

## Internal Wellness Checklist for the Continuum of Care (CoC) Program

The *Internal Wellness Checklist* was developed in an effort to assist homeless providers to proactively implement its FY \_\_\_\_ CoC grant(s), thereby ensuring compliance with applicable regulations codified at 24 CFR Part 578. It is also designed to assist with determining the current “health” status of this CoC grant. Grant recipients are strongly encouraged to utilize this checklist prior to submitting the required APR to the U. S. Department of Housing and Urban Development.

Recipient Name: \_\_\_\_\_

Project Name: \_\_\_\_\_ Grant Term: 1 or 2 Yrs. \_\_\_\_\_

Grant Number: \_\_\_\_\_ Grant Amt.: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Date APR is Due to HUD: \_\_\_\_\_ Date APR Submitted: \_\_\_\_\_  
(Not more than 90 days after the end of each CoC grant’s performance period)

---

### **General Recordkeeping**

- \_\_\_ 1. Executed Grant Agreement  
**24 CFR 578.23( c )**
- \_\_\_ 2. Documentation of Grant Amendment (request and approval, if applicable)  
**24 CFR 578.105**
- \_\_\_ 3. Executed Grant Agreements with Subrecipients  
**24 CFR 578.23( c )(ii)**
- \_\_\_ 4. Documentation subrecipients are not debarred  
**24 CFR 578.23( c )(4)(v)**
- \_\_\_ 5. Documentation of annual monitoring of Subrecipients  
**24 CFR 578.23( c )(8)**
- \_\_\_ 6. Executed Memorandum of Understanding with Service Providers  
**24 CFR 578.73(c )(3)**
- \_\_\_ 7. Project Application should be maintained - ensure costs charged against the grant are consistent with the approved budget items identified in the application  
**24 CFR 578.59(a)**
- \_\_\_ 8. Documentation that Annual Performance Report was submitted timely  
**24 CFR 578.103(e)**
- \_\_\_ 9. Written CoC Program Policies and Procedures to include:  
**24 CFR 578.103(a)**
  - \_\_\_ Intake/screening procedures  
**24 CFR 578.103(a)(3)and(4)**

- \_\_\_ Personnel Policies and Procedures  
**2 CFR 200.303, and 24 CFR 578.103(a)**
- \_\_\_ Termination Policy  
**24 CFR 578.91**
- \_\_\_ Grievance Policy  
**24 CFR 578.91**
- \_\_\_ Policy Privacy/Confidentiality Policy  
**24 CFR 578.103(b)**
- \_\_\_ Drug-Free Workforce Policy  
**24 CFR 5.105(d), 24 CFR 2424, 24 CFR 225**
- \_\_\_ Policy identifying the involvement of homeless/formerly homeless individuals  
**24 CFR 578.23( c )(3)**
- \_\_\_ Domestic Violence Policy  
**24 CFR 578.23(c)(4)(i)(ii), 24 CFR 578.103(a)(17)**
- \_\_\_ Housing First Policy, if applicable  
**HUD CPD Notice 14-02**
- \_\_\_ 10. Documentation of participation of homeless/formerly homeless individuals in policymaking  
**24 CFR 578.75(g)(1)**
- \_\_\_ 11. Documentation of compliance with environmental review requirements  
**24 CFR 578.99, 24 CFR 578.31**
- \_\_\_ 12. Documentation of compliance with fair housing requirements  
**24 CFR 578.87(b), 24 CFR 578.103(a)(14) and (17), 24 CFR 578.93( c )(1)**
- \_\_\_ 13. Documentation of other federal requirements (i.e. lead based paint, Section 3, Section 504), if applicable  
**24 CFR 578.99, 24 CFR 35, 24 CFR 578.99(b)**

