

CoC Rental Assistance Program Policies and Procedures

Introduction

The Housing Authority of the County of Contra Costa's (HACCC) Continuum of Care Rental Assistance Program (CoC-RAP or RAP) is designed to link rental assistance with supportive services for homeless persons with disabilities (primarily chronic mental illness, substance abuse and HIV/AIDS) and their families. CoC-RAP is one of the few programs administered by HACCC in which applicants do not come from one of the agency's wait lists. Instead, CoC-RAP applicants are referred via the Coordinated Entry System (CES).

CoC-RAP is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, as amended by S.896, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Current regulations governing CoC programs are found in the CoC Program Interim Rule at 24 CFR part 578.

24 CFR part 578.1 of the CoC Program Interim Rule states the primary purpose of the CoC Program is to:

1. Promote community-wide commitment to the goal of ending homelessness.
2. Provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.
3. Promote access to, and effective utilization of, mainstream programs by homeless individuals and families.
4. Optimize self-sufficiency among individuals and families experiencing homelessness.

Administrative Structure

HACCC is the grant recipient for the CoC-RAP funds and is responsible for the overall management of the program. HACCC's primary service partner for the program is HOPE Solutions, while Contra Costa County's Health, Housing and Homeless Services Division (H3) provides entry to the program along with matching services.

HACCC is responsible for: (1) developing and implementing CoC-RAP policies and procedures in accordance with HUD's regulations and guidance; (2) managing all aspects of the participants' housing assistance, including conducting eligibility determinations, annual recertification's, inspections, calculating tenant rent and HAP payments, and paying landlords; (3) managing grant funds, including informing partners when a new certificate can be issued and conducting monthly draws through HUD's LOCCS system; (4) maintaining relevant data on program participants; (5) coordinating with HOPE Solutions and any other service provider agencies providing services to CoC-RAP participants; (6) monitoring the accuracy of the information

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supplied by H3, HOPE Solutions and any other service providers, and (7) maintaining client's information confidentially and securely.

HOPE Solutions is responsible for services such case management and housing search assistance, entry, and maintenance of information in HUD's HMIS system as well as compiling HUD's Annual Progress Report (APR).

H3 administers the CoC's CES. The CES determines initial applicant entry to the CoC-RAP program. H3 is also responsible for providing the required 25% service match for the CoC-RAP program. The match will be provided via mental health, medical and emergency services provided by the County to CoC-RAP participants.

Governing Documents

Where CoC-RAP utilizes policies and procedures that are the same as those documented in the Housing Choice Voucher Administrative Plan (Admin Plan), such as the rules governing housing quality standards inspections, HACCC will utilize the policies and procedures laid out in the Admin Plan. If there is a conflict between the CoC program regulations and the Admin Plan, the CoC program regulations have precedence.

In addition to the CoC-RAP Policies and Procedures herein, HACCC's RAP program is governed by HOPE Solutions' Continuum of Care Rental Assistance Program (Shelter Plus Care) Policies and Procedures. This document was developed in conjunction with HACCC. HOPE Solutions' policies and procedures for RAP will be amended to this document and are thereby included as part of HACCC's program. As with the Admin Plan, the only exception would be where there is a conflict between any of HOPE Solutions' policies and procedures and HACCC's or with HUD's regulations. In the first case, the Admin Plan would have precedence, in the second, the CoC program regulations would take precedence.

The Admin Plan is approved by the Board of Commissioners (BOC) at least annually and the RAP Policies and Procedures will be included as an amendment to that document.

Fair Housing and Equal Opportunity Policy

HACCC and any CoC-RAP service providers will abide by HACCC's Fair Housing and Equal Opportunity Policy detailed in Chapter 2 of the HCV Administrative Plan as well as all applicable laws and regulations.

Where a RAP recipient encounters a condition or action that impedes fair housing choice, HACCC will provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan.

