Intent to Renew (ITR)

2020 Renewal Applicants
for
U.S. Department of Housing and Urban Development (HUD)
Homeless Assistance Programs
Continuum of Care (CoC)

Chicago Continuum of Care Intent to Renew are due February 10th, 2020 at 4pm
Submit responses (with attachments) via SurveyGizmo

Executive Summary

The Evaluation Tool Subcommittee and All Chicago, the Collaborative Applicant, revised the Local Evaluation Instrument (LEI) and process in 2019, which will be used again in 2020. The new, revised LEI and process were updated to:

1. Simplify the LEI for agencies and All Chicago;
2. Minimize risk to the Chicago CoC by ensuring all agencies and projects are in compliance with HUD requirements and meet local programmatic and fiscal priorities and thresholds;
3. Create a collaborative process that provides and emphasizes proactive support and technical assistance to agencies and projects in order to strengthen the Chicago CoC.

The Local Evaluation Instrument is a two-part process with the following components:

1. Intent to Renew (ITR)
    a. Cover Page
    b. Certification Checklist
        i. Fiscal Criteria
        ii. Programmatic Criteria
        iii. HMIS Data Quality
        iv. HEARTH Act Compliance
    c. Initial Desk Audit
2. Local Evaluation Instrument (LEI)
    a. Project Performance Report
    b. Engagement of Persons with Lived Experience (PLE) Assessment

The Chicago Continuum of Care (CoC) is requiring agencies interested in renewing projects for funding in the F Y 2020 HUD Continuum of Care Program Consolidated Application to submit an Intent to Renew (ITR). An ITR is required for all projects to be considered for inclusion in the F Y 2020 Continuum of Care (CoC) Consolidated Application to the U.S. Department of Housing and Urban Development (HUD). HUD will review applications and make the final funding recommendations.

Renewal applicants are required to complete this ITR by answering all questions and providing the documentation that is required to pass the threshold. Renewal applicants that pass the threshold will be recommended for submission of the Local Evaluation Instrument in the spring of 2020 (including the Project Performance Report and Engagement of Persons with Lived Experience (PLE) Assessment), which will be scored and could be used for ranking projects during the FY2020 Notice of Funding Availability (NOFA) Competition. The renewal applicants will eventually submit their applications in e-snaps and be included in the HUD CoC competition.

All Chicago will review the ITR using the approved 2020 Chicago CoC Local Evaluation Instrument Process. For each part of the ITR, the agency/project will either receive a designation of "No Technical Assistance Needed" or "Technical Assistance Needed". Agencies/projects that need technical assistance will have the opportunity to receive technical assistance (TA) from All Chicago and be asked to resolve the technical assistance prior to commencement of the Local Evaluation Instrument. The agency/project is required to respond to all areas in which there is "technical assistance needed". If the agency/project responds but adequate changes are not submitted, the agency/project will be able to submit the Local Evaluation Instrument but will also be designated to receive further targeted technical assistance and, if necessary, a "Modifications Necessary" plan. If the agency/project cannot demonstrate the capacity to address the identified areas, then the agency's project(s) may not be recommended for renewal and may not be able to submit the Local Evaluation Instrument. Agencies/projects may utilize the appeal process to dispute a "technical assistance needed" designation, but it is recommended to commence with technical assistance in case the appeal is ultimately denied.

Projects are considered eligible for renewal in the 2020 CoC competition if:

- The current contract will expire in calendar year 2020
- The project has been included in the final 2020 Grant Inventory Worksheet (GIW);
- The project has passed all requirements outlined in the ITR;
- The project has met any other requirements outlined in the FY2020 HUD CoC Notice of Funding Availability (NOFA).

The CoC reserves the right not to renew projects that have exhibited serious capacity issues in prior grant years (including performance and financial problems); do not sufficiently participate in HMIS; have unresolved monitoring issues; and/or do not meet the priorities of the CoC.

Background Information

The U.S. Department of Housing and Urban Development (HUD) states that one of the primary responsibilities of the CoC is to develop a review process for selection and ranking criteria for prioritizing renewal and new projects for CoC funding. This is especially important for those communities that submit multiple renewal and new project requests to compete for funding.

In order to rank and select projects, communities should have a mechanism that demonstrates decisions were based on pre-established selection criteria that were logical and fair. Criteria may include but is not limited to capacity to implement and manage the proposed project, experience working with the target population, and cost effectiveness. In addition, all project applications should be evaluated and ranked based on the degree to which they improve the CoC's system performance. Any projects found to be lower performing should be reallocated to higher performing projects through the CoC local selection process.

