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)
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___ 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)
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 CFR 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.