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Reasonable Accommodation Policy

HACCC's Reasonable Accommodation Policy, detailed in Chapter 2 of the Admin Plan will apply to RAP.

Participation of Homeless Individuals on HACCC's Board

HUD regulations at 24 CFR 578.75(g)(1) and 24 CFR 578.75(g)(2) require the participation of homeless individuals on the policymaking body for the CoC-RAP grant. Specifically, they say the following:

(1) Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and subrecipient of assistance under this part must, to the maximum extent practicable, involve 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.

However, CA state law dictates the composition of HACCC's Board. Specifically, the CA Health and Safety Code includes what is known as the Housing Authorities Law. Among other things, the Housing Authorities Law dictates the composition of a housing authority's Board of Commissioners (BOC). For a County, the law says the following:

34271. When the governing body of a county adopts such a resolution it shall appoint five persons as commissioners of the authority. The governing body shall appoint two additional commissioners who are tenants of the authority if the authority has tenants, or within one year after the authority first does have tenants. One such tenant commissioner shall be over 62 years of age if the authority has tenants of such age.

The amendments to this section enacted by the Legislature at the 1975–76 Regular Session shall not affect the office of any commissioner of a housing authority, which on January 1, 1976, has seven commissioners, but the successors to the two additional commissioners appointed pursuant to the changes in this section which were made by Chapter 120 of the Statutes of 1972 or Chapter 545 of the Statutes of 1974 shall be tenants of the authority and one shall be over 62 years of age if the authority has tenants of such age.

(Amended by Stats. 1975, Ch. 611.)

CA law, therefore, restricts HACCC's BOC to seven commissioners. No more, no less.

Because the County Board of Supervisors (BOS) has appointed themselves as HACCC's non-tenant BOC members, HACCC cannot recruit specifically for a homeless/formerly homeless person to sit in one of these seats on the BOC. Likewise, because CA state law requires that any of HACCC's tenants can sit on

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the BOC (provided one is over 62 years of age), HACCC cannot recruit specifically for a homeless/formerly homeless person to sit in one of these seats either.

As a result, HACCC will do its best to solicit tenant Commissioners who have experience with homelessness. If HACCC has no BOC members who have experience with homelessness, HACCC will seek a HUD waiver to this requirement. The regulation states that the requirement to have a “homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity” can be “waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.”

Both the Council on Homelessness (which governs the CoC) and HOPE Solutions’ Board have members who are either homeless or previously homeless.

Application Process

HACCC does not accept applications for the CoC-RAP program. All CoC-RAP applicants will be referred via the CoC’s Coordinated Entry System to HOPE Solutions and, if eligible and there are RAP funding available, HOPE Solutions will then refer that applicant to HACCC.

A. HACCC will receive the following documentation from HOPE Solutions:

1. A completed CoC application form;
2. Signed Verification of Homelessness along with documentation certifying the applicant’s homelessness status;
3. Documentation of a disabling condition which is substantiated by a doctor or licensed clinician.
4. Income verification for all adults in the household;
5. Photocopy of unexpired identification and social security card for all adults;
6. Signed Program Agreement;
7. Signed Consent and Authorization for the Release of Information;
8. Current Service Plan.

B. Upon receipt of the referral application, the CoC Manager will:

1. Log the receipt of the referral and supporting documents in Yardi
2. Review the application to confirm eligibility (see " Eligibility Determination and Approval")

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3. Refer the applicant to the Housing Authority of Contra Costa County (HACCC) for the issuance of a CoC certificate (not a voucher) (see "Leasing Procedures").
4. Coordinate with agencies and persons involved in the participant's housing search and placement into housing, including Housing Authority staff.

Referrals will only be accepted from HOPE Solutions via the CES. There are no "self" referrals to the program, or referrals from any other agency. Referrals can be submitted by either secure email or fax to HACCC.

