



City of Lowell: Partnership for Change to End Homelessness *Lowell Continuum of Care ~ MA-508*

CoC Program: HUD Grants Administration Guide to CoC Recordkeeping

3.3 Recipient Grant-Specific Recordkeeping Requirements

For each CoC Program grant, recipients and subrecipients must maintain separate records to document that the project is in compliance with the service provision, match, and housing quality standards (HQS) requirements in the CoC Program interim rule. The recipient must also maintain well-documented and accurate project records related to subrecipient or other contractor activities.

1. *Services Provided*

Recipients or subrecipients must document the types of supportive services provided to individuals and families and the amounts spent on those services. They must also document that such information undergoes review at least annually and that the service package offered to program participants was adjusted accordingly.

2. *Housing Quality Standards*

Recipients or subrecipients must retain documentation to demonstrate compliance with the housing standards at 24 CFR part 578.75(b). These standards require the recipient or subrecipient to inspect housing units leased with CoC Program funds and units for which rental assistance payments are made with CoC Program funds to ensure the assisted units meet the applicable housing standards.

3. *Match*

- a. The recipient must keep records of the source and use of cash and in-kind contributions used to satisfy the 25 percent match requirement as described at 24 CFR part 578.73.
- b. Match records must indicate the grant and fiscal year for which each matching contribution is counted. If the subrecipient is responsible for some or all of the match commitment, the recipient should collect appropriate documentation from the subrecipient in order to comply with the match recordkeeping requirements.

4. *In-Kind Services*

- a. If in-kind services are used to fulfill part of the match, the recipient must keep a copy of the Memorandum of Understanding (MOU) executed between the recipient or subrecipient and the third party that will provide the services.
- b. The recipient or subrecipient must maintain documentation of the actual in-kind services provided to program participants and in-kind contributions to the project throughout the grant period. The records must evidence how the value placed on third-party in-kind contributions was derived.
- c. To the extent feasible, in-kind match represented by volunteer services must be documented using the same methods used by the recipient or subrecipient to support the allocation of regular personnel costs. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If employees of the recipients or subrecipients do not perform similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

3.4 Grant-Specific Program Participant Recordkeeping Requirements

For each grant, recipients and subrecipients must document and maintain records related to program participant eligibility and the services received by program participants in order to ensure that CoC Program funding is used in accordance with HUD requirements and grant agreements and to document that program participants are served as intended.

The program participant recordkeeping requirements and acceptable forms of evidence for homeless status, as well as disability verification are detailed in resources available on the OneCPD Resource Exchange.

<https://www.hudexchange.info> Recipients and subrecipients should refer to these materials, as program participant eligibility documentation is a complex topic. Below is brief overview.

Homeless Status

Recipients or subrecipients must keep CoC Program records documenting acceptable evidence of homeless status of program participants as set forth in 24 CFR part 578.103(a)(3).

Records of Reasonable Belief of Imminent Threat of Harm

For each program participant receiving tenant-based rental assistance who has moved to a different CoC in response to imminent threat of further domestic violence, dating violence, sexual assault, or stalking per 24 CFR part 578.51(c)(3), each recipient or subrecipient must retain the following, as found in 24 CFR part 578.103(a)(5):

1. Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file.
 - a. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.
2. Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking
 - a. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household

Program Participant Records

In addition to evidence of —homeless status or —at-risk-of-homelessness status, recipients and subrecipients must keep records for each program participant that document the following:

1. The services and assistance provided to the program participant, including evidence that the recipient or subrecipient:
 - a. Conducted an annual assessment of services for program participants who remain in the project for more than a year,
 - b. Adjusted the service package accordingly, and
 - c. Provided case management services not less than once per month to program participants receiving rapid re-housing, as provided at 24 CFR part 578.37(a)(1)(ii)(F).
 - d. In cases of termination of assistance, the recipient or subrecipient complied with the regulation at 24 CFR part 578.91.

Annual Income

For each program participant who receives CoC Program housing assistance when rent or an occupancy charge is paid by the program participant, recipients or subrecipients must keep the following documentation of annual income:

1. Income evaluation form specified by HUD and completed by the recipients or subrecipients;
2. Source documents (e.g., most recent wage statements, unemployment compensation statements, public benefits statements, bank statements) for the assets held by the program participants and income received before the date of the evaluation;
3. To the extent that source documents are unobtainable, written statements by the relevant third-parties (e.g., employer, government benefits administrator) or written certification by the recipients' or subrecipients' intake staff of the oral verification by the relevant third-party of the program participant's income over the

- most recent period; or
4. To the extent that source documents and third-party verification are unobtainable, written certification by the program participants of the amount of income that the program participants are reasonably expected to receive over the 3-month period following the evaluation.

3.5 Confidentiality of Records

In addition to meeting the confidentiality and security requirements for HMIS data, and the standards described in Section 2.3 of this user guide, the recipients and subrecipients must develop and implement written procedures to ensure:

1. All records containing protected identifying information of any individual or family that applies for and/or receives CoC Program assistance will be kept secure and confidential.
2. The address or location of any family violence project assisted with CoC Program funds will not be made public, except with written authorization of the person responsible for the operation of the project; and
3. The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

3.6 Period of Record Retention

All records containing information related to CoC Program funds and activities must be retained and kept accessible for either 5 years or the period specified below, whichever is longer. Copies of records may be substituted for original records.

1. Program participants' qualifications, eligibility documentation, and other program participant records must be retained for 5 years after expenditure of all funds from grant under which program participants were served.
2. Records for acquisition, new construction, and rehabilitation must be retained for 15 years following the date the project is first occupied, or used, by program participants. Only those records related to the acquisition, rehabilitation, or new construction must be retained for 15 years. All other records must be retained for the period of time specified above.

3.7 Access to Records

1. HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, have the right of access to all books, documents, papers, or other records of the recipients and subrecipients that are pertinent to the CoC Program grant for purposes of conducting audits, examinations, and transcripts.
2. In addition to HUD access, the recipients must provide citizens, public agencies, and other interested parties with reasonable access to records regarding the use of CoC Program funds received during the preceding 5 years, consistent with State and local laws regarding privacy and obligations of confidentiality and confidentiality requirements.

3.8 Reports

In addition to the reporting requirements at 24 CFR parts 84 and 85, the recipients must collect and report data on their use of CoC Program funds in an Annual Performance Report (APR) and any additional reports required by HUD. For more information on the APR, see HUD's APR Training Materials.

1. Projects receiving grant funds only for acquisition, rehabilitation, or new construction must submit APRs for 15 years from the date of initial occupancy or date of initial service provision, unless HUD provides an exception under 24 CFR part 578.81(e).
2. According to 24 CFR part 578.33(f), HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if:
 - a. The recipient fails to submit an APR in a timely manner for the grant year immediately prior to renewal; or
 - b. The recipient submits an APR that HUD deems unacceptable or that shows non-compliance with the requirements of the grant and the CoC Program interim rule.