HUD also notes that it is important that renewal projects meet minimum project eligibility, capacity, timeliness, and performance standards identified in the NOFA or they will be rejected from consideration for funding.

When considering renewal projects for award; HUD will review information in eLOCCS, APRs, and information provided from the local HUD CPD field office; including monitoring reports and audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

(a) Whether the project applicant's performance met the plans and goals established in the initial application, as amended;

(b) Whether the project applicant demonstrated all timeliness standards for grants being renewed, including those standards for the expenditure of grant funds that have been met;

(c) The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except dedicated HMIS projects that are not required to meet this standard; and

(d) Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

(a) outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;

(b) audit finding(s) for which a response is overdue or unsatisfactory;

(c) history of inadequate financial management accounting practices;

(d) evidence of untimely expenditures on prior award;

(e) history of other major capacity issues that have significantly affected the operation of the project and its performance;

(f) history of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and

(g) history of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

SurveyGizmo Instructions

A link to the Intent to Renew SurveyGizmo Form is located below. Please note that each agency is required to utilize a **username and password** to login to the form because All Chicago has pre-populated certain known fields including agency name, project name(s), and HMIS ID(s). The username and password is provided in the Intent to Renew release email communication. If you need help locating your username or password, contact CoCprograms@allchicago.org.

Click here for the Intent to Renew SurveyGizmo Form

Getting Started: How to SAVE AND CONTINUE with your Survey Responses

You should see a black bar running across the top of the page. On the right-hand side, inside the black bar, there is text that says "Save and Continue later." Click here and enter your email to receive a unique link to your survey. You can use this link to reopen your survey at any time before submission. You will only need to do this once and can use the same link each time. Your survey responses will save whenever you navigate between pages by clicking "Back" or "Next." (Hint: If you complete a page and close the survey before clicking on "Next," the work you did on that page will not be saved.)

Please be sure to keep the email that you receive containing the link. If you do not see the email, please check your junk mail folder. Sometimes you may experience a delay of a few hours in receiving the email from SurveyGizmo. The email will be from "noreply@surveygizmo.com." If you misplace this email or cannot locate your unique link, you will need to restart your survey. Check your email to ensure you've received the link before navigating away from the survey.

How to Pick Up Where You Left Off

You will only need to use the username and password given to you by All Chicago the **first time** you log into the form. After that, **use the "Save and Continue" feature to save your progress.** You will revisit the form using the link you receive after clicking on "Save and Continue." If you accidentally try to use the username and password to pick up where you left off, you will not see the work you already completed.

Navigating Through the Form and Important SurveyGizmo Tips

This SurveyGizmo form is designed so that each agency, including agencies that have multiple HUD CoC-Funded projects, will submit only once.

All Chicago has not enacted the "required question" feature in SurveyGizmo for any of the questions in this Intent to Renew form. By doing this, it is easy for you to skip ahead and navigate backwards and forwards through the form. However, even though the "required question" feature is not enacted, it is still necessary for you to provide an answer to every question that applies to your agency/project(s). Please ensure that you complete all blank fields. An "N/A" option has been provided if there are cases in which that is an acceptable response. Each "file upload" question also indicates if there are any scenarios in which a project may skip without uploading a document.

For the Certification Checklist questions, if the answer to any question is "No" for one or more of the agency's projects, select "No" and list which project(s) the "No" response applies to. If the agency only has one HUD CoC-Funded Project, you do not have to enter the project name each time you answer "No" since All Chicago will be aware that you have only one project. However, if the agency has more than one HUD CoC-Funded Project and you select “No,” ensure that you indicate which project(s) the “No” response applies to. Click on “Add Another Project” if you need to list more than one project name.

File Naming Conventions

Please use the following naming convention with the files that you upload for Attachments A-I:
Attachment Letter_Agency Name (or acronym)_HMIS ID(s) or Project Name(s).

For example, to upload attachment E for projects with HMIS IDs 1111 and 2222, the file would be named: Attachment E_Agency Name_1111 2222.

2020 Intent to Renew - Cover Page

Chicago Continuum of Care

Lead Agency Information

Agency Name:
Address:
City: ______ State: ______ Zip: ______
Phone: ______ Fax: ______

Contact Person(s) for Questions about this ITR

Identify one or two people to act as a liaison between All Chicago staff and agency staff regarding any follow-up that occurs to resolve "technical assistance needed" designations. SurveyGizmo allows you to complete this field more than once.

