

South Dakota Housing for the Homeless Consortium (SDHHC)
Continuum of Care (CoC)
Written Standards for CoC, YHDP, and ESG Programs
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Introduction

The South Dakota Housing for the Homeless Consortium (**SDHHC**) is an unincorporated statewide organization consisting of service providers, individuals, city/county/state/federal government, domestic violence agencies, tribal entities, veteran programs, persons with a lived homelessness experience and faith-based organizations. The organization is primarily concerned with fulfilling the function as a Continuum of Care (**CoC**). The U.S. Department of Housing and Urban Development (**HUD**) refers to this CoC as SD-500 – South Dakota Statewide CoC. SDHHC is SD-500 CoC. The CoC is governed by the Policy and Advisory Committee (**PAC**), a collection of stakeholders elected to four-year terms by the general membership of the CoC.

SDHHC governs the implementation of the Continuum of Care grant, the Youth Homeless Demonstration Project (**YHDP**) and Emergency Solutions Grant (**ESG**). Any entity within the SDHHC geographic boundary that operates a project with the funding listed above is considered a Partner Agency of the Continuum of Care and the Consortium. The Consortium is open to anyone whose personal and professional lives touch the issue of homelessness and is committed to the ideals of the Consortium.

Beliefs

Housing and other basic human needs should be within everyone’s reach in an affordable and dignified manner.

Vision and Values

- Empower those at risk of or experiencing homelessness to self-sufficiency
- Homelessness is unacceptable, preventable, expensive and resolvable through education, coordination and collaboration.

Purpose

The purpose of the SDHHC is to:

- Promote a community-wide commitment to the overarching goal of ending homelessness through programming and housing opportunities.;
- Research and apply for federal and, as time and staffing allows, non-federal funding opportunities for nonprofit providers and local governments to rapidly re-house homeless individuals and families while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness;

- Promote access to and effective utilization of mainstream programs by individuals and families experiencing homelessness;
- Optimize self-sufficiency among individuals and families experiencing homelessness.
- Strive to meet the standards and requirements of HUD designated High Performing Communities (HPC). (Reference Subpart E—High-Performing Communities§ 578.65 Standards.); and
- Facilitate collaboration of community-based organizations, businesses, concerned individuals, advocates, government representatives, and persons with lived homelessness experience within the state of South Dakota to actively participate in a long-term collaborative planning process focused on identifying and responding to issues related to homelessness.

The purpose of these Written Standards is to:

- Govern the provision of CoC, YHDP and ESG assistance to households experiencing homelessness.
- Create a standard of quality and equity for all services provided in the Continuum.
- Provide a template for Partner Agencies to reflect these standards in their own policies and procedures.
- Provide a framework for ongoing compliance monitoring.

These Written Standards are not intended to replace the CoC or ESG Interim Rules but are more a reflection of our community’s decision to identify and emphasize our values and priorities for program implementation. The CoC Lead is ultimately responsible for ensuring these standards remain up to date and align with federal, state and local regulations and best practices. Any revisions to this document will be reviewed and approved by the PAC.

Geographic Area

The SDHHC covers all 66 counties in the State of South Dakota. Beginning in 2021, HUD implemented changes that altered Continuum of Cares (CoC)s geographic organization and apply to all CoC’s nationwide. In 2022, Federally Recognized Native American Tribes with geographies in South Dakota, were invited to join with SDHHC and to incorporate the lands of the Tribes within the geography of SDHHC, which is now recognized as the 66 counties of the State of South Dakota and the geographies of Tribes that have consented to join SDHHC on an annual basis.

Guiding Principles

- Housing First
 - A homeless assistance approach that is guided by the belief that people need basic necessities like housing, before attending to less critical issues. Housing First asserts that client choice is valuable in the selection of housing and support services participation. Projects will do everything within their power to not reject a household on the basis of poor credit, financial history, poor or lack of rental history, minor criminal convictions, sobriety or behavior that is interpreted as lacking “housing readiness”. Support services are offered, but participation is **not required** as a condition to receive housing services. Homelessness is understood as first

and foremost a housing crisis. Housing First relies on the following two philosophies of being Person-Centered and Strength-Based; it removes the risk of re-traumatizing households through termination and eviction back to homelessness.

