

County of Marin
Health and Human Services
Homelessness and Coordinated Care

Continuum of Care Program Policies and Procedures

Amended: September 2024

Contents

- Continuum of Care (CoC) Overview 4
 - Introduction..... 4
 - Frequently Used Terms..... 5
 - Organizational Structure and Key Functions 7
 - Introduction..... 7
- County Structure and Roles 8
 - Marin County Board of Supervisors 8
 - Office of the County Executive 8
 - Homeless Policy Steering Committee 8
 - Marin County Department of Health and Human Services 9
 - County Counsel..... 9
- Continuum of Care Grants 9
- CoC Collaborative Applicant..... 10
 - Preparation For Continuum of Care Meetings..... 10
- Continuum of Care Competition..... 11
- General Requirements and Restrictions for CoC Program Recipients, Subrecipients, and Contractors..... 12
- Required Program Reports and Forms..... 20
- Match Requirements 20
 - Match Letters 21
- Record-Keeping 22
 - General CoC Recordkeeping Requirements 22
 - Program Participant/Client Files..... 23
 - Environmental Review..... 24
 - Annual Performance Report (APR)..... 24
- Selection, Subrecipient and Contracting Process..... 24
 - Use of Grant Funds for Procurement of Goods and Services* 26
 - Compliance with Grant Source Procurement Requirements* 26
- Executing Contracts**..... 27
 - Technical Assistance..... 28
- Project Compliance 28
 - CoC Recipient, Subrecipient, and Contractor Compliance 28
 - Monitoring 28

Fiscal Monitoring and Reporting, Compliance.....	28
Remedial Actions and Sanctions	31
Grant Close-Out Procedures	32
FSRS	33
Hatch Act	33
Enforcement and Compliance:.....	33
Implications for Marin County:	33
Conflict of Interest	34
Financial Management.....	34
eLOCCS Access.....	34
Draw Down Process.....	35
HUD Grant Agreements	35
COC & Planning Grants Drawdown process.....	36
AUDITS/RECORDS:	37
Appendix A.....	39

Continuum of Care (CoC) Overview

Introduction

The purpose of the County of Marin Health and Human Services, Homelessness and Coordinated Care CoC Program Policies and Procedures desk guide is to provide general guidance on relevant policies and procedures for Marin County Health and Human Services staff, grantees and subrecipients funded under Continuum of Care (CoC) Grants, as administered by the U.S. Department of Housing and Urban Development (HUD). The CoC programs are governed under the [McKinney Vento Homeless Assistance and Rapid Transition to Housing Act of 2009 \(HEARTH Act\)](#).

The purpose of the Policies and Procedures guide is to provide administrative and programmatic guidance for the County of Marin and its Subrecipients and Contractors to operate programs awarded under the Continuum of Care Program. The Guide is intended to support those receiving CoC Program funds in understanding and complying with federally imposed requirements as well as locally established policies implemented by the County to meet those requirements.

Please note that a program's grant agreement with HUD or the Marin County Health and Human Services (HHS), Homelessness and Coordinated Care Division (HCC) may indicate different requirements or rules that must be adhered to for the specific program covered in the agreement. If there are any questions or concerns, direct recipients should contact the local HUD field office and subrecipients should contact their Program or Contract Manager at HHS, HCC Division.

The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. The CoC Program funds the following project component types: Permanent Supportive Housing, Rapid Rehousing, Transitional Housing, Joint Transitional Housing: Rapid Rehousing, Homeless Management Information System (HMIS) and Supportive Services for Coordinated Entry. Administrative activities are also eligible.

Under the CoC Program, the Marin County Homelessness and Coordinated Care division (HCC) acts as the administrative agency and is also the direct recipient for several projects funded through this program, and contracts with nonprofit agencies known as "subrecipients," to carry out the contracted activities. When HCC is not the direct recipient, a nonprofit agency receives a grant directly from HUD and operates as recipient of that grant, while following the policies and protocols as outlined by the grantor.