Name: ______ Name: ______
Phone: ______ Email: ______ Phone: ______ Email: ______

Executive Director

Name: ______
Phone: ______ Email: ______

Project(s) Information

The SurveyGizmo form will pre-populate the number of projects funded at your agency and key information that is already on file for each project, such as project name and HMIS ID. Do not delete the pre-populated information. Complete all of the missing information.

Number of Projects**:** ______

Complete the following information for *each* project:

Name of Project: ______ HMIS ID: ______
Project Address (Project-based only): ______
Program Model Type (HUD): ______ Chicago Program Model Type: ______
Grant Amount: ______ Grant Start Date: ______ Grant End Date: ______
What is the funding source for the housing component of the project? (HUD CoC Leasing BLI, HUD CoC Rental Assistance BLI, units owned by the agency, LIHTF, CHA, IDHS, VA, Other – Please Specify) ______
Note: This information is needed by All Chicago to evaluate Attachment F (occupancy charges and rental payments) in the Desk Audit component of this Intent to Renew.
Has the project consolidated in 2018 or 2019? ______
Is the agency interested in consolidating this project with another if the opportunity is available in the FY2020 NOFA?

______

Has the project made any major changes in the last 12 months, or expects to make changes in the next 12 months, such as grant consolidation; change in service priorities or population; or loss of funding? If yes, detail these changes.

______

Intent to Renew

Please confirm whether you intend to renew your project application(s) in the 2020 grant cycle. If you decide not to renew a project in the 2020 grant cycle, you do not have to submit responses for that project in the rest of the form. However, if you will renew at least one project, the rest of the form must be completed.

☐ **Yes, the project(s) would like to be considered for renewal**

☐ **No, this project will not be renewed in the 2020 grant cycle.** *If a project does not renew and would like to receive future funding, it will have to reapply through a competitive grant process and the project type may no longer be eligible.*

Name and Signature of Person who completed the Intent to Renew

There is no requirement regarding who may sign, but it must be a person within the agency who has appropriate authority to do so. Provide the title and the date of submission.

I certify on behalf of my agency that all information contained in this application is accurate and true, based on our current project records. I understand that falsifying or failing to provide accurate information will have a negative impact on my overall review and may result in removal from the Continuum of Care Application to HUD.

Name	Signature
Title	Date

2020 Intent to Renew – Certification Checklist

Chicago Continuum of Care

I Fiscal Criteria

HUD Monitoring Findings	**Yes**	**No**
1. Were any of the agency's projects monitored by HUD in calendar year 2017, 2018, or 2019?	☐	☐
2. For any of the projects monitored in calendar year 2017, 2018, or 2019, were there any HUD findings?	☐	☐
3. Have all the HUD findings from 2017, 2018 or 2019 been resolved?	☐	☐

This section relates to all HUD monitoring of both fiscal and programmatic requirements.

If the answer to #1 is "No," questions 2-3 will be skipped.

Attachment A: HUD Monitoring Documentation (if applicable)

A project that has been monitored by HUD in calendar year 2019 will submit the attachments listed below. A project that was monitored by HUD in 2017 or 2018 and still has open/unresolved findings will also submit the attachments listed below. A project that has not been monitored by HUD since 2017 or that had all its findings resolved since being monitored in 2017 or 2018 will **not** submit attachments.

Attach:

🗎 *HUD Monitoring Letter (indicating findings or lack thereof) – Submit if monitored in calendar year 2019 or if there are open/unresolved findings from 2017 or 2018*

🗎 *HUD close out letter (indicating resolution of findings) – Submit if there was a finding in 2019 that has been resolved*

🗎 *Correspondence submitted to HUD to attempt to resolve the finding(s) as well as any additional response(s) from HUD – Submit if there are any unresolved findings from 2017, 2018 or 2019*

If the answer to #3 is "No," explain in a narrative why the finding(s) remain unresolved. An agency will receive a "Technical Assistance Needed" designation if there are unresolved HUD Monitoring findings and sufficient progress has not been made towards resolving the findings with HUD.

Criteria

- The program has documentation of HUD monitoring and has evidence of steps taken to work towards or complete the resolution of any findings in a timely manner.

Fiscal Year

4. What is your agency's fiscal year?
Provide the start and end date of the agency's fiscal year. This question is informational. By receiving this information, it is possible to determine if the audited financial statement attached in the following question is within 9 months of the end of the fiscal year.

