

Mount Vernon, NY
Continuum of Care (CoC) Program

The CoC Program assists homeless people with disabilities to gain entry to housing and to achieve residential, economic, and emotional stability. This goal is accomplished by providing safe, secure permanent housing and a broad range of supportive services. Program participants pay 30% of household income. The CoC subsidy covers the balance of the rent payable to the landlord.

City of Mount Vernon currently has 5 CoC grants:

- CoC RA-05
- CoC RA-06
- CoC RA07
- CoC Shallow Rent
- CoC RA-VETS

ACCOUNTING PROCEDURES

CLAIM FORMS

Claims should be received by the City of Mount Vernon no later than 30 days after the end of the month in which services were provided with the required supporting documentation.

Time Sheets and Activity Logs are required for all staff charged to the grant or counted as match. Time sheets and Activity Logs must cover the entire pay period even if only a small portion of the staff person's time is charged to the grant during the pay period.

REIMBURSEMENTS

Reimbursement payments are sent to subrecipients within thirty (30) days after receipt of subrecipient claim.

The most common cause for a delay in reimbursement is lack of clarity in the documentation submitted with the claim form. The URA will contact the subrecipient if the claim is not clear or if corrections need to be made. This will cause a delay in reimbursement. Subrecipients will need to follow-up with URA finance staff to resubmit claims with corrections and supporting documentation.

MATCH

All eligible funding costs, except leasing, must be matched with no less than a 25 percent cash or in-kind contribution. If third-party services are to be used as a match, the subrecipient and 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 party will provide such services and value towards the project.

Service match is documented using the following forms of documentation:

Service match log. On a yearly basis, every service provider agency that works with CoC clients is required to submit a tracking log documenting the total of all services provided on a year-to-date basis for all clients on that program. Printouts must include a total listing of all services received and the value

of those services. The URA finance staff will review the printout to ensure that the match is for eligible activities.

In calculating the amount of the matching supportive services, applicants may count:

- (1) Salaries paid to staff of the recipient to provide supportive services to CoC participants;
- (2) The value of supportive services provided by other persons or organizations to CoC participants;

All match must be for eligible activities.

FINANCIAL MANAGEMENT

Rental assistance amounts and payments.

Rental payments may be used in the following situations:

Vacancies – If a participant vacates the unit before the expiration of the occupancy agreement, assistance may continue for a maximum of 30 days from the end of the month in which the unit was vacated unless the unit is occupied by another eligible person. This does not include participants who are in brief periods of inpatient care, which is not to exceed 90 days for each occurrence.

Administrative costs – The City of Mount Vernon may use up to 7 percent of any grant awarded for Administrative Costs Eligible administrative costs include:

Eligible administrative activities include processing rental payments to landlords, examining participant income and family composition, providing housing information and assistance, inspecting units for compliance with housing quality standards, and receiving into the program new participants.

ROLES AND RESPONSIBILITIES

As grantee for the CoC funds, the City of Mount Vernon is responsible for financial management. This responsibility is divided between two groups: the CoC Program staff (URA Executive Director, Housing Inspector, CoC Consultant and the Accounting Department (Bookkeeper, Accounting Manager, and Accounting Clerk). The roles of each group in relation to financial management are:

CoC Program Staff: Collect and verify information on applicant's income, document contract rent for applicant's housing unite, and HQS inspections. Calculate and document participant's rental portion and CoC subsidy amount.

Accounting Department: Review CoC subsidy calculations performed by CoC program staff. Issue rental assistance checks to landlords. Track and document grant administration expenses. Draw down CoC funds from HUD. Produce monthly financial reports documenting actual versus budgeted income and expenses.

Rental Assistance Payments

The URA Finance Staff is responsible for issuing rental assistance payments to landlords (including payments for security deposits)

Administrative Costs

The URA finance staff will record in the general ledger all eligible actual administrative expenses for the CoC Program based on information from staff time sheets.

In accordance with HUD regulations, the following activities are eligible as administrative costs: Receiving new participants into the program; Providing housing information and search assistance; Determining participant income and rent contributions; Inspecting units for compliance with Housing Quality Standards and Processing rental payments to landlords.

The URA finance staff will track administrative costs to ensure that they do not exceed 10% of the total grant.

HUD Draws

On a monthly basis the URA finance staff will use HUD's eLOCCS system to draw down CoC funds to reimburse the City of Mount Vernon for its eligible expenditures. The following procedure will be followed:

The URA finance staff will generate a General Ledger report documenting all expenditures for the period, including both administrative costs and rent payments.

The URA finance staff will check the General Ledger report against the CoC Rental Assistance Report and Participant Log to ensure it is accurate.

The URA finance staff will complete a LOCCS voucher, attaching a copy of the General Ledger Report, CoC Rental Assistance Report, Participant Log and Rental Assistance Worksheets.

The URA finance staff and URA Executive Director will review and sign the voucher (HUD regulations require two signatures).

The URA finance staff will call in the voucher using HUD's electronic LOCCS system.

Financial Reports

On a monthly basis the URA finance staff will run a CoC Financial Report using the general ledger module of the accounting system. This report will document actual income and expenses for the current month, prior months, and "year to date" totals for the term of the grant. This report will also show the total number of units under lease at the end of each month of the grant term. The URA finance staff will distribute this report to the URA Executive Director and Deputy Director and to the subrecipients as applicable.

GRANT ADMINISTRATION

Tracking Grant Income and Expenditures

The URA finance staff will provide the URA Executive Director a monthly CoC Financial Report showing a month-by-month breakdown of expenses and number of units assisted in each month. The purpose of this report is to provide a tool that the Executive Director can use to monitor grant expenditures and make the adjustments necessary to ensure that the maximum number of clients are served without going over budget.

Analyzing and Responding to Grant Utilization Data

The URA Executive Director is responsible for monitoring grant utilization and making needed program adjustments. On a monthly basis, the URA Executive Director reviews the CoC Financial Report prepared by the URA finance staff, assesses the lease-up rate, and projects whether the grant will be overspent or underspent at the end of the grant term. If there is a possibility of under spending, the URA Executive Director will inform the service provider agencies that referrals are being accepted for new clients. If the summary report indicates that there is a possibility of overspending the grant, the URA Executive Director will recommend that no new clients are admitted into the program until the spending rate is reduced to the desired level.

Grant Extensions and Renewals

The URA Executive Director will work closely with the Westchester Continuum of Care to submit an annual request for renewal of the CoC grant as part of the Westchester Continuum of Care process by completing the required applications and processes. Since CoC grants with one year renewal terms may not be extended, the City of Mount Vernon will make its best effort to expend all grant funds before the end of the 12-month grant term. As per HUD requirements, the deadline for drawing down grant funds is 90 days from the end of the grant term (for expenses incurred during the grant term). Unexpended funds will be returned to HUD.

Grant Amendments

Any significant grant changes require written HUD approval. The City of Mount Vernon will submit a written request to HUD and obtain a written grant amendment for any major changes, such as changing the target population for the grant. As per HUD regulations, the City of Mount Vernon is not permitted to change units from one CoC program component to another (e.g. changing TRA units to SRA units).

Obligation and De-Obligation of Funds

When HUD and the applicant execute a grant agreement, HUD will obligate the funds to cover the approved grant. The recipient is expected to carry out the proposed activities in the application. However, if the recipient does not carry out the proposed activities or if the grant amount is not used in a timely manner, HUD may de-obligate all or a portion of the funds.