



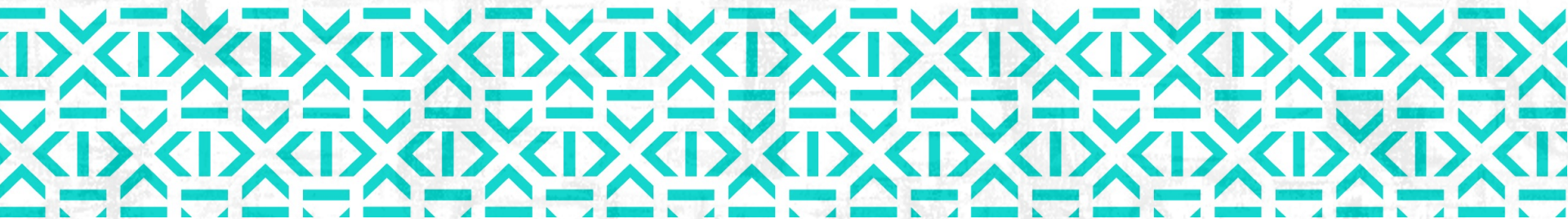
Eligible Uses of CoC Funding

Santa Clara County CoC
Compliance 101

Agenda

- I. Welcome & Introductions
- II. Eligible Costs
 - I. Rental Assistance & Leasing
 - II. Supportive Services
 - III. Operating
 - IV. Administrative
 - V. Indirect
- III. Timekeeping
- IV. Wrap up

Eligible CoC Program Costs



RADAR: Documenting Eligible Expenses

All costs charged to the CoC grant must be...

Reasonable

Allowable

Documented

Allocable

Reimbursable

Allowable Costs: Eligible vs. Approved

- **Eligible Costs:** All costs included in the Interim Rule
- **Approved Costs:** Costs included in a project's HUD-approved budget
 - Project can only spend CoC funds on approved costs
 - Project can request a grant amendment from HUD to charge to an eligible — but not approved — cost **with limitations**

Categories of Eligible Costs

Rental
Assistance

Leasing

Supportive
Services

Administrative
Costs

Operating
Costs

Rental Assistance & Leasing Costs

Rental Assistance:

Funds pay part of the rent for a unit in which a client resides

- Limited to Rent Reasonableness (may exceed Fair Market Rent)
- **Funds may also be used for** security deposit, first/last month's rent, up to 30 days vacancy, up to one month of rent to pay for damages to property

Leasing:

Funds pay for the full rent of a unit in which a client resides

- Limited to the lower of Fair Market Rent or Rent Reasonableness
- **Funds may also be used for** security deposit, first/last month's rent, Housing Quality Standards inspections, vacancies

What If A Program Has Excess Rental Assistance Funds?

Serve more participants

Cover costs of rent over FMR (up to Rent Reasonableness)

Cover eligible staff activity costs

Cover security deposits & property damage

Use up to 10% for other approved, eligible activity

Other changes (including change in subpopulation served) require HUD approval/grant amendment!

Supportive Service Costs

Provide services to assist transition from homelessness to supportive housing

- Must be necessary to assist program participants obtain & maintain housing (annual reassessment is required)
- Can include costs of labor (salary & benefits) and supplies/materials directly related to providing the services

Example: Gas for an agency vehicle used to transport clients for the purpose of providing eligible services

Eligible Supportive Services Costs

Assessing Service Needs	Food	
Moving Costs	Housing Search & Counseling Services	Outreach Services
Case Management	Legal Services	Substance Abuse Treatment Services
Child Care	Life skills training	Transportation
Education services	Mental Health Services	Utility Deposits
Employment Assistance & Job Training	Outpatient Health Services	

Supportive Services: Outreach Services

Initial assessment

Crisis counseling

Addressing urgent physical needs

Actively connecting & providing people with information & referrals to homeless & mainstream programs

Publicizing the availability of the housing & services provided within the geographic area covered by the CoC

Supportive Services: Case Management

Counseling

Developing, securing, &
coordinating services

Using the coordinated
assessment system

Obtaining federal,
State, & local benefits

Monitoring & evaluating
program participant
progress

Providing information &
referrals to other
providers

Providing ongoing risk
assessment & safety
planning with victims of
domestic violence,
dating violence, sexual
assault, & stalking

Developing an
individualized housing
& service plan

Supportive Services: Transportation

Client travel on public transportation or in program-provided vehicle to & from medical care, employment, childcare, or other eligible services

Mileage allowance for service workers to visit clients & to carry out housing quality inspections

Purchasing/leasing a vehicle to transport clients and/or staff serving program participants (including gas, insurance, taxes, & maintenance)