Eligibility Determination and Approval

Eligibility determinations are made by HACCC's Director of Assisted Housing or a designee. The Director or their designee will review each referral for completeness and will determine eligibility based on the following factors:

- i. Verification of homelessness (completed and signed Homeless Verification form);
- ii. Qualifying disability (completed and signed Disability Verification form and/or SSA award letter);
- iii. Verification of income eligibility (review of income verification documentation, such as benefits letter, pay stubs, letter from employer);
- iv. Signed Service Provider Agreement between participant and HOPE solutions or any other eligible service provider.

HACCC may review the information in the applicant's referral materials to assess their ability to live independently. HACCC may require adjustments to the applicant's service plan that support the applicant's ability to navigate RAP successfully.

Certificate Issuance

Eligible RAP applicants will be given a briefing that covers the rules of the program, how rent is calculated, tenant responsibilities, etc. Applicants will then be issued a Request for Tenancy Approval and issued a certificate with a 60-day timeline to find rental housing. The 60 days begins on the date of the briefing. If the applicant is unable to find housing during this initial period, they can receive an extension for an additional 60 days provided they have maintained contact with their housing navigator and they have actively been seeking housing.

RAP certificates may be extended beyond 120 days if the client continues to follow their service agreement and actively seeks housing. If a client asks for more than 120 days to find housing, they will be referred to HACCC's CoC Manager for approval of their request. HACCC's CoC Manager will verify whether funding is still available, and if the client is following their service agreement and actively seeking housing. The CoC Manager or their designee will give a written response to the extension request.

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Rental Assistance and Leasing Policies and Procedures

CoC-RAP assistance is in the form of a certificate, not a voucher. The certificate is not portable outside of Contra Costa County (moves to Pittsburg are allowed).

HACCC will calculate tenant rent as outlined in HUD Notice CPD-96-03 and 24 CFR Part 5 and 578. The rental subsidy is based upon the monthly income of the household. The household will contribute approximately 30% of their adjusted income for rent or a \$50.00 minimum rent, whichever is higher. HACCC staff will verify each household's income and determine the amount of their rental obligation. Both the participant's portion of the rent and HACCC's subsidy portion of the rent are paid directly to the landlord.

Eligible Units

RAP clients will rent units in the private market that meet the following guidelines:

1. All units assisted by CoC program funds must meet applicable housing quality standards (HQS) under 24 CFR 982.401. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspections. All units must be inspected at least annually to ensure compliance with HQS.
2. Dwelling units must be of suitable size for the household. The dwelling unit must have at least one bedroom for each two persons. Other allowances will be made as documented in HACCC's Admin Plan.
3. The rent charged for dwelling units must be deemed reasonable in relation with comparable unassisted units. A reasonable rent is determined by considering location, size, type, amenities, facilities, and the management and maintenance of each unit.

Lease

RAP participants must enter into an initial lease agreement for a term of at least one year. Per state law, leases will be automatically renewed, upon expiration, monthly unless the property owner and participant sign a new, longer-term lease.

Security Deposits

Property owners can request a security deposit in accord with state law. CoC-RAP grant funds may be used for security deposits (24 CFR 578.51 (a) (2)). RAP participants may receive a one-time only grant from HACCC to cover up to one month's rent of their security deposit. If a participant needs help paying their security deposit, their service coordinator will assist them with a written request to HACCC for a security deposit grant. HACCC's RAP staff will review the grant request. If granted, the payment will be made directly to the landlord. In the event the

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client relocates, the landlord shall make the deposit refund payable to the client. The client will be responsible for any subsequent security deposit requirements.

Household Composition

Participants must submit a written request to HACCC if they wish to add household members apart from those who were approved with the participant's initial application. Other than the birth of a child after their enrollment in RAP, any requests from participants to add individuals to their household must be approved by HACCC.