Frequently Used Terms

Collaborative applicant means the eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds under this part on behalf of the Continuum and to apply for the CoC Planning grant funds on behalf of the CoC during the CoC program Competition. The CoC may assign additional responsibilities to the Collaborative Applicant so long as these responsibilities are documented in the CoC's Governance Charter. The [Marin County CoC Governance Charter](#) has designated the County of Marin Health and Human Services Department as the CoC's Collaborative Applicant.

Continuum of Care (CoC) is the group organized to carry out the responsibilities required under the Continuum of Care and Emergency Solutions Grants Programs. CoCs are composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate. Its membership overlaps with the entities providing services and housing as part of the Homelessness Crisis Response System. The Marin County Continuum of Care (CA-507) covers the entire geographic area of Marin County, California.

Continuum of Care (CoC) Program is the Federal grant program for targeted homeless activities, including Rapid Rehousing and Permanent Supportive Housing. The program is administered federally by HUD, and locally by a nonprofit or governmental lead agency, which is then overseen by the CoC governing body or board. In the Marin County CoC, the Homeless Policy Steering Committee (HPSC) is the CoC governing body, and the County of Marin Health and Human Services Department acts as the lead agency.

Continuum of Care (CoC) Program [Interim Rule](#) focuses on regulatory implementation of the CoC Program. The CoC Program was created through the [McKinney-Vento Homeless Assistance Act As Amended by S.896 Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act of 2009](#).

Contractor A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See the definition of *contract* in [§ 200.1](#). Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

- (1) Provides the goods and services within normal business operations;
- (2) Provides similar goods or services to many different purchasers;

- (3) Normally operates in a competitive environment;
- (4) Provides goods or services that are ancillary to the operation of the Federal program; and
- (5) Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons. ([2 CFR 200.331\(b\)](#))

Coordinated Entry (CE) is a centralized or coordinated process designed to streamline participant intake, assessment, and provision of referrals. The purpose of a CE System is to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, and connected to housing and homeless services based on their strengths and needs. It uses standardized tools and practices, incorporates a system-wide Housing First (no barriers to entry) approach, and, in an environment of scarce resources, coordinates housing support so that those with the most acute service needs are prioritized. The Marin [Coordinated Entry System Policies and Procedures](#) guide the operation of the Marin Coordinated Entry System.

Marin County Health and Human Services (HHS): With 650+ employees, 40+ programs and services and 12+ locations, we are the largest department in the County of Marin, and it is our mission at HHS to promote and protect the health, wellbeing, self-sufficiency, and safety of all people in Marin.

Homelessness and Coordinated Care Division (HCC): the division serving under Health and Human Services providing Coordinated Care, entry and access to services, and administrative entity for serving the homelessness population of Marin County

Homelessness Management Information System (HMIS) is the overall system of services to address homelessness managed by HCC. The goal of this system is to prevent homelessness when possible and to make it rare, brief, and one-time event. The system helps people exit homelessness by getting a house key into their hands as quickly as possible. Core components of the Homelessness Response System include Coordinated Entry, Problem Solving, Street Outreach, Temporary Shelter, Housing, and Housing Ladder. The [Marin County Continuum of Care HMIS Governance Charter](#) formalizes the roles and responsibilities for all HMIS entities.

Homeless Policy Steering Committee The Homeless Policy Steering Committee (HPSC) develops long-term strategic plans and facilitates year-round efforts to identify the needs of homeless individuals and families in Marin. The Steering Committee also provides opportunities for leadership and coordination for Marin's county-wide response to homelessness.

HUD is the US Department of Housing and Urban Development, the federal department responsible for the administration and management of both Continuum of Care (CoC) and ESG programs.

NOFA refers to a Notice of Funding Availability (a call for grant applications) issued by HUD for CoC funds.

Participant is a person seeking or receiving services from the Homelessness Response System.