Costs of staff to accompany or assist clients to utilize public transportation

If public transportation options are not sufficient within the area, a one-time payment on behalf of a client needing car repairs or maintenance required to operate a personal vehicle, **subject to limits**

Supportive Services: Housing Search & Counseling Services

Tenant counseling

Assisting clients to understand leases

Securing utilities

Making moving arrangements

Mediation with property owners & landlords

Credit counseling, accessing a free personal credit report, & resolving personal credit issues

Payment of rental application fees

Supportive Services: Education Services

Services:

Instruction or training in
consumer education

Health education

Substance abuse prevention

Literacy

English as a Second Language

General Educational
Development (GED)

Component activities:

Screening

Assessment & testing

Individual or group instruction

Tutoring

Provision of books, supplies, &
instructional material

Counseling

Referral to community
resources

Supportive Services: Job Training and Employment Assistance

Establishing & operating employment assistance and job training programs that assist participants in:

- Acquiring learning skills (e.g., vocational licenses & certificates)
- Increasing earning potential
- Securing employment
 - Employment screening, assessment, & testing
 - Structured job skills & job-seeking skills
 - Special training & tutoring (e.g., literacy training & pre-vocational training)
 - Books & instructional material
 - Counseling & job coaching
 - Referral to community resources

Supportive Services: Life Skills Training

Teaching critical life management skills necessary to function independently in the community

Budgeting of resources & money management

Household management

Conflict management

Shopping for food & other needed items

Nutrition

Use of public transportation

Parent training

Supportive Services: Child Care

Establishing & operating child care, & providing childcare vouchers, for children from families experiencing homelessness, including providing meals & snacks, & comprehensive & coordinated developmental activities

Children without disabilities must be under 13

Children with disabilities must be under age 18

Childcare center must be licensed

Supportive Services: Legal Services

Eligible subject matters

- Child support
- Guardianship
- Paternity
- Emancipation
- Legal separation
- Orders of protection & other civil remedies for victims of domestic violence, dating violence, sexual assault, & stalking
- Appeal of veterans & public benefit claim denials
- Landlord tenant disputes
- Resolution of outstanding criminal warrants

Supportive Services: Outpatient Health Services

Analysis/assessment
of health problems &
development of a
treatment plan

Assistance with
understanding health
needs

Providing directly or
assisting clients to
obtain & utilize
appropriate medical
treatment

Preventive medical
care & health
maintenance
services

Provision of
appropriate
medication

Providing follow-up
services

Preventive & non-
cosmetic dental care

Supportive Services: Outpatient Mental Health Services

Crisis interventions

Counseling

Individual, family, or group therapy sessions

Prescription of psychotropic medications or explanations about the use & management of medications

Combinations of therapeutic approaches to address multiple problems

Supportive Services: Miscellaneous

Providing meals or groceries to program participants

Substance abuse treatment services

- Intake & assessment
- Outpatient treatment
- Group & individual counseling
- Drug testing

Utility deposits

Operating Costs

Costs associated with the day-to-day physical operation of a facility in which participants are housed, including:

- Maintenance & repair of housing (except if they are covered by rent per the lease)
- Property taxes and insurance
- Scheduled payments to reserve for replacement of major systems of the housing
- Building security
- Electricity
- Gas
- Water
- Furniture
- Equipment

Operating funds cannot be combined with Rental Assistance costs in the same unit/structure

General Billing Practices

Staff costs related to carrying out each eligible activity are eligible as part of that activity

Staff time should be billed to eligible activities, not to project administration

Where possible, costs of administering eligible activities should be billed to relevant eligible activities

Administrative Costs

Grantees may request an Admin budget line item to cover specific costs:

- General management, oversight & coordination
- Training on CoC requirements
- Environmental review

Administrative costs do not include staff & overhead costs directly related to carrying out rental, leasing, supportive services, or other eligible costs

General Management, Oversight, & Coordination

Salaries, wages, & related costs of staff engaged in program administration:

- Preparing & amending program budgets & schedules
- Developing systems for assuring compliance with program requirements
- Developing agreements with subrecipients & contractors to carry out program activities
- Monitoring program activities for progress & compliance with program requirements
- Preparing reports & other documents directly related to the program for submission to HUD
- Coordinating the resolution of audit & monitoring findings
- Evaluating program results against stated objectives
- Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those above

General Management, Oversight, & Coordination, cont.