Recent Financial Statement	Yes	No
5. Does the agency have an annual financial statements audit completed within 9 months of the end of the fiscal year?	☐	☐

As an example, if the agency's most recent year end is 6/30/2019, you will likely be able to attach the audit for 6/30/2019. If not, attach the audit for 6/30/2018 and make sure that this audit was completed by March 31, 2019. As another example, if the agency's most recent year end is 12/31/2019, you will likely attach the audit for the year that ended 12/31/2018 because the audit for the year that ended 12/31/2019 will not have been completed yet. Make sure that the 12/31/2018 audit was completed by September 30, 2019.

If the answer to #5 is "No," explain why a financial statements audit has not been completed within 9 months. Indicate when the financial statements audit is expected.

Attachment B: Annual Financial Statement Audit

Attach:

🖹 *Most recently completed audited financial statement (complete package)*

<u>Criteria</u>

- An audit is completed within 9 months of the end of the agency's fiscal year.
- The audit opinion indicates that the organization's financial statements are fairly presented in accordance with generally accepted accounting procedures (GAAP).
- The audit opinion does not include any substantial doubt about the organization's ability to continue as a going concern.

Single Audit	Yes	No
6. For the most recently completed audit year, was the organization required to undergo a single (Uniform Guidance) audit?	☐	☐

In general, agencies with $750,000 in federal expenditures in a fiscal year are required to undergo a single (Uniform Guidance) audit. If the agency is required to have a single audit, **Attachment C** is a copy of the most recent single audit (which should be for the same fiscal year as the attached financial statement audit). If the agency is not required to have a single audit, then determine which of the three letters (Auditor's management letter; Auditor's Communication with Those Charged With Governance – AU 260, or Communicating Internal Control Related Matters Identified in an Audit – AU 265) were issued by your auditors for the relevant fiscal year and attach all such letters as **Attachment C**. At a minimum, attach the AU 260 letter. If you have any questions regarding these letters, contact your auditor for clarification.

Please note that a single audit is different than a financial statement audit. However, most times auditors will package both together. If you are required to submit the Single Audit report and it has already been submitted with Attachment B, indicate this in SurveyGizmo. You will not be required to submit the same documentation twice. However, if the Attachment B did not include the Single Audit Report, submit it for Attachment C.

An agency will receive a "Technical Assistance Needed" designation if the financial risk assessment completed by All Chicago and described below results in a "High Risk requiring technical assistance" designation.

Attachment C: Single Audit Report or Management Letter

Attach:

- *Single audit report (complete package)*

  OR

- *If not required to undergo a single (uniform guidance audit), submit one of the following:*
  - Auditor's management letter (if issued by your auditor)
  - Auditor's Communication With Those Charged With Governance, referred to as an AU 260 letter (this communication is required to be issued in connection with an audit)
  - A "Communicating Internal Control Related Matters Identified in an Audit" letter, referred to as an AU 265 letter (if issued by your auditor)

Criteria

The single audit or management letters will be reviewed along with the financial statements to develop a financial risk score for each agency. The items that factor in the risk assessment score are as follows:

- In the case of the single audit, the following items will factor into the financial risk score.
  - Whether the reports were issued within 9 months of fiscal year-end
  - Any modification of the financial statement opinion
  - Any qualification of opinion with respect to a federal program.
  - Any audit findings with that are required to be disclosed under 2 CFR 200,516(a)
  - Any material weaknesses with regards to financial statements or federal awards
  - Any significant deficiencies with regards to financial statements or federal awards
  - Whether the organization is determined to be a low-risk auditee
- If no single audit is required:
  - Any issues with management with respect to the audit.
  - Any material weaknesses or significant deficiencies.

2020 Financial Risk Assessment

The Financial Risk Assessment process evaluates the financial statements, single audits and management representation letters of CoC funded agencies to develop a risk score for each agency. The risk assessment methodology was developed in collaboration with the CoC CFO workgroup. This risk score will determine whether an agency requires technical assistance prior to approval of its project renewal applications and will determine whether an agency will be selected for financial monitoring.

Method:
All Chicago will review the financial statements and single audits of each agency. If a single audit is not required, All Chicago will review the following documents (if issued): auditor's management letter, AU 260 letter, and AU 265 letter. These documents will be scored based on the following scoring system.