- Person Centered
 - Projects within the CoC should operate with an approach that values a participant's well-being and dignity. Assessments should be based on participant's self-reported goals, risks and strengths. Projects and their resources should be accessible, well-advertised and easily understood. Should a participant have a reasonable request for a format that is more accessible (language or location) to them this should be accommodated. The CoC processes should allow for participant choice and have expectations for participant and available resources communicated non-judgmentally. Cultural competency and understanding of the lived experience of homelessness are a crucial skill for CoC project staff.
- Strength based
 - Projects are able to best serve participants by collaborating with them. A strength-based approach finds the inherent strengths of participants and uses them to assist that participant in achieving their self-reported goals. This approach emphasizes the belief that there are no limits to a participant's ability to grow and achieve stability.
- Data-Driven
 - Projects should be committed to collecting high-quality data that can be used to inform decision making. Quantitative information should always be considered before any anecdotal or qualitative information. A project's success should be based on items that can be consistently measured.

Fair Housing and Equal Opportunity

Discrimination based on protected classes, including non-compliance with the Americans with Disabilities Act is prohibited by local, state and federal law. All project funds must comply with HUD's nondiscrimination and equal opportunity provisions of Federal Civil rights laws as laid out in 24 CFR.5.105 (a); including but not limited to:

- Fair Housing Act (42 USC 3601-19)
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act
- HUD's Equal Access Rule

Equity in Gender Identity

All CoC, YHDP and ESG projects should establish a standard for non-discrimination that is available to all program participants. Gender identity and gender expression will be listed as protected classes in this policy. Internal and external publications applicable to the program will use inclusive language and state the program's commitment to racial and LGBTQ equity.

VAWA

In accordance with the Violence Against Women Act (VAWA), program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, must be allowed to request an emergency transfer from the tenant's current unit to another unit when there is imminent risk of harm. CoC and ESG funded programs must ensure a transfer is available regardless of sex, gender identity, or sexual orientation. The emergency transfer plan must identify tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security.

HMIS Participation

Providers, except for victim service providers, should actively utilize the Homeless Management Information System. Providers should obtain informed consent from participants before submitting personally identifying information. Projects should have a comprehensive understanding of their program's required data elements.

Projects should be committed to collecting high quality data and should have a staff member identified as their agency lead for HMIS who has read and understands the SDHMIS Governance Charter and Policy Procedures document which establishes a written standard for that project's implementation.

Coordinated Entry Participation

The Coordinated Entry System (CES) uniquely designed by the South Dakota Housing for Homeless Consortium (SDHHC) for South Dakota Continuum of Care (SD-CoC). The CES Policy and Procedure Manual defines policy and procedures ensuring that persons experiencing homelessness and persons at risk of homelessness, are matched as quickly and efficiently as possible with the available intervention that will most effectively end their experience with homelessness, or prevent that experience from ever happening. CES has adopted written standards that meet the requirements of the HEARTH Act and Policies and/or Procedures required by United States Department of Housing and Urban Development (HUD).

More information can be found in the SDCES Operations Manual. All projects should have an Agency CE Lead who is the main point of contact for matters related to CE. This staff member should

be well acquainted with the SDCES Operations Manual which establishes a written standard for that project's implementation.

Faith-Based Organizations

SDHHC will not discriminate against any organization or person's membership, participation or application for funds on the basis of their religious beliefs or affiliations. Faith-based organizations receiving funding through the CoC, YHDP or ESG program, either directly or as a subrecipient, has the right to:

- Retain its independence from federal, state, and local governments
- May continue to carry out its mission
- May use space in its facility to provide CoC or ESG Program-funded services without removing religious art or symbols
- Retains authority over its internal governance
- May retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statement and other governing documents

However, faith-based organizations cannot require participation in religious activities in order to receive funded services. Inherently religious activities such as worship, religious instruction, or proselytization cannot be a part of the programs or services that are funded by CoC, YHDP, or ESG grants. Such activities would need to be clearly communicated to participants as optional and will be held at a separate time or location from the program or services that are federally funded.

Program Eligibility

Please refer to the SDCES Operations Manual for more detail on CES prioritization. Projects must adhere to baseline eligibility requirements.

More information is available at the HUDExchange at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/>

The chart below outlines eligibility by project type for ESG and CoC projects. YHDP projects are eligible to Youth up to the age of 24 who meet HUD's definition of Category 1, 2, and 4.