Travel costs incurred for monitoring of subrecipients

Administrative services performed under third-party contracts or agreements, including:

- General legal services
- Accounting services
- Audit services

Other costs for goods & services required for administration of the program, including:

- Rental or purchase of equipment
- Insurance
- Utilities
- Office supplies
- Rental & maintenance (but not purchase) of office space

Allocating Shared Costs

Costs that benefit more than one cost objective and cannot reasonably be tracked to each activity

- E.g. Staff time administering payroll allocated based on overall FTE or number of accounting transactions
- Must be allocated based on actual benefit to each activity
- Must have a written cost allocation plan
- See the Uniform Guidance at 2 C.F.R. 200.405

Indirect Costs



Indirect Costs

Governed by the Uniform Guidance (2 C.F.R. 200.414)

- Costs incurred for a common purpose benefitting more than one objective & not readily assignable to your project
- Must be allocated to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived
- Examples: Accounting, staff salary for office administration, office supplies used for multiple projects

Indirect Costs: Key Points



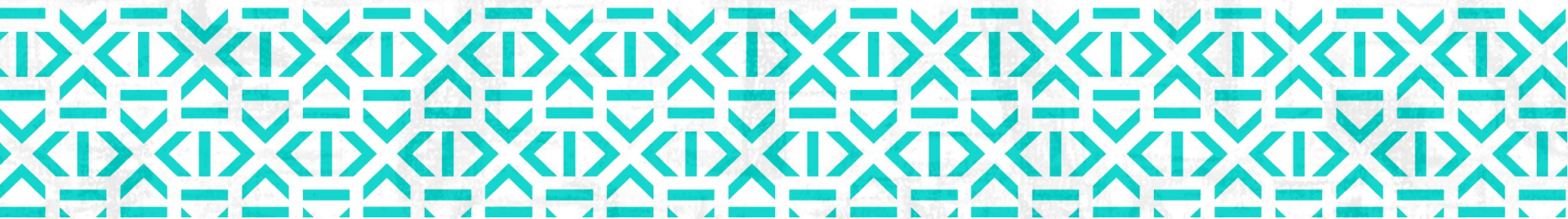
“Admin” budget line item \neq Indirect Costs

Indirect Costs do not increase the grant amount

To draw down Indirect Costs, you must include them in your funding application

Before you do, reach out to Homebase for more info

Timekeeping



Why complete a timesheet?

Without timesheets

- Difficult to effectively track & plan for costs
- Not compliant with grant requirements
- Inaccurate reimbursement requests
- May have to pay back grant funds

With timesheets

- Personnel costs are visible
- Employees spend less time trying to remember what actually happened
- Draw down grant funds accurately
- Avoid monitoring findings

Documenting Staff Costs

Must comply with Uniform Guidance (2 C.F.R. 200.430)

Support the distribution of the employee's salary or wages among specific activities or cost objectives

Incorporated into the recipient's official records

Reflect the total activity for the which the employee is compensated

Supported by a system of internal control to ensure that time charges are accurate, allowable, and properly allocated

Comply with recipient's accounting policies and practices

Time & Activity Reports

Reports must:

Account for actual time worked

Track time to eligible activities & eligible participants served

Align with back up documentation

Track ineligible costs in addition to eligible costs & account for total activity

Track time to multiple funding sources when applicable

Remember...

Track time by grant, client, & eligible activity

Track all time, including both eligible & non-eligible activities

Common Timekeeping Mistakes

- Billing 8 hours in a single day to one grant
- Billing a fixed percentage of time to a grant
- Not reconciling time & activity reporting with invoicing
- Excluding sick & vacation time
- Forgetting to record:
 - An eligible activity
 - An eligible grant
 - A project &/or client
 - Ineligible time & activities
- Missing documentation to accompany time & activity reporting

Activity

Timesheet

Name: Eli Hamilton

Period: 6/1/20 - 6/5/20

PROJECT	1-Jun-20		2-Jun-20	
GRANT 346298300	8:00			
GRANT 563739711			8:00	
Total	8:00		8:00	

Activity

Timesheet

Name: Eli Hamilton

Period: 6/1/20 - 6/5/20

PROJECT	1-Jun-20		2-Jun-20	
GRANT 346298300			3:15	case management
GRANT 346298300			2:00	training
GRANT 563739711			2:45	case management
Vacation	8:00	vacation		
Total	8:00		8:00	

Activity

Timesheet

	Name: Eli Hamilton			
	Period: 6/1/20 - 6/5/20			
PROJECT	1-Jun-20		2-Jun-20	
GRANT 346298300			3:15	monthly CM meeting with XX45463 and travel from office; complete case notes
GRANT 346298300			2:00	budgeting workshop 6 clients
GRANT 563739711			2:45	monthly CM meeting with XX86943 and travel from office, annual re-assessment data entry
Vacation	8:00	vacation		
Total	8:00		8:00	