To be approved to add additional persons to the household, the client must be in good standing in the program, and the additional person(s) must be related by blood, marriage (including significant others/domestic partners, etc.), or operation of law. HACCC may require the household to substantiate a stable relationship that has existed for at least six months with the individual(s) they are requesting to add. Prior to approving a request to add someone to his or her household, HACCC will require the participant to provide a letter of support for the addition from their primary service provider. If the participant is currently under a lease agreement, the participant must also obtain the approval of their landlord to add more household members to their lease, and they must provide all the required documentation to HACCC for the new household members, including identification, proof of income and satisfactory completion of all requirements for the change in household composition as detailed in HACCC's HCV Administrative Plan.

Live-in Aide

A live-in aide will be permitted where needed by a RAP participant. HACCC will follow the procedures laid out in its Admin Plan when considering live-in aide requests. The Participant's Service Coordinator and the landlord/property owner must also agree to the request. The live-in aide will not have any rights to the RAP certificate if the participant(s) leaves the program for any reason.

Annual Recertifications

Income verification and household composition will be reviewed at least annually. The process will follow the recertification process outlined in the Admin Plan. Adjustments to the Participant's contributions towards rent will be made as changes are identified.

Requests to Relocate

RAP participants are expected to remain in a unit for at least 12 months before they can transfer to another unit. Exceptions will be made for VAWA or other instances where there are serious safety concerns, for problems with the participant's unit which are out of the participant's control, in response to approved reasonable accommodation requests, in the event that there are changes in the participant's household that change the bedroom size of their RAP certificate, or where there is mutual agreement between the property owner and the client to terminate the lease.

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HACCC must approve any participant's request to relocate prior to the participant being issued a transfer certificate. Approval of a transfer will be conditional upon verification that the client is participating in their service plan and is otherwise in good standing in the program.

Temporary Leave for Treatment

Participants may choose to retain their unit for up to 90 days while they complete a residential treatment program. The rental assistance will be provided for up to 90 days, and the participant will remain obligated for paying their portion of the rent.

Survivor Benefits

If a RAP participant dies and there are surviving members of the household over the age of 18, rental assistance will be provided for up to 90 days. During this period, a determination will be made as to whether a surviving household member qualifies for ongoing assistance under RAP. If one or more of the surviving members can provide verification to HACCC/HOPE Solutions that they meet the disability criteria and are willing to receive appropriate services, they will have the opportunity to be enrolled in the program and continue to receive the RAP rental subsidy. If they do not qualify for RAP, HACCC will notify the surviving member(s) that the RAP assistance will be terminated 30 days after this determination has been made. Live-in aides are not considered surviving members of the household and are not eligible to receive continued assistance under RAP.

Stable Income Requirement

As part of their required service plan, RAP Participants are expected to develop a plan for obtaining and/or maintaining a stable income to help ensure their long-term housing stability. If a RAP participant loses their income source(s), their Service Coordinator will follow-up with the participant to update their plan.

Outstanding Debt

When a client has an outstanding debt to any housing authority from a previous tenancy, the debt must either be paid in full before the client can be enrolled in RAP program or the client must be receiving services such as money management to assist them in fulfilling their financial obligations. They must also enter into, and continue to follow, a repayment agreement with the housing authority to which they owe money.

If a client incurs debt to HACCC while enrolled in RAP, a payment plan must be negotiated. Claims for damages at one property must be settled before a client will be allowed to transfer to another unit.

Service Coordination

HOPE Solutions serves as RAP participant's primary support service coordinator. HOPE Solutions' Continuum of Care Rental Assistance Program (Shelter Plus Care) Policies and

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Procedures outlines the approach that will be used in providing supportive services to RAP clients.

HOPE Solutions' Service Coordinators are responsible for notifying HACCC in a timely manner when concerns arise regarding a client's behavior that may jeopardize their housing, including when the client is no longer participating in services and has not responded to outreach efforts for more than 30 days.