Program Type	Funding	Homeless Category	Target Population	Income Requirements
Homeless Prevention	ESG	2, 4	All eligible Households	Must be below 30% Area Median Income (AMI) at entry and with every 3 month recertification
Street Outreach	ESG	1	All eligible households	None
Emergency Shelter	ESG	1, 4	None	None
Transitional Housing	YHDP	1, 4	<ul style="list-style-type: none"> ● Youth ● DV Survivors 	None
Rapid Rehousing	ESG, CoC,	1, 4	<ul style="list-style-type: none"> ● Non-Chronic ● Lower VI-SPDAT 	ESG-None at entry and below 30% AMI at annual recertification CoC - None
Permanent Supportive Housing	CoC, EHV	1, 4	<ul style="list-style-type: none"> ● Highest VI-SPDAT ● Veterans ● Chemically dependent 	None

Living Situations and Required Documentation for eligibility

Required documentation bullets are listed in order of priority. First-party verification should always be a last resort. Whenever applicants are determined to be eligible for ESG, CoC, YHDP, or EHV assistance there must be a record that includes documentation of the reason for that determination.

Category & Living Situation	Required Documentation
Sleeping in a place not meant for human habitation (i.e., car, park, abandoned building, bus station, airport, etc.)	<ol style="list-style-type: none"> 1. A written statement from a housing or service provider documenting the participations living conditions; 2. A written statement from an outreach worker observing the participants living conditions; 3. A self-certification from the participant

<p>Category 1</p>	<p>documenting their living conditions. This self-certification must include a statement from the subrecipients intake worker documenting their attempt to obtain third-party verification.</p>
<p>In an emergency shelter, i.e., congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or government programs</p> <p>Category 1</p>	<ol style="list-style-type: none"> 1. HMIS bed stay documentation 2. A written statement from the emergency shelter provider documenting the participants stay
<p>Exiting an institution where the participant resided for 90 days or less and resided in an emergency shelter or place not meant for habitation immediately before entering the institution</p> <p>Category 1</p>	<p>Written verification from the institution documenting exit date and length of time in the institution AND one of the following:</p> <ol style="list-style-type: none"> 1. A written statement from an outreach worker documenting the participants living conditions prior to entering the institution; 2. A written statement from a housing or service provider documenting the participants living conditions prior to entering the institution; 3. A self-certification from the participant documenting their living conditions prior to entering the institution. The self-certification must include a statement from the subrecipients intake worker documenting their attempt to obtain third party verification.
<p>Moved because of economic reasons two or more times during the 60 days immediately preceding the application for ESG</p>	<p>Evidence of moving includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. moving receipts

<p>homelessness prevention assistance</p> <p>Category 2</p>	<ol style="list-style-type: none"> 2. change of address documentation (utility bills, bank statements, pay stubs, etc.) 3. eviction notice 4. leasing documents <p>In instances where the above documentation is unavailable, HUD allows for a written statement from the relevant third party to suffice. This may include a current or former employer, owner, primary lease holder, public administrator, and hotel or motel manager.</p>
<p>Living in the home of another because of economic hardship</p> <p>Living in a hotel/motel paid NOT paid for by a charitable organization, government source or low-income program.</p> <p>Category 2</p>	<p>ESG subrecipients should gather all available evidence to document that a participant who lives in the home of another or a hotel they are paying on their own, is living there due to economic hardship and that without ESG services, the household would have to leave that unit and become literally homeless, Category 1. Documentation that can accomplish this includes:</p> <ol style="list-style-type: none"> 1. records of past evictions 2. bank or ATM statements 3. record of loss of employment 4. expense receipts 5. verification from owner, primary leaseholder. <p>All documentation should have comprehensive case notes that recount the participants recent experiences up and support the decision to enroll that participant. For households staying in a hotel, agencies should demonstrate that that they do not have the ability to continue paying and staying in that hotel.</p>
<p>Written notification that their right to occupy their unit will be terminated within 14 days of</p>	<p>A court ordered, written notice of eviction from the landlord that requires the household to vacate the premises within 14 days of their application for</p>