Q. #	Risk Evaluation Item	Risk Points	
1	**Single Audit Required?**	1	if No
2	**Audit completed within nine months of year end?**	3	if No
3	**Financial Statements Auditor's Report**	3	if modified
4	**Single Audit Report**	3	if modified
5	**Internal control # of material weaknesses**	2	per weakness
6	**Internal control # of significant deficiencies**	1	per weakness
7	**Internal control # of instances of material noncompliance**	2	per instance
8	**Fed awards # of material weaknesses**	2	per weakness
9	**Fed awards # of significant deficiencies**	1	per weakness
10	**Low Risk Auditee? (Yes or No)**	1	if No

Under this scoring methodology, a perfect risk score is 0.
Agencies will be classified as follows:

- Low Risk: 0 -1 points
- Medium Risk: 2 -3 points
- High Risk: 4 points or more
- High Risk requiring technical assistance: 4 or more points and the agency receives risk points for questions 2, 3 or 4 (modified/qualified opinion on the single audit or financial statement audit report).

Appeals:
All agencies will receive the detail of their risk score calculation. All components of the risk score may be appealed to the CFO workgroup, through All Chicago. Appeals can include mitigating circumstances that led to risk points being assessed. For example, an audit may have been completed after nine months due to issues with the auditor.

Technical Assistance and Monitoring:
Agencies classified as High Risk requiring technical assistance must receive technical assistance prior to approval of its project renewals and demonstrate the capacity to address any issues which can result in questioned or disallowed costs. If after technical assistance the agency cannot demonstrate the capacity to address the identified issues, then the agency's grant(s) may not be recommended for renewal.

Agencies classified as High Risk may be selected for financial monitoring and technical assistance after project renewal. Agencies classified as Medium Risk may also be selected for focused technical assistance and/or monitoring.

Match	**Yes**	**No**
7. Will your agency be able to provide the match requirement for all of your renewal projects?	☐	☐

Match must equal 25 percent of the total grant request including admin costs but excluding leasing costs (i.e., any funds identified for Leased Units and Leased Structures). Match contributions can be cash, in-kind, or a combination of the two; and, match must be used for an eligible cost as set forth in Subpart D of CoC Program interim rule.

For an in-kind match, the recipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or sub recipient had to pay for such items with grant funds, the costs would have been eligible. If third party services are to be used as match, the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU) before the grant is executed documenting that the third part will provide such services and value towards the project.

II | Programmatic Criteria

Coordinated Entry System (CES)	Yes	No	N/A
8. Do all of the agency's projects participate in the CES for individuals, families or youth?	☐	☐	☐

Answer "Yes" if the project does any **one** of the following:

- Refers clients to access points when they are seeking assistance
- Ensures all clients are assessed through the Coordinated Entry System
- Has a skilled assessor on staff to conduct assessments
- Requests matches for all vacancies through Coordinated Entry
- Only accepts clients through Coordinated Entry for vacancies
- Utilizes Coordinated Entry transfer requests for all transfers
- Fulfills matching requests
- Coordinates outreach efforts
- Coordinates or participates in System Integration Team meetings
- Oversees the Coordinated Entry System
- Performs housing system navigation

A project will receive a "Technical Assistance Needed" designation if it does not participate in CES as defined above.

If the answer to #8 is N/A, please explain why this question does not apply to the project.

Annual Performance Report (APR)	Yes	No	N/A
9. Was the last APR submitted on time for each project?	☐	☐	☐
10. Has the last APR been rejected by HUD for any project?	☐	☐	☐

11. Due date of last APR for each project:

If the answer to #9 or #10 is N/A, please explain.

The APR must have been submitted to HUD in Sage. All Chicago will use Sage to verify that the status of the APR is "Submitted," "Accepted," or "Awaiting Director Review." Explain any extensions or new dates issued by HUD.

A project will receive a "Technical Assistance Needed" designation if an APR was submitted late or rejected by HUD. If the APR was submitted on time and it has not been accepted due to a delay by HUD, please inform All Chicago of this in the narrative and All Chicago will not require technical assistance.

Desk Audit

The 2020 Intent to Renew Desk Audit topics are listed below. Each agency will submit once. However, with each topic there will be an opportunity for you to upload multiple responses in case you have different documentation for different projects. The criteria that All Chicago will use to review each attachment has been provided below. The last two attachments are informational, but still required.

Attachment D: Recordkeeping Policy

Attach the following:

🖹 The agency's policy for keeping program participant records.

Criteria

- The period of time client records are kept must be in accordance with 24 CFR 578.103(c)
- The type of client records kept must be in accordance with 24 CFR 578.103(3-9)

Attachment E: Conflict of Interest Policy

Note: The purpose is to ensure all agencies have a written policy and that disclosure procedures are in place. Due to the legal nature of conflicts of interest, All Chicago will not provide Technical Assistance on the content of the submitted policies but may advise agencies to seek legal review of their policies.

