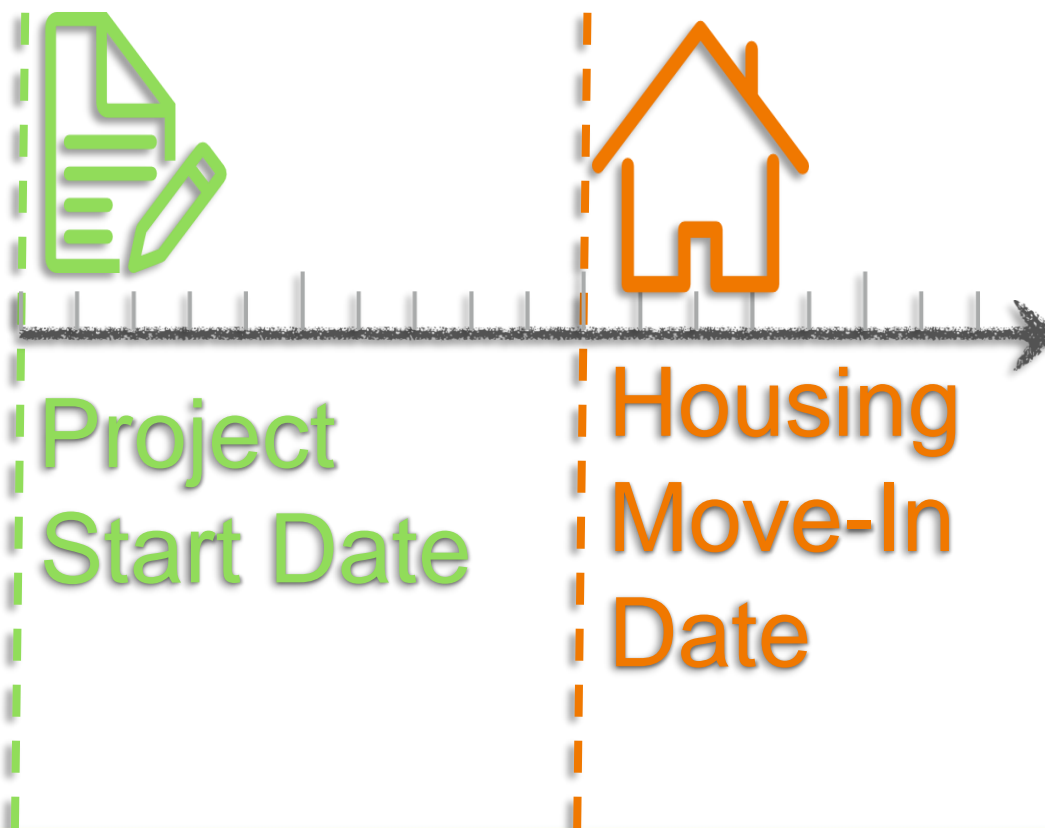


Project Start Date and Housing Move-In Date (Elements 3.10 and 3.20)

- Project Entry Date is being renamed to Project **Start** Date
 - More accurate terminology to be inclusive of PH projects
- Residential Move-In Date
 - Renamed to **Housing** Move-In Date
 - Applies to ALL PH projects (formerly only applied to RRH)



Project Start Date and Housing Move-in Date – All PH Projects





Disability-related elements (Elements 4.5 through 4.10)

- Disability information itself remains very important to collect in HMIS, however, HUD has dropped the requirement to collect certain disability-related elements
 - You no longer need to indicate in HMIS if you have documentation of a disability on file
 - You no longer need to indicate in HMIS if a client is currently receiving services/treatment for a noted disability



Project Set-Up

- Proper set up of data collection workflows in your HMIS software is crucial to accurate reporting, i.e. if the data does not go into HMIS correctly, the data will not come out correctly
- Speak to your HMIS System Administrator
- Meet with staff to review data collection stages and data elements
- Ensure common understanding of data elements and common agency practice for collecting and entering data for each stage of data collection
- Create/update data collection forms and procedures



HMIS Privacy

Work continues on updating the HMIS privacy requirements, originally written in 2004

Key points:

HUD does not require client consent for HMIS participants to collect and enter client data into HMIS

HUD does require client consent for HMIS participants to share information with other HMIS participating agencies via HMIS