<p>their application for assistance</p> <p>Category 2</p>	<p>assistance.</p>
<p>Fleeing or attempting to flee domestic violence or other instances of violence in the home, and/or life-threatening conditions as permitted by HUD, and/or have left and are fearful of returning to their home</p> <p>Category 4</p>	<p>Documentation may include:</p> <ol style="list-style-type: none"> 1. A police report 2. Third-party verification from VSP 3. Lapsed or current restraining orders 4. Affidavits from restraining orders 5. Medical records that reference DV 6. Written statements from social workers or mental health providers <p>When third-party documentation is unavailable, providers may accept a self-certification from the head of the household that states the household is fleeing, or attempting to flee domestic violence or other life-threatening violence and is unsafe remaining in or returning to their home.</p>

Program Standards

Standards for All Projects

- Projects must coordinate with other homeless services within the CoC.
- Projects must coordinate with mainstream resources and document these referrals in client files.
- Projects should be designed for inclusion and not exclude households who are deemed to have too many barriers to their success.
- Projects must have written policies and procedures that are consistently applied to all participants.
- Projects receiving HUD funds must participate in HMIS and meet minimum HMIS data quality standards
 - Victims service providers are required to use the comparable database: South Dakota DV HMIS
- Projects categorized as TH, RRH, HP, EHV or PSH must participate in the Coordinated Entry System for referrals and case conferencing.
- Projects must conduct an initial evaluation to determine the amount and type of assistance needed to regain stability in permanent housing.

- Projects should have a fair and consistent process for terminating assistance.
- All shelter projects and housing units, including scattered-site programs, must meet applicable state and local health and safety codes in addition to the appropriate Habitability Standards or the Housing Quality Standards.

Street Outreach Standards

All Street Outreach teams should strive to accomplish the following goals:

- Conduct an initial assessment of needs and eligibility for community resources
- Provide crisis counseling and rapid diversion
- Address urgent needs for the households safety and wellbeing
- Actively refer to Coordinated Entry and follow up with households on the queues.
- Actively refer to available community and mainstream resources.

Participants are only eligible for Street Outreach services if they meet the criteria under “literally homeless”, Category 1.

Emergency Shelter Standards

- HEARTH Act Sec 404 – Preventing Involuntary Family Separation
 - All HUD-funded programs must comply with Section 404 of the HEARTH Act which prohibits shelters from denying access to families based on the age of a child. Projects cannot deny households for the age of a child nor can they deny that one household member (e.g., a teenage son)
 - SDHHC strongly supports family unity and asks that all shelter facilities have written policies and procedures that comply with this language.
 - A **family** is any household that presents together for services and identifies themselves as a family regardless of age, relationship, marital status, actual or perceived gender identity or sexual orientation. While it is acceptable for a shelter or housing program to limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter must also serve the following family types, should they present, in order to comply with the Equal Access rule:
 - Single male head of household with minor child(ren); and
 - Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).
- Length of stay
 - Shelters should strive for participant length of stays to be less than 30 days.
 - Shelter staff are advised to use best judgment when determining participant enrollment length and make every effort to not retraumatize households whose shelter service is soon to expire. Extensions should be applied consistently and be well documented.

Transitional Housing Standards

Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must automatically renew upon expiration, except on prior notice by either party, up to a maximum term of 24 months (§578.51). Projects are not required to charge rent or

occupancy fees. If projects choose to do so they must comply with the section of this document on “Calculating Rent”. No other fee than rent or occupancy charges can be charged to participants.

§578.79 Limitation on transitional housing states: “A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.”

Rapid Rehousing Standards

All Rapid Rehousing providers are required to fulfill three core components:

1. Housing Identification
 - a. Programs must actively engage with landlords to assist CE referred participants locate housing.
2. Rent and Move-In Assistance
 - a. Participants should be assessed for the appropriate amount of rental assistance. Financial assistance should be just enough to help a household obtain and stabilize housing. Barriers that prevent a participant’s timely move-in to the unit should be addressed by the project.
3. Case Management
 - a. Participants should be required to meet with a case manager no less than once a month. Projects should provide adequate coverage of case managers who work with households to address threats to the participants' stability.