Attach the following:

🖹 The agency's conflict of interest policy.

🖹 The agency's conflict of interest disclosure form.

🖹 If not included in the first attachment, the process used to ensure the conflict of interest disclosure is signed by staff and board members. Also describe the frequency with which staff and board members sign the disclosure.

🖹 If not included in the first attachment, the process used to ensure that HUD has the most updated version of the agency's policy on file.

Criteria

- The agency has a conflict of interest policy in accordance with 24 CFR 84.42 and 24 CFR 578.95.
- The agency has a process to ensure the conflict of interest disclosure is signed by staff and board members.
- The agency has considered how frequently to require staff and board members to sign the conflict of interest disclosure.
- The agency has considered the timeframe in which each staff or board member is required to sign the conflict of interest disclosure upon beginning their involvement with the agency.

Attachment F: Occupancy Charges and Rental Payments
Reminder: You may submit different documents for different projects within your agency. Multiple uploads will be allowed.

Attach the following:

- The written formula, set of rules, or template form(s) the project uses to calculate the occupancy or rental payment of the participants, including the income calculation.

*Note: This is not a request for the rent reasonableness process. This is to demonstrate what the **participant's portion** of the rent is or the **participant's occupancy charge**.* Some projects do not charge rent or have an occupancy charge. If this is the case, upload the rule or statement where this is written for your project.

- A description of the process the project uses to re-evaluate occupancy charges or rent amounts, including the frequency.
- A description of how utility costs are paid for the units in which program participants reside. This description must include whether utilities are paid by the project or participant, what budget line is used if paid by the project, which utilities are covered, how the project factors utility costs into the participant's occupancy or rent amount, and, if applicable, how the project calculates utility reimbursements.

Criteria

- Projects with leasing budget line items may impose occupancy charges but are not required to. If occupancy charges are imposed, they must be in accordance with 24 CFR 578.77 (b). The project may charge less than the full HUD-calculated amount but all participants must be treated the same.
- Projects with rental assistance budget line items must charge participants rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1).
- Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a)
- Projects must examine a program participant's income initially and annually thereafter.
- Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified (24 CFR 578.77(c)(2)). For calculation of occupancy charges, income must be examined initially, and if there is a change in family composition or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge adjusted accordingly (24 CFR 578.77(b)(4)).
- Projects may not charge program participants program fees.
- If a project has a leasing budget line item and utilities are included in the rent, the project pays for the utilities with the leasing budget.
- If a project has a leasing budget line item and utilities are not included in the rent, the following occurs: 1) if the project pays for the utilities, they are paid with operating funds or other sources, 2) if the participant pays for the utilities, a utility allowance is applied to the occupancy charge calculation.
- If the project has a rental assistance budget, the project may pay the utilities using rental assistance funds or non-CoC funds, or the participant may be required to pay for the utilities.
- If utilities are not included in the rent for a project that uses a leasing budget or rental assistance budget, the following occurs: 1) a reasonable utility consumption amount is calculated and factored into the participant's rent contribution or occupancy charge; 2) if when the reasonable utility consumption amount is subtracted from the participant's rent contribution or occupancy charge, the calculation

equals a number less than $0, a utility reimbursement is paid to the participant. These calculations must be in accordance with the guidance provided in HUD Notice CPD-17-11, "Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care (CoC) Program when the Program Participant is Responsible for the Utilities."

- Eligible utilities include gas/oil, electricity, water, and sewage. Utilities besides these, including telephone, internet, cable, and others are not paid with CoC funding.

Exceptions

- If the Chicago Housing Authority (CHA) calculates the participants' rental payments in a project, the project must describe the process used to receive the determination from CHA. If possible, also submit the formula that the CHA uses to make the determination. Describe the project's role, if any, in the rental payment process of the participants.

Attachment G: Connection to Mainstream Benefits, including SSI/SSDI Outreach, Access, and Recovery (SOAR)

Please note that projects are expected to have a process to connect participants to mainstream benefits, but that it is not required to utilize SOAR. The parts of this question that relate to SOAR are informational, which means that All Chicago will not assign any required technical assistance on it.

Attach the following:

🖹 A description of the process used to assess and connect participants to mainstream benefits, including whether the project uses a single application for multiple benefits.

