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)
Internal Wellness Checklist
Grant #: ____________________________

Personnel Policies and Procedures
2 CFR 200.303, and 24 CFR 578.103(a)
Termi nation 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 14-012

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 24 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(e)(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)
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 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 CBR. Part 578, and
(2) Monitoring handbook 6509.2 REV-6 CHG-2 that can be accessed at:

Completed by:

Signature: ___________________________ Date: ________________

Typed/Printed Name: ___________________________ Title: ____________________

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