To meet these Core Components, Rapid Rehousing Programs must follow all requirements set forth by federal regulations (CoC regulations at 24 CFR Part 578 and ESG regulations at 24 CFR Part 576). For additional differences between CoC and ESG program regulations, refer to HUD’s publication: “Rapid Re-Housing: ESG vs. CoC” (published 2013).¹

Homeless Prevention Standards

ESG agencies operating Homeless Prevention Projects must ensure that all participants meet the criteria under the “at risk of homelessness” definition, Category 2 or meet the criteria under Category 1, “literally homeless”. In addition, participants must have an annual income below the 30 percent of the Area Median Income as determined by HUD. Homeless Prevention costs are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current permanent housing or to locate and move into other permanent housing and achieve stability.

Permanent Supportive Housing Standards

PSH programs should be prioritized for chronically homeless households assessed with the highest needs. They should operate with very few programmatic barriers or prerequisites to entry. Intake processes

should be efficient; supportive services should be voluntary. Tenants will have the full rights, responsibilities and legal protections afforded to them as tenants yet the project will be proactive in minimizing lease violations and therefore evictions.

Whenever a participant has been assessed as no longer needing a high-level of service the project should pursue “move-on” strategies. This is to allow that subsidy to be awarded to a new household with those needs. Referrals to mainstream vouchers or available RRH programs are valid move-on strategies.

Gradual & Declining Subsidy and Maximum Rent Portion

Projects providing ongoing rental or utility payment assistance should implement a tapered structure to these services that will allow households to gradually assume full responsibility for these costs.

Program participants should be assisted in finding housing units whose total costs (rent and utilities) does not exceed Fair Market Rent and is less than 50% of the household’s income. Case workers should assist households with budgeting for housing expenses and locating cost-saving opportunities.

Participants Income

A program participant’s income should be verified at program entry to assist with eligibility determinations. That income must then be re-verified at least annually to determine the amount of the contribution towards the rent obligation. §578.77 details participant income and §578.103 details recordkeeping requirements for participant income. Acceptable documentation for verifying include pay stubs from employer or child support source, tax statements, written or verbal certification from DSS, written or verbal certification from employer.

Per §578.77 program participants are required to supply the requested information/documentation necessary for the project to verify income upon request or anytime their household income changes. Refusal to do so is grounds for termination. Program participants have the right to request an interim reexamination of their income to allow for rent adjustments when there are changes to family composition or decreases in income.

Calculating Rent

Program participants may not be required to pay occupancy charges in excess of the highest of 30% of the family’s monthly adjusted income, 10% of the family’s non- adjusted income, or the portion of a public agency’s payment that is specifically designed to meet the family’s housing costs. This regulation is defined in §578.77

Program Income

Whenever a program participant is required to pay a rent or occupancy charge the project is generating income that is subject to all the regulation as defined in CFR §578.97:

- A. *Defined.* Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.

- B. *Use.* Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.
- C. *Rent and occupancy charges.* Rents and occupancy charges collected from program participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.”

Case Management

Referrals to mainstream resources

All HUD-funded programs are expected to provide referrals to appropriate mainstream resources with the goal of increasing the household’s capacity to obtain and maintain housing. Mainstream benefits include: benefit screening, employment education and search, childcare, behavioral and physical health services, health insurance, legal counseling, continuing education, financial literacy, and subsidized housing through non-homeless funding sources. These referrals can happen through case management, assessment outreach or post-housing follow up. Agencies should identify the appropriate times for such referrals within their operations and streamline the process to ensure all households are receiving the same information consistently based on identified needs.

Safety Planning

All HUD-funded programs are expected to adhere to best practices in regards to participant safety and wellbeing. Survivors of domestic violence, sexual assault and human trafficking should complete preliminary assessments to determine safety needs and referrals to appropriate trauma informed services should be provided when necessary.

Exit Plans and Follow-up Procedures

All projects should have a standard for the creation and implementation of a participant’s exit plan. As a best practice discharge planning should begin at intake using the household’s self-reported goals and desires. Projects should document the regular review of this exit plan with participants as household circumstances change. This plan should include, at a minimum, a planned exit destination and sources for ongoing support.

Projects should attempt to follow up with participants through verbal or written means no more than 6 months after that participants exit to determine if further referrals or interventions are needed to prevent future episodes of homelessness.

Terminations and Grievances

Should a participant no longer meet minimum eligibility requirements for assistance or if the participant violates program requirements the project may terminate assistance. Project procedures and policies must outline the termination and appeals process. These policies and procedures must be given to the participant at program entry and again at the time of termination. A participant who has their assistance terminated is not barred from receiving assistance in the future, either as an individual or part of another family.