All exchanges of information about program participants between agencies and housing providers must comply with applicable Federal, State, and local statutes, ordinances, regulations, and requirements. Upon enrollment into the program, each participant must sign a Release of Information permitting both HACCC and HOPE Solutions staff to communicate freely as needed to provide housing and services via RAP. This will also include the ability of both HOPE Solutions and HACCC to collect information concerning match from Contra Costa Health Services.

Terminations and Appeals

Policies and procedures concerning termination of RAP clients and their appeal rights are outlined in HOPE Solutions' RAP Policies and Procedures. RAP participants may appeal such decisions made by HOPE Solutions to HACCC. In considering such appeals, HACCC will first rely on staff to conduct an administrative review. If the situation warrants, or if the client wishes to appeal HACCC's decision, a hearing with HACCC's outside Hearing Officer will be scheduled. The Hearing Officer's decision will be final.

Financial Management

Financial management for the Continuum of Care (CoC) program will be the responsibility of HACCC's Finance Department (FD). HACCC utilizes software developed by YARDI. This software allows for accounting by grant and by program. All accounting functions are fully integrated – receivable, payable, payroll, and general ledger adjustment.

FD staff consists of the Chief Financial Officer, Management/Financial Analysts, an Accounting Supervisor, and several Senior Account Clerks. The Senior Account Clerks report to the Accounting Supervisor. The Accounting Supervisor and the Management/Financial Analysts report to the Chief Financial Officer. The Chief Financial Officer reports to the Executive Director. All members of the FD have the skills, knowledge and experience to perform the duties of their position. Not all members of the FD have duties that include activities of the CoC program.

The purpose of HACCC's CoC program is to provide rental assistance to eligible participants of the program. The budget line items applicable to the HACCC's CoC program are:

- Rental Assistance (approx. 92%) – both tenant-based and project-based
- Supportive Services (approx. 7%) – provided through a subrecipient

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- Administrative Costs (approx. 4%)

Activities performed by the Finance Department for the CoC program are as follows:

A. Grant tracking (typically performed by the Management Analyst):

1. The Finance Department receives notice from the Executive Department of the existence of a new CoC grant.
2. Spreadsheets are developed to track grant activity.
3. Activity is tracked for each grant.
4. Regulations are reviewed to determine eligible costs. 24 CFR 578 Subpart D.
 - (i) Rental assistance consists of (1) HAP payment made to landlords on behalf of program participants, (2) utility reimbursement payments made to program participants, (3) tenant security deposits, (4) vacancy loss, (5) damages, (6) office supplies directly related to carrying out the rental assistance activities, and (7) staff costs directly related to carrying out the rental assistance activities eligible under 24 CFR 578.51.
 - (ii) Supportive services consist of (1) case management services necessary to assist program participants obtain and maintain housing, (2) office supplies directly related to carrying out the supportive services, (3) staff costs directly related to carrying out the supportive services activities eligible under 24 CFR 578.53, and (4) other allowable costs as described in 24 CFR 578.53.
 - (iii) Administrative costs consist of (1) planning activities, (2) general management, oversight and coordination, and (3) overhead. The Authority maintains its books of accounts under HUD's Asset Management directives, utilizing the central office cost center (COCC) model. As such, the staff costs of supervisory positions are expensed to the COCC. A portion of these COCC costs are allocated to the CoC program based on its proportion of direct salary charges. Overhead is charged to the CoC program up to, or less than, the budget allowed. Excess overhead costs, if any, are absorbed by the COCC.
5. Eligible costs are summarized by grant, month, budget-line-item (BLI), and description.
6. Monthly analysis is performed to determine the amount of grant funds necessary to be drawn.
7. On a regular basis, current leasing utilization and projected leasing availability is updated and provided to the HACCC CoC program staff for further analysis.

