



# **Kentucky Housing Corporation**

## **CoC and ESG Training FAQs**

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## General

- Q. Is it required to have a homeless person on the agency board of directors?**
- A. It is a requirement for ESG, COC, and S+C that agencies receiving these funds have representation from a homeless or formerly homeless person serving on the board of directors or in another policy making role within the organization.
- Q. Is an agency required to publicly disclose which member of the board is homeless or formerly homeless?**
- A. It is understandable that a person may not wish to be identified as being or having been homeless, however, because the funding source requires representation from this category, agency records must reflect how the requirement is being met. It is not required that this information be publicized, but must be provided upon request.

## Eligibility

- Q. When is it necessary to have documentation of a person's homelessness? We always have documentation for when the person applies for PSH and when the offer of housing is presented to the client and they begin the intake process. As it can take a number of weeks to locate an appropriate housing unit, is it necessary to have further documentation of where the person stayed the night before they are actually given the keys to the unit? For example: if they stay in a hotel or with family or friends for a night while they are searching for an apartment does this disqualify the person for housing?**
- A. HUD has provided the following guidance regarding documentation requirements for clients entering permanent supportive housing programs. In the past, HUD has required the documentation of homeless eligibility status the night prior to lease up. The new guidance allows clients to be temporarily housed in transitional programs, staying with friends or family after the initial homeless status is documented while they are locating and securing a unit without the need to re-document homeless status at the time of lease up.

From HUD: To be served in HUD's Homeless Assistance Programs, projects funded under the Continuum of Care (CoC) or Emergency Solutions Grants (ESG) Programs, a household must meet the eligibility criteria under the specific program and applicable component type. Staff must document a client's homelessness status at intake into the project, and should follow HUD's stated preferred order for documentation (see section 578.103(a)(3) for more information about recordkeeping requirements for documenting homeless status in the CoC Program interim rule and section 576.500(b) in the ESG Program interim rule).

HUD understands that once a household has been determined eligible and enrolled in a CoC Program-funded permanent housing program, including both rapid re-housing and permanent supportive housing, a unit is not always immediately available—sometimes because the waiting lists are too long or because of the things that must be accomplished to secure a unit (e.g., HQS

review or application processing). Communities should be continuously working to improve the system to decrease the amount of time that it takes to secure permanent housing, however, HUD acknowledges that these types of improvements take time.

Therefore, HUD has determined that during this interim period after enrollment but before an appropriate unit has been identified and approved the household will generally continue to reside in an emergency shelter or on the streets, prolonging their period of homelessness. If, during this time, the household is able to spend a few nights with a friend or family or in a hotel or motel, their homeless status (or chronically homeless status, if applicable) and eligibility for the permanent housing program in which they have already been enrolled would not change. If the program participant is not able to wait for the permanent housing placement with a family or friend, and a transitional housing bed (from any funding source) is available, then HUD would allow the program participant to be housed temporarily in that bed while a permanent housing unit is identified. Further, persons that were documented as chronically homeless at the time of intake and enrollment into the permanent housing project, can continue to be considered to be chronically homeless status while they wait for their permanent housing unit.

In addition to working to decrease the length of time it takes to locate and house a program participant in a permanent housing unit, HUD expects for CoCs to be routinely reviewing their portfolio of homeless assistance housing options to ensure that the supply reflects the need. This means that if a CoC recognizes that it has many homeless persons that are eligible for permanent supportive housing, for example, but they have more transitional housing available, then they should seriously consider developing a reallocation strategy that would allow them to reduce the number of transitional housing options in favor of creating more permanent supportive housing. HUD recognizes that this takes time and therefore is offering CoCs this flexibility, when the criteria above has been met, so that homeless persons have an alternative to sleeping on the streets when waiting for housing placement that won't jeopardize their eligibility.