At a minimum each project termination should consist of:

1. A written notice to the participant containing a clear statement of the reasons for termination; and
2. A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Prompt written notice of the final decision to the participant.

Agency Policies and Procedures

All HUD funded projects should create agency level policies and procedures (often referred to as Admin Plans) that include, but are not limited to:

- Standards for participant eligibility, project outreach, intake process, managing any waitlists and reassessing participants.
- Enrollment progression (case management and referral procedures, individualized service plans, meeting safety needs, confidentiality, exit planning)
- HMIS participation and processes (agency HMIS lead, data collection and internal review processes, compliance with SDHMIS Governance Charter and Partnership agreements)
- CE participation and processes (Agency CE Lead, agency role as it pertains to the 4 Core Elements of CE, case conferencing role)
- Discharge and Termination processes (required documentation, grievance procedures, file closing)
- Requirement for a person with lived experience to serve on a project's Board of Directors or other decision-making body.
- Ongoing training expectations for direct service staff.

Additional agency-wide standards that should be in place include:

1. Drug-Free Workplace

- a. All CoC, YHDP, and ESG-funded projects will certify that they operate in accordance with the Drug-Free Workplace Act of 1988 (41 U.S.C. 701) and HUD's implementing regulations at 2 CFR § 2429. All projects shall notify HUD about any employee's

conviction for a criminal drug offense pursuant to HUD-50070. Projects that are not HUD funded are strongly encouraged to adopt a Drug Free Workplace policy.

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

- a. Employment and other economic opportunities generated by federal financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed toward low and very low-income persons, particularly those who are recipients of government assistance for housing.

3. Anti-Lobbying Act

- a. All CoC, YHDP, and ESG-funded projects are prohibited from using their funds for lobbying any federal, state, or local government in connection with a specific contract, grant or loan.
- b. All CoC, YHDP, and ESG-funded programs shall comply with 24 CFR part 87 by using the Standard Form LLL (SF-LLL) to disclose any non-federal funds that will be or have been used to influence federal employees, members of Congress or their staff regarding specific grants or contracts.

Monitoring

The CoC Interim Regulations (24 CFR § 578.7(a)) mandate that the Continuum of Care do the following:

1. Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and act against poor performers; and
2. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD.

The CoC and ESG Administrators for the SDHHC will implement a regular monitoring process that:

- Improves system performance by identifying barriers to effective program performance
- Assist HUD-funded projects with their understanding of program compliance and financial management
- Assist agencies in preparing for audits or monitoring from HUD
- Identify opportunities for training and technical assistance needed to identify and address system wide gaps in service provision.

Recordkeeping Requirements

1. **All records pertaining to CoC funds will be retained for 5 years from the expenditure of the grant, or, in the case of documentation of each program participant's eligibility and other program participant records, for 5 years after the expenditure of all funds from the grant under which the program participant was served. 24 CFR 578.103(c)(1-3). Records required include the following, according to 24 CFR 578.103(a):**

- a. Verification of Homeless Status CONTRA COSTA WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE Adopted by Council on Homelessness – May 4, 2023 29
- b. Verification of Chronic Homeless Status (if applicable)

- c. Annual Income Verification and Rent Contribution Calculation for Participants receiving Housing Assistance
- d. Program Participant Records
- e. Signed Occupancy Agreements or Leases
- f. Notice of Occupancy Rights and Certification Forms required by VAWA vii. Housing Quality Standards Checklist
- g. Services Provided
- h. Other records required by HUD or individual programs

2. ESG Programs will maintain additional documentation to demonstrate:

- a. The program participant met with a case manager at least once per month. 24 CFR 576.401(e)(1-2) and 24 CFR 576.500(f).
- b. The program used a plan to assist the program participant to retain permanent housing after the ESG assistance ends, 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
- c. Programs made efforts to assist each program participant to obtain mainstream or other resources as needed. 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
- d. Rental Assistance Agreements were entered into with each owner before providing the owner with rental assistance payments. 24 CFR 576.106(e), 24 CFR 576.500(h), 24 CFR 576.106(f).

3. HUD may monitor projects as long as records are maintained. 24 CFR 578.103(d)(1). All client files are available for HUD monitoring, and will be reviewed during CoC monitoring visits at least once per fiscal year.