B. Eligible Cost monitoring: The Finance Department refers to the signed CoC grants to determine the allowable activities for each grant. Subsequently, 24 CFR 578 Subpart D,

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which defines possible CoC program component and eligible costs, will be referenced to determine eligible costs for each activity. HACCC has elected not to use the 10% de minimus indirect cost rate allowed under the Uniform Guidance. The various types of costs will be monitored as follows:

1. RENTAL ASSISTANCE BLI

- a. Monthly rental assistance – Rental assistance consists of payments made on a monthly basis to landlords on behalf of the CoC participants. Rental assistance may also include utility allowance payments made directly to CoC participants. These payments are determined by the HACCC’s CoC program staff utilizing the HACCC’s YARDI software. Calculations are prepared no less frequently than annually. The HACCC’s CoC program staff collect information from the CoC participant regarding their income and household composition. Using this information, the monthly rental assistance amounts are calculated. The software is 50058 driven. Information is put into the Yardi system and a 50058 is generated. The 50058 is approved by the HACCC CoC program staff. Staff in the position for less than 12 months must have the 50058 approved by a supervisor. More experienced staff approve their own work. Once an approved 50058 enters the system, the Finance Department has authorization to pay the monthly rental assistance.
- b. On a monthly basis, the Senior Account Clerk responsible for CoC program rental assistance payments, generates a subsidy report from the YARDI software. The report is reviewed for unusual entries, unusual dates, new landlords, etc. Holds are placed on unusual entries, with no supporting documentation. HAP are processed. Check or EFT registers are reviewed and approved by the CFO. Prior to the release of the checks/EFTs, the Accounting Supervisor reviews the totals to determine cash flow. The Accounting Supervisor releases the EFTs. Checks are handed off to a service for mailing.
- c. Adjustment to monthly rental assistance – Occasionally rental assistance is processed for a period less than one month (move-in, move-out, other adjustment). These types of transactions are submitted to the Finance Department with further support approved by the HACCC CoC program staff. These transactions are processed and reviewed by Financial Department staff manually. Payment is held, if not properly supported and approved. These holds are placed on an electronic hold for the CoC program staff to review and correct. Meetings are held weekly to resolve discrepancies.
- d. The responsibilities of the mid-month rental assistance check/EFT runs are similar to the first-of-the-month runs. Please see number 1 above. These transactions will be further supported by the information as noted in the prior paragraph.

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- e. Security deposit assistance and property damage reimbursement – These transactions are less frequent. The CoC Program staff use a manual check request to begin the process for payment. The check request must be approved by appropriate CoC program staff. These transactions are processed and reviewed by Financial Department staff manually. Payment is held, if not properly supported and approved. These holds are placed on an electronic hold for the CoC program staff to review and correct. Meetings are held weekly to resolve discrepancies.
- f. The responsibilities of the mid-month rental assistance check/EFT runs are similar to the first-of-the-month runs. Please see number 1 above. These transactions will be further supported by the information as noted in the prior paragraph.
- g. Unit inspections – HACCC contracts with a third party to provide annual HQS inspections of the leased units. The portion of these invoices directly related to the CoC leased units is charged to these grants. These costs are considered part of the rental assistance BLI for these grants. The activity documented on these invoices is approved by the Director of Assisted Housing prior to payment by the Finance Department.
- h. The FD processes vendor checks on a weekly basis from properly approved and coded vendor invoices. Payments are not made from vendor statements. Check processing is conducted by one of several Senior Account Clerks. Processing is completed through check preparation, at which time the checks, along with all of the support, is handed off to the Accounting Supervisor or CFO for review. If one of the checks does not pass the review, the support is pulled and the check voided. Initials are placed on the payment summary report to document approval. The payment summary report is retained in a binder. Support for vendor invoices is filed by check number in the FD. Checks are handed off to a service for mailing.
- i. HACCC staff costs – A portion of staff costs is charged directly to the CoC grants. These costs are supported by timecards initiated by staff and approved by a supervisor. Staff directly charged to the program are typically those associated with the delivery of rental assistance and are charged to the rental assistance BLI. These staff members include those tasked with HAP payment processing and 50058 processing.
- j. Payroll is conducted by a Senior Account Clerk dedicated to payroll and payroll benefit processing. The Human Resource Officer works closely with the FD to communicate changes. Each employee is assigned to a home program to which their costs will routinely be charged. This home program is based on their job title and description. An employee can communicate work done out of their home program through the electronic time sheet processing system. Time sheets are approved by the employee and supervisor prior to