HUD encourages CoCs and recipients to follow a Housing First approach and establish policies and procedures that reduce barriers to obtaining a unit and allow recipients to identify and certify units as quickly as possible to reduce the amount of time households wait for units. This could include strategies such as identifying landlords who are willing to work with the recipient, inspecting units for Housing Quality Standards in advance of a household being shown the unit, and identifying landlords who are willing to rent units that are already in compliance with HUD's standards of FMR and rent reasonableness.

**Q. What are the required timeframes for documenting homeless eligibility?**

A. Timeframes and dates are extremely important for homeless eligibility. The following are brief descriptions of the guidelines; however, it is necessary to refer to the homeless definition final rule, and the forms provided in the toolkits for further documentation requirements.

- Category I: Documentation must verify the clients living situation at the time of assistance (i.e., night before lease up).
- Category II: Documentation must establish that the client will lose their primary residence within fourteen days of the date of application for assistance.

- Category IV: Documentation must be reflective of the clients' homeless status at the time of entry.

**Q. What is HUD's preferred method for documenting homeless eligibility status?**

A. The preferred order of priority for documenting homelessness is:

- Third-party documentation
- Intake staff observation
- Self-certification

**Q. Which programs require a disability as an eligibility factor?**

A. Disability is an eligibility qualifier for COC permanent supportive housing clients.

**Q. What constitutes an eligible source for providing documentation of disability?**

A. Written verification must be obtained from a professional who is licensed by the state to **diagnose and treat** the condition, **or** by written verification from the Social Security Administration, or the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation).

Note: An agency employee who is licensed in the state to **diagnose and treat** a potential client's disability, may be an eligible source of documentation.

**Q. Is a supervisor required to sign each homeless documentation checklist?**

A. The homeless documentation checklist was designed to ensure that only eligible clients are enrolled. In order for the form to be complete, it must be reviewed and signed by a supervisor or equivalent.

## **Personnel Activity Reports (PARs)**

**Q. If a client does not show for a scheduled case management session, how should the time be allocated and/or billed?**

A. It is allowable to charge for a reasonable block of time spent preparing for and waiting on a client for a scheduled case management session. The time is billable to case management and must be supported by documentation reflecting the session was scheduled. It is recommended that no more than fifteen minutes be charged for time spent waiting.

**Q. How should time spent driving to conduct a home visit be recorded on a PAR?**

A. Time spent driving to conduct a case management home visit is billable to case management. Documentation on the PAR should reflect case management, identify the client, and be supported by client case notes reflective of the session.

**Q. Are the activities documented on a PAR required to be recorded in 15 minute increments?**

A. The actual time spent to conduct the activity should be recorded; partial hours should be rounded to the nearest 15 minute increment.

**Q. Is employee leave time eligible for reimbursement from the grant?**

A. Leave time is an allowable expense for HUD CPD programs, when staff salary is part of the approved grant budget. Agencies must establish a formula based upon actual staff time worked in each funding source to determine the allocable amount of leave time billable to each grant.

**Q. Is a supervisor signature on the PAR summary sufficient in lieu of a signature on each daily PAR?**

A. A supervisor may sign a summary document in lieu of signing each daily PAR, provided the supervisor has first-hand knowledge of the actual activities conducted by the employee and the summary document contains wording that the supervisor has reviewed the information contained on the daily PAR and certifies it to be a true and accurate accounting of the staff member's time. The daily PARs that comprise the summary must be attached to the summary. Note: It is recommended the daily PAR document be updated to remove the supervisor signature line if the PAR summary method above is utilized.

**Q. Is staff training an eligible expense?**

A. Eligibility of this expense is program specific and is determined by the type of training. HUD sponsored training is billable under Administration, if administration was awarded in your program budget. The cost of providing internal training on program specific requirements is an eligible Administration cost for the staff providing the training, but not the staff attending the training. HMIS training is an eligible HMIS expense, if HMIS was awarded in your program budget. Professional development costs are not an eligible expense. (i.e. grant funds cannot pay for staff to learn how to be a better case manager.)