**Financial Files**

- \_\_\_ 1. Written Financial Policies  
**2 CFR 200.302, 24 CFR 578.23(c )(5), 24 CFR 578.103(a)**
- \_\_\_ 2. Written Procurement Procedures  
**2 CFR 200.318 and 2 CFR 200.319**
- \_\_\_ 3. Written Conflicts of Interest Policy  
**2 CFR 200.317 and 2 CFR 200.318, 24 CFR 578.95(a)**
- \_\_\_ 4. Documentation of match (25% of total Grant Amount less leasing)  
**24 CFR 578.73(a)**
- \_\_\_ 5. Documentation of Grant Expenditures (during grant term and for approved items in application)  
**24 CFR 578.37, 24 CFR 578.103**
- \_\_\_ 6. Documentation of Indirect Cost Rate Proposal, if applicable  
**24 CFR 578.63(b), 24 CFR 578.103(a)(17)**

- \_\_\_ 7. Documentation showing compliance with the Single Audit Act  
**24 CFR 578.99(g), 2 CFR 200 subpart F**
- \_\_\_ 8. Documentation showing quarterly draw requests  
**24 CFR 578.85(c)(3)**
- \_\_\_ 9. Documentation showing program income was expended prior to HUD draw requests, if applicable  
**24 CFR 578.97(b)**

**Participant Program Files**

- \_\_\_ 1. Documentation participants are entered into HMIS or a comparable database  
**24 CFR 578.103(a)(3)**
- \_\_\_ 2. Documentation participant was screened via centralized or coordinated assessment systems  
**24 CFR 578.23(c)(9)**
- \_\_\_ 3. Documentation of Homelessness at intake  
**24 CFR 578.103(a)(3)**
- \_\_\_ 4. Permanent Supportive Housing -Documentation of disability  
**24 CFR 578.37(a)(i)**
- \_\_\_ 5. Transitional Housing- No more than 24 months of services provided except under documented extenuating circumstances  
**24 CFR 578.79**
- \_\_\_ 6. Documentation of ongoing assessment of services  
**24 CFR 578.75(e)**
- \_\_\_ 7. Documentation of examination of income (initial and recertification)  
**24 CFR 578.103(a)(7)(i)**
- \_\_\_ 8. Documentation of initial and follow-up Housing Quality Standards inspections  
**24 CFR 578.75(b)(2)**
- \_\_\_ 9. Leasing-Documentation that the unit/structure is not owned by recipient or subrecipient  
**24 CFR 578.49(a)**
- \_\_\_ 10. Leasing-Documentation lease is between agency and landlord  
**24 CFR 578.49(b)(5)**
- \_\_\_ 11. Leasing-Is there an occupancy agreement, lease or sublease in the file (for individual units)?  
**24 CFR 578.103(a)(17)**
- \_\_\_ 12. Leasing-Documentation of rent reasonableness for the period of approval for an assisted unit  
**24 CFR 578.49(b)(1)**
- \_\_\_ 13. Rents charged (including utilities) do not exceed HUD-Fair Market Rents  
**24 CFR 578.49(b)(2)**
- \_\_\_ 14. Documentation supporting the correct/current utility allowance schedule is used  
**24 CFR 578.103(a)(17), 24 CFR 578.49(a)(3)**

Grant #: \_\_\_\_\_

- \_\_\_15. Leasing-Documentation of occupancy charges with annual income calculations  
**24 CFR 578.77, 24 CFR 578.99(b)(6)**
- \_\_\_16. Rental-Documentation the participant has a an executed lease agreement with the landlord  
**24 CFR 578.77, 24 CFR 578.51(d)(e)**
- \_\_\_17. Rental-Documentation of rent reasonableness for the period of approval for an assisted unit  
**24 CFR 578.51(g)**

**NOTE:** For additional guidance, please refer to the following resource materials:

(1) Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program CoC regulations at 24 CFR Part 578, and

(2) Monitoring handbook 6509.2 REV-6 CHG-2 that can be accessed at:

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2).

Completed by:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Typed/Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

This document is to be maintained in the applicable CoC project file.