🖹 A description of the process used to assess and connect participants to SOAR. (This part of the question is informational)

🖹 If the project has SOAR-trained staff, a description of the process used to track outcomes related to SOAR. (This part of the question is informational)

Criteria

- The project assesses whether participants would benefit from connections to mainstream benefits or SOAR.
- For participants who would benefit from connections, the project has a method for ensuring mainstream benefits are received or renewed.
- The project uses a single application for multiple benefits.
- For participants who would benefit from SOAR, the project has SOAR-trained staff or an established referral or partnership for SOAR.
- The project has a process for tracking outcomes related to SOAR. Online Application Tracking (OAT) is one example of this although other methods may be used.

Informational Questions

Please note that the following questions are *informational*, which means that All Chicago will not assign any required technical assistance on these topics. The purpose is to gather information. If an agency does not have a current policy or practice related to an aspect of these questions, it is acceptable to indicate this and outline what the agency intends to do moving forward. After reviewing all the submissions, All Chicago may have questions to discuss with some agencies and may offer Technical Assistance at a later date based on information gathered through this process.

Attachment H: Supportive Services (Informational)
Reminder: You may submit different documents for different projects within your agency. Multiple uploads will be allowed.

Attach the following:

🖹 A service list or menu of services, including all supportive services provided by the agency, a partner, or a non-partner.

🖹 A description of the process used to document the services and assistance provided to each program participant. *Please note that this pertains to participant-level file documentation.*

🖹 The form used to log and track referrals to external services or resources. If the project does not use a form, instead describe how referrals are documented in the participants' files.

🖹 A written description of how the project assesses the needs of the participants annually and uses the information to adjust services.

🖹 The form the project uses to annually assess the services needs of program participants. *Note: this is not a request for the Individual Service Plan template. If the project's process does not include using an assessment to inform the development of the service plan, skip this bullet point.*

- If the project uses multiple assessments, submit each one.
- If the project uses an electronic assessment, export a blank template if possible. If not possible to provide a blank template, instead provide a description of the assessment including the categories that are assessed.

Criteria

- The service list or menu of services encompasses all the supportive services indicated in section 4A. of the project's FY2019 Renewal Application.
- The project has standards/expectations for staff to follow regarding how to document the services that are provided to each individual program participant and that this documentation is maintained in the program participants' files. This is in accordance with 24 CFR 578.103(a)(7)(i).
- The project maintains documentation in each program participant's file of referrals made to external services or resources.
- The project assesses the service needs of participants in accordance with 24 CFR 578.53(a)(2).
- Assessments of service needs are completed annually and are signed and dated by staff and program participants.
- The annual assessment in HMIS is one component of assessing a participant but is not enough by itself to *fully assess a participant's service needs*. Therefore, the project has a form or process that addresses a range of topics in addition to completing the annual assessment in HMIS.

Attachment I: Internal Data Standards (Informational)

<u>Attach the following:</u>

🖹 A description of the agency's Internal Data Review process and/or practices, including details such as how often data is reviewed to ensure accuracy, completeness and timeliness, as well as who on the team is involved in the process.

- If such a process does not exist, please submit a brief narrative of what your current practices are.

🖹 A description of the agency's Internal Communication Plan for all HMIS-related and HMIS-adjacent (ie. Coordinated Entry) communications to users within the agency.

- If such a process does not exist, please submit a brief narrative of what your current practices are.
- If the agency does not use HMIS, explain the internal communication plan for your database system.

🖹 A description of the agency's HMIS (or other database for Domestic Violence agencies) employee training process for new users Please note that this is not a request for general new employee onboarding and that it only refers to the process of training new users.

- If such a process does not exist, please submit a brief narrative of what your current practices are.

🖹 The intake assessment used by the agency. If different projects use different assessments, submit each one.

- 2020 HUD Data Standards went into effect in October 2019, as such, intake packets should be updated to reflect the new standards.
- Please note that you do NOT need to re-submit all the intake documents that were requested in Attachment D of the 2019 ITR. This request is for the intake assessment only.

<u>Criteria</u>

- The project has some type of mechanism to review data whether it be internal case reviews or weekly/monthly staff meetings.
- New HMIS/database users are aware of basic information regarding their project and of the agency's own data protocols.
- The agency has updated their intake form to reflect changes from the 2020 HUD Data Standards.

III | HMIS Data Quality

The Continuum of Care (CoC) Program Interim Rule (24 CFR 578) places a high emphasis on having a functioning and comprehensive Homeless Management Information System (HMIS) in the CoC jurisdiction. HMIS is critical to gathering unduplicated, aggregated data on homelessness in the community both for the CoC and Emergency Solutions Grant (ESG) Programs. HMIS data is crucial in identifying and housing individuals through the Coordinated Entry System (CES), and assessing system strengths and needs in addressing and ending homelessness.