## **ESG Specific**

**Q. Is a habitability inspection required before case management can be provided to a client with Prevention or Rapid Rehousing funds?**

A. Case management may begin prior to the habitability inspection; however, if the client will also be receiving financial assistance, (e.g. rental assistance, utility assistance, etc.) the inspection must be completed prior to that financial assistance. This is applicable whether ESG funds are assisting the client to remain in the unit the client is currently living in or assisting the client to move into another unit. ESG Funds must not be used to assist a client to reside in a unit that does not pass the habitability inspection.

## **CoC Specific**

**Q. If an agency enters into a Memorandum of Understanding (MOU) with an entity to provide in-kind services, and that entity is unable to fulfill the commitment outlined in the MOU, can the agency address the deficit by providing cash match?**

A. Yes. If an MOU is not fulfilled, cash may be used to assist with meeting the match requirement. It is important to remember that in order for funds to be eligible as program match, they must

be spent on program eligible clients and activities, as well as fully documented and supported by source documentation.

## **Match/Budget**

**Q. Since fundraising is not an eligible grant activity, are funds obtained from a fundraiser or donations eligible to be used as match?**

A. Although time spent “fundraising” is not an eligible grant expense, funds obtained through fundraising or donations may be used as cash match if spent on eligible items or activities for eligible clients and properly documented.

**Q. Are expenses designated as match required to be identified in the project budget?**

A. Match for ESG and COC is not required to be met on a line-item-by-line-item basis but can be met by incurring and paying for other activities that would be eligible under your agency’s specific program. Use caution to ensure that the proposed match is eligible under your specific program. Example: Rental Assistance may not be used to match a Supportive Services Only grant. Match for Shelter plus Care must be met with eligible Supportive Services as reflected in 24 CFR 582.

**Q. How would an agency document that donated items went to eligible clients?**

A. Items donated to the shelter would be recorded on a log of donated items, and the value recorded in the agency line item accounting system. In turn, when these items are distributed to program eligible clients, a log reflecting the client and the value of the item provided would be maintained. For example, if food is the donated item and the food is prepared and served to a group, a list of all the clients who received the meal should be maintained and the value prorated accordingly.

**Q. Do all the requirements of match also apply to leverage?**

A. Match and Leverage are separate and distinct categories in regard to CPD grants. Match (cash or in-kind) must be used for **eligible** program costs and leverage funds can be used for **any** program related costs.

**Q. If a client qualifies as an ESG or CoC client and we are going to serve them and use the value of the services provided to them as match, must they be entered into HMIS?**

A. Clients who are being served with match funds must be entered in HMIS. It is important to remember that in order for services provided to a client to be counted as part of the required cash match, the client must be documented to be eligible for ESG or CoC, and a complete client file must be maintained for the client just as if they were being served with direct grant funds. It can be from any eligible component and should be entered into HMIS accordingly. Contact the KYHMIS HelpDesk if you need to create a KYHMIS project for that client.

**Q. Is program income required to be spent prior to drawing grant funds?**

A. Agencies must have clearly defined policies reflecting the plan for managing program income. The policy should define the proposed use of incoming program income. When program income

is received, the funds must be spent before requesting additional grant funds under any category that is included in the agency budget. If the agency policy is to use program income for eligible grant expenses that are not included in the approved budget, the funds are not required to be spent prior to requesting additional grant funds. It is important to remember that program income should be spent in the same grant year it is received.

## **HMIS**

**Q. How often must the KYHMIS Release of Information (ROI) form be updated? Does it automatically update annually?**

A. Program participants must sign a new ROI annually. The master ROI form template is updated annually by KHC and agencies are notified by eGram when updates are made.

**Q. Is the information on the KYHMIS forms applicable to Victim Service Providers (VSP) that use a comparable database other than KYHMIS?**

A. Yes. VSPs must ensure all information requested on the KYHMIS sample forms is included on the forms utilized by the VSP for the comparable database.

**Q. Should an agency have more than one HMIS user?**

A. Agencies are encouraged to have more than one HMIS user; however, each user must have their own HMIS user license.