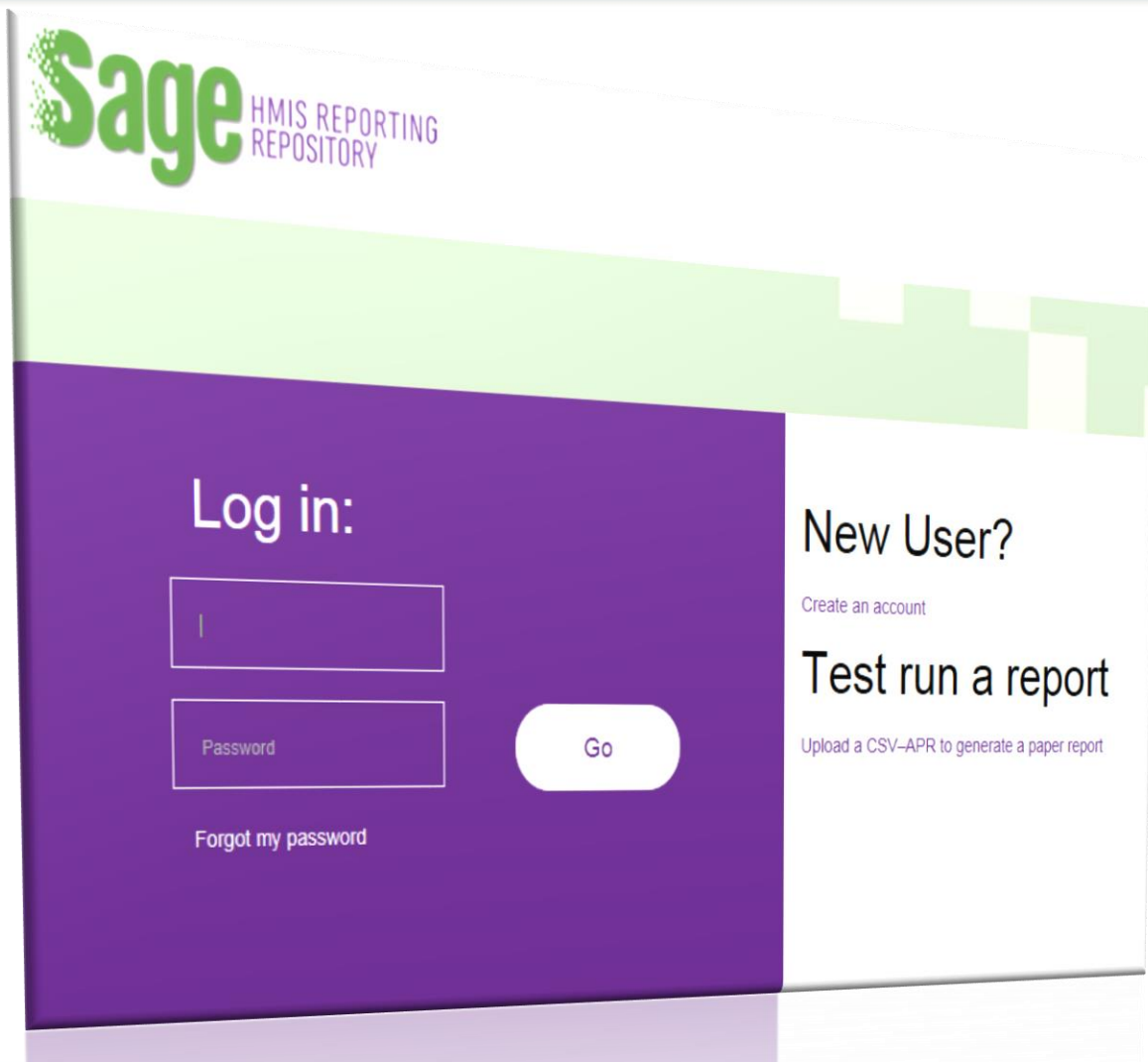
Therefore, if an HMIS is configured to automatically share information among participants, participating agencies should obtain client consent prior to data entry or enter data in a way that prevents automatic sharing



- April 1, 2017
- Annual Performance Report (APR)
- Web-based reporting system
- <https://www.sagehmis.info/>



Annual Performance Reports



- Create an Account
- Complete the report in the system
- Submit the report in the system
- HUD rep reviews



Annual Performance Reports

Recipients with HUD funding received through CoC homeless assistance grants (e.g., Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation Single Room Occupancy Program, CoC Program) are required to submit an Annual Performance Report (APR) electronically to HUD every operating year. Data collection for the APR is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards. The APR must be submitted in Sage no later than 90 days after the grant's operating year ends.



Annual Performance Reports

Guides and Tools

[Sage CoC APR Guidebook for CoC Grant-Funded Programs](#)

The Sage CoC APR Guidebook is intended to assist with the data entry into Sage for all CoC recipients, including recipients of funds under the CoC Program, Supportive Housing Program (SHP), Shelter Plus Care (S+C), and Section 8 Moderate Rehabilitation Single Room Occupancy (SRO).

[CoC APR: Sage HMIS Reporting Repository Templates](#)

To help users understand what they will be reporting in the Sage HMIS Reporting Repository, HUD has published several templates. These templates allow users to know what data they are reporting in Sage. It is not intended to replace electronic data collection in Sage.



Annual Performance Reports

CoC Full APR	15
APR Step 1: Grant Information	15
APR Step 2: Bed and Unit Inventory and Utilization	19
APR Step 3: Contact Information	21
APR Step 4: Financial Information	21
APR Step 5: Performance Accomplishments	21
APR Step 6: Additional Comments	22
APR Step 7: CSV APR Upload.....	22
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HUD Review	27





Annual Performance Reports

- Most of the information for the APR is generated via the CSV-APR Report generated from HMIS
- Following approval of the APR by HUD, the grant is closed



Thank You!