All Chicago as the HMIS Lead recognizes the challenges with the data quality process throughout 2019. Due to these challenges, the 2020 ITR excludes any questions related to data quality. Questions about erroneous child-only entries, utilization, timeliness and miss data elements have been removed. All Chicago is working to refine the process in 2020 and anticipates including questions about data quality in the 2021 ITR.

HMIS Implementation	**Yes**	**No**	**N/A**
12. Do all of the agency's projects have an HMIS ID created in ServicePoint?	☐	☐	☐

If no, please explain why:

Agencies serving survivors of domestic violence and legal service agencies are not expected to answer this question; select N/A above if this is applicable.

IV | HEARTH Act Compliance

This section of the ITR asks questions of all renewal projects to ensure compliance with the requirements of the HEARTH Act. (Please note, this section does not encompass all changes under the HEARTH Act and it is recommended that all projects should review the Act in its entirety).

Policies & Procedures

Does the project have the following HEARTH required policies and procedures in place?

Confidentiality	**Yes**	**No**
13. The agency agrees to maintain the confidentiality of non-HMIS records pertaining to any individual or family who receives family violence prevention or treatment services with HUD CoC funding.	☐	☐
14. The agency and listed project(s) take measures to ensure that the address or location of any family violence shelter project in the Chicago CoC, which is assisted with HUD CoC funds, will not be made public, except with written authorization of the person responsible for the operation of such project.	☐	☐

HUD requires that agencies agree to maintain confidentiality of any individual or family who receives family violence prevention or treatment services. Please certify that your agency agrees to do so.

A project will receive a "Technical Assistance Needed" designation if it does not agree to maintain confidentiality.

Person of Lived Experience Participation	**Yes**	**No**
15. Does the agency currently have on its board of directors or other equivalent policymaking entity a participant who has experienced homelessness as defined by HUD? If no, please explain why:	☐	☐
16. Has the homeless or formerly homeless individual been homeless or a resident of an agency project in the last 10 years?	☐	☐
17. Is the homeless individual currently experiencing homelessness or a current program participant?	☐	☐
18. Please provide the name (first name, initial of last name) or HMIS ID of the homeless or formerly homeless individual.		

The CoC Interim Rule, 578.75(g)(1), requires that, "Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions."

A project will receive a "Technical Assistance Needed" designation if it does not provide for participation of a homeless or formerly homeless person on the Board of Directors or other equivalent policy making entity.

Family Projects Where There is at Least One Parent & One Child	Yes	No
In any project, does the agency serve at least one household that consists of one parent and one or more children 18 and under?	☐	☐
19. Does the agency and applicable project(s) accept all families with children 18 and under without regard to the age or gender of any child?	☐	☐
20. Does the agency and applicable project(s) ensure that a staff person has designated responsibility for ensuring that children are enrolled in school and connected to appropriate services in the community?	☐	☐
21. Are the agency and applicable project(s)' policies and practices consistent with the laws related to providing education services to individuals and families?	☐	☐
22. Does the case management model include developmentally appropriate intake and service planning for each member of the family as an individual (including bio psychosocial or other appropriate assessment)?	☐	☐
23. Are services delivered where the child is living or does the project provide a space for home based, early childhood services?	☐	☐
24. Does the agency and applicable project(s) facilitate on-site development screening for all children that enter the program?	☐	☐
25. Does the agency and applicable project(s) actively assist the families in accessing child care?	☐	☐
26. Does the agency and applicable project(s) have written procedures that require agency workers to provide guidance and support around enrolling children in pre-school or school?	☐	☐
27. Does the agency and applicable project(s) connect families to Chicago Public School's Students in Temporary Living Situations (STLS) liaisons and/or inform families of their homeless student rights (this applies to all program model types EXCEPT Permanent Supportive Housing and Rapid Rehousing, whose participants do not qualify for the STLS Program)?	☐	☐
28. Does the agency and applicable project(s) assess, track and monitor the health of children in the program, including providing assistance with connecting to health care provider(s)?	☐	☐
29. Do the program's administrative, service-delivery, and living facilities utilize space and materials to promote healthy parent-child engagement that fosters healthier relationships?	☐	☐

If an agency does not serve at least one household that consists of one parent and one or more children 18 and under, the agency will be able to skip this section due to non-applicability. Family projects should be able to demonstrate compliance with these requirements in their intake policies, referral documentation, MOU/Linkage agreements, and Individual Service Plans (ISPs).

A project will receive a "Technical Assistance Needed" designation if it does not verify all procedures listed in this question.