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submission to the FD for processing. Payroll processing is reviewed and approved by the CFO prior to payment. Further analysis is performed by the Management Analyst monthly.

2. ADMINISTRATION BLI

- a. HACCC staff costs – A portion of the costs associated with HACCC staff involved in the overall program management, coordination, monitoring, and evaluation are charged to the CoC grants. Staff assigned to administration have a portion of their costs charged to CoC grants according to the proportion of their CoC supervisory and administration responsibilities related to their other assigned programs. These costs are charged to the Administration BLI.
- b. Central office cost center (COCC) – A portion of HACCC’s COCC is charged to the CoC grants. The administration of HACCC is captured as costs of the COCC. A portion of these costs, based on the direct salary of all non-administrative staff members, is allocated to the CoC grants as overhead. These costs are associated with the administrative labor, systems, etc. provided by the central office to the HACCC’s programs. These costs are charged to the Administration BLI.
- c. Subrecipient administrative costs – HACCC contracts with a subrecipient to administer overall CoC program management, coordination, monitoring, and evaluation. The subrecipient requests quarterly reimbursement for the costs incurred for these services. These invoices are submitted to HACCC’s CoC program administrator for reimbursement through a quarterly billing process that includes summarized costs, system reports, and timecards. These invoices are reviewed for allowability, reasonableness, necessity to the program, compliance with agreements, and the adequacy of supporting documentation. A memo documenting the review done and the conclusions made with regards to payment request will be completed and attached to the invoice. The invoice is approved for payment only when sufficient support has been obtained. Once the invoice has been approved, it is submitted to the Finance Department for payment processing. These costs are charged either to the Administration BLI or Supportive Service BLI, as appropriate.

3. SUPPORTIVE SERVICES BLI

- a. Supportive services (when applicable) – Not all of the CoC grants contain authority to incur supportive service costs. These costs are typically incurred by the subrecipient and invoiced as noted above. These costs are incurred to address the special needs of CoC program participants. For more detail regarding the costs allowable under supportive services please see 24 CFR 578.53. Examples of costs include case management, mental health services, and utility deposits.

C. Grant draw process: Draws are the responsibility of the HACCC Management Analyst. Draws are conducted through the HUD LOCCS system. Draws are performed no less

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often than monthly. Draws are performed when supported by either specific payments of eligible costs or a full reconciliation of grant-to-date costs vs. grant-to-date draws. Draws are typically performed after costs have been incurred and disbursed. At no time are draws made and held more than 3 days prior to disbursement.

