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# HUD COC RECIPIENT & SUBRECIPIENT POLICIES

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## DOCUMENTATION

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Q. WHAT ARE THE NECESSARY DOCUMENTS ORGANIZATIONS MUST PROVIDE WHEN ENROLLING A CLIENT FOR RENTAL ASSISTANCE IN PERMANENT SUPPORTIVE HOUSING (PSH)?

ANSWER:

- Vending code to certify the apartment complex is an approved vendor.
- Proof of HQS inspection and date- *first page, proof of passing and date ONLY*
- Proof of lease start and end date.
- State needed security deposit
- Need to identify fair market rent
- Need to highlight the amount requested in Housing Assistance payments, along with requested utilities and what is the remaining tenant portion
- Document and show calculation for requested Administrative fee.
- Document any damages that the organization will bill for
- Must show rent reasonable study.
- Intake form that documents income eligibility
- Proof of disability-*use HUD CoC documentation guidelines*
- Document homelessness- *use HMIS, agency letter or self-certification*

Q. WHAT ARE THE NECESSARY DOCUMENTS ORGANIZATIONS MUST PROVIDE WHEN ENROLLING A CLIENT FOR RENTAL ASSISTANCE FOR RAPID RE-HOUSING (RRH)?

ANSWER:

- Vending code to certify the apartment complex is an approved vendor
- Proof of HQS inspection and date- *first page, proof of passing and date ONLY*
- Proof of lease start and end date
- State needed security deposit
- Need to identify fair market rent
- Document income eligibility- *must use MSHDA form 8 for all tenants plus MSHDA forms 9 & 10 if client has income.*
- Document Homelessness using *MSHDA Form 2 "Homeless Certification"*
- Proof of disability-use HUD CoC documentation guidelines
- MSHDA Cover sheet

Q. HOW IS A DISABILITY DOCUMENTED?

ANSWER:

HUD provides a [definition of disability](#) the certification of disability must come from a licensed practitioner such as LMSW, Medical MD or PHD, Licensed Professional Counselor (LPC), Licensed

Nurse Practitioner (LPN). [The HUD documentation forms](#) can be used to document disability. *Disability only needs to be documented at the entrance into the program, not updated every year.*

#### Q. HOW IS HOMELESSNESS DOCUMENTED?

##### ANSWER:

The gold standard is a history of homelessness documented in HMIS. If this is not possible, the next best is an agency verification using an agency form letter (for PSH) or the MSHDA form (for RRH) as indicated above. As a last resort, the client may self-certify.

#### Q. HOW IS ZERO INCOME DOCUMENTED?

Staff can determine if it is possible to obtain DHS documentation, especially if the client receives food stamps. Clients must go through the SER process and it may be possible to obtain documents that way. As a last resort, written self-certification of income when it is zero income is acceptable.

#### Q. HOW IS HOMELESSNESS DOCUMENTED FOR DOMESTIC VIOLENCE SURVIVORS?

##### ANSWER:

Category 4 is an individual or a family fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life threatening conditions related to violence who have no identified subsequent residence and lack the resources and support networks needed to obtain other permanent housing.

Self-certification is acceptable in these cases for RRH and PSH. If the survivor is referred from Safehouse, they automatically fit into the Category 1 HUD definition for literally homeless. If the survivor has police records, those can be added to their file. Please note that the survivor does not have to be fleeing from an intimate partner only.

### ELIGIBLE COSTS & LINE ITEMS

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#### Q. WHAT ARE ELIGIBLE COSTS UNDER THE RENTAL ASSISTANCE LINE ITEM?

##### ANSWER:

- Housing assistance payments
- Approved utility payments
- Security deposit
- Damages
- Application fees
- Administration of rental assistance

#### Q. WHAT ARE ADMINISTRATIVE FEES?

##### ANSWER:

Expenses related to the overall administration of the CoC grant, such as management, coordination, monitoring, evaluating activities and environmental review.

#### Q. HOW MANY APPLICATION FEES WILL BE PAID?

##### ANSWER:

Combined total of application fees cannot exceed \$100. If agency needs a quick turnaround, they can pay the application fee and then bill the housing commission on the next draw request. Tenant may only refuse 1 unit that they are approved for, if they refuse to move into all units approved for, they are terminated from the program.

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Q. CAN COC FUNDS BE USED TO PAY HOLDING FEES?

ANSWER:

No, agencies pay holding fees with their own funds. Once holding fees are returned to agencies, it is theirs to keep.

Q. IS RENT REASONABLE DETERMINED BY GROSS OR CONTRACT RENT?

ANSWER:

Gross rent plus utilities based on the current utility schedule published by the AAHC.

Q. CAN BEDBUG ERADICATION BE CONSIDERED AN ELIGIBLE COST?

ANSWER:

No, maintenance and repairs is not an eligible cost of rental assistance and could not be used to pay for pest control. Landlords are typically responsible for covering these costs. In the case that this is not possible, agencies would have to use non-CoC program funds to cover the costs..

Q. DO SECURITY DEPOSITS NEED TO BE REIMBURSED TO AACH AFTER CLIENT COMPLETES THE LEASE?

ANSWER:

No, tenants keep security deposits when they leave the program.

Q. CAN FURNITURE BE AN ELIGIBLE OPERATING COST UNDER A LEASE?

ANSWER:

Yes, but the furniture must stay with the agency and cannot go with the tenant when they move out. Agencies can bill under the Supplies line item for furniture.