- D. Matching requirements and monitoring: 24 CFR 578.73 – match is required for all CoC program grant funds, except for leasing funds, in an amount of no less than 25%. HACCC does not engage in leasing activities. The majority of HACCC’s CoC grant funds are used for rental assistance. 24 CFR 578.49 defines leasing as the activity of leasing structure(s) to house participants. 24 CFR 578.51 defines rental assistance as allowing the participant to select housing within other specifications, such as size and geographical location. HACCC’s match is provided by the Contra Costa Health, Housing, and Homeless Services (H3).
1. At the beginning of each grant, HACCC enters into an MOU for Match with its subrecipient and H3 wherein the subrecipient agrees to provide no less than the 25% required matching from various forms of in-kind services. The types of services are stated in the agreement.
 2. The majority of these services are health services and mental health services provided by the County through their health care system. This system includes a County-run hospital, as well as a number of local clinics.
 3. On a quarterly basis, HACCC receives a match report from H3. This report shows match for the period compared with the maximum match required by the grant(s). The reports include a summary page, as well as detail. The detail page documents services provided on behalf of CoC program participants, fees for services provided, reimbursements received from other sources for the fees, and the final unreimbursed amounts for the services provided. The final unreimbursed amount is considered by the subrecipient to be counted as match for the grants.
 4. The funds used to cover the unreimbursed medical costs vary by type of service. Hospital fees are covered using the County’s general fund. Mental Health services are covered using funds from CalMHSA. Ambulance fees are covered using funds from the CCC Fire Protection District EMS.
 5. The Finance Department reviews this report for consistency, detail, and reasonableness. The report includes information easily verifiable by reviewing published fees for services. Other information is privileged by HIPAA regulations and is not easily verified.
 6. On an annual basis, the Finance Department will perform monitoring of the match reports supplied by the subrecipient. Monitoring will consist of randomly selecting services provided from the supplied list and tracing the amounts to more detailed documentation kept by the County. Sample size will be based on professional

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judgement. Sample size will be expanded if discrepancies are noted. See also the detailed Match Monitoring memo.

- E. Financial reporting: Annually the Financial Department reports financial information to HUD REAC in accordance with Uniform Financial Reporting Standards. This financial information includes the CoC program information under CFDA # 14.267. The CFO is responsible for the accuracy and timeliness of this reporting requirement.

Grant Administration

HMIS System

The Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. As a CoC grant recipient, HACCC is responsible for ensuring that participant data is entered into HMIS. For the RAP program, HOPE Solutions will enter all required data into HMIS on behalf of HACCC.

APR Submission

As required by 24 CFR 578.104(e) and 2 CFR Section 200.328(b), recipients of CoC grants must collect and report client data in an Annual Performance Report (APR). APRs are due to HUD 90-days after the grant period ends. APR data is compiled from the following sources:

- i. HMIS system (for data on participant demographics, income changes, and services received)
- ii. Service match documentation (for calculation of service match)
- iii. Participant case records (for tracking of participant outcomes)

As with HMIS submissions, HOPE Solutions will provide all required APR data to HUD on behalf of HACCC.

Environmental Review

As required at 24 CFR 578.31(a), the RAP program is subject to environmental review by HUD under 24 CFR part 50.

Additional Federal Requirements for PSH Programs

The following policies will be followed by PSH Programs as required by Federal Law.

Affirmatively Furthering Fair Housing

The RAP program will provide housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial

CoC Rental Assistance Program Policies and Procedures

status, or disability as detailed in 24 CFR 578.93(c) and will employ additional efforts to establish effective communication with persons with disabilities and persons with limited English proficiency.

HACCC and HOPE Solutions will provide any applicants or program participants who encounter a condition or action that impedes fair housing choice with information on the rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

Nondiscrimination and Equal Opportunity

HACCC will operate the RAP program in compliance with applicable civil rights laws, including the nondiscrimination and equal opportunity requirements in the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act. Further, in providing housing and services related to RAP, HACCC will not discriminate against a program applicant or participant on the basis of race, color, citizenship, national origin, ancestry, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or expression, marital status, source of income, genetic information, status as a survivor of domestic violence, or other reasons prohibited by law.

Compliance with Section 3 of the Housing and Urban Development Act of 1968

RAP participants will be included in HACCC's Section 3 program to the greatest extent feasible pursuant to 24 CFR 578 and 24 CFR 75.

Procurement

HACCC will retain copies of all solicitations of and agreements with contractors, as applicable, per Section 24 CFR 578.103(a)(16)(iii). This shall include records of all payment requests by, and dates of payments made to, contractors.

For the procurement of property (goods, supplies, or equipment) and services, HACCC will comply with the standards of conduct and conflict-of-interest requirements under 2 CFR 200.317 and 200.318.