Recipient is an applicant, non-profit, local County Government, or municipal agency that enters into a direct grant agreement with HUD. In the past, the term “grantee” was often used to describe a recipient.

Recertification means the annual review of eligibility for services required by HUD regulations in order to continue to provide assistance.

Subrecipient means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- (1) Determines who is eligible to receive what Federal assistance;
- (2) Has its performance measured in relation to whether objectives of a Federal program were met;
- (3) Has responsibility for programmatic decision-making;
- (4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- (5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity. ([2 CFR 200.331\(a\)](#))

Organizational Structure and Key Functions

Introduction

The Continuum of Care Interim Rule calls on local communities, including potential CoC grant recipients, to establish a **Continuum of Care** for the geographic area. Continuums of Care are networks of relevant organizations including nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities,

affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals in the geographic region.

The Continuum of Care (CoC) Program provides funding for the following program types: Permanent Supportive Housing, Rapid Rehousing, Transitional Housing, Supportive Services Only (including Coordinated Entry), HMIS, and Planning. As set forth in the HEARTH Act, there are four categories of participant eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to approval by HUD), and (4) Fleeing/Attempting to Flee Domestic Violence. The Marin County Continuum of Care elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand. Please see the [Marin County Continuum of Care Written Standards](#) of Service for additional information.

County Structure and Roles

Marin County Board of Supervisors

- Approves all HUD Grant Awards, Agreements and Amendments
- Approves all contracts over \$50,000 for grant funds to subrecipients and other project sponsors.
- Approves any documents (such as subordination agreements) that require notarization and affect the County's interests in real property.

Office of the County Executive

- Signs environmental reviews that require signature of a Certifying Officer.
- Sign's certifications of consistency with the Consolidated Plan.
- Approves all contracts of \$50,000 or less for grant funds to subrecipients and other project sponsors.

Homeless Policy Steering Committee

The Homeless Policy Steering Committee (HPSC) develops long-term strategic plans and facilitates year-round efforts to identify the needs of homeless individuals and families in Marin. The Steering Committee also provides opportunities for leadership and coordination for Marin's county-wide response to homelessness. Involving key local stakeholders in establishing a community-wide response to the complex problem of homelessness.

- Analyzes relevant data to identify the most effective mix of homeless services and housing for Marin.
- Sets priorities for programs and designing evaluation processes.
- Provides final approval for the Marin Continuum of Care application submission to the Department of Housing and Urban Development.
- Oversees implementation of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) at a local level.
- Provides oversight of the CoC's Homeless Management Information System (HMIS)
- Monitoring implementation of the CoC's 10 Year Plan

Marin County Department of Health and Human Services

- As the CoC Collaborative Applicant, manages annual CoC NOFO funding competition and Emergency Solutions Grants (ESG) Balance of State funding competition.
- Conducts application process and is the grantee for CoC grants:
 - Coordinated Entry and
 - Planning Grant
- Solicits, prepares contracts with subrecipients and other program implementation CoC Recipient, Subrecipient, and Contractors.
- Processes check requests in accordance with roles assigned by Department of Finance and procedures established by Department of Finance.
- Requests, at a minimum, bi-annual programmatic and demographic reports from subrecipients outlined in the reporting section of this document. (also see Appendix A)

County Counsel

- Provides legal support for the County of Marin including HHS. County Counsel staff assists with legal contract review when standard forms are not used, and review of other documents which are to be signed by the Board of Supervisors.
- Reviews and approves the HHS standard contract template and any additions or edits to the template. County Counsel reviews documentation where legal review and advice is needed.
- County Counsel renders legal advice and affords legal representation and serves as legal counsel in civil matters for all County departments, as well as many special districts. County Counsel attorneys do not provide legal advice to the public. (source: <https://www.marincounty.org/depts/cl>)
- [County Counsel Hub Site](#)

Continuum of Care Grants

The Continuum of Care (CoC) Program is a funding source authorized by Congress under the HEARTH Act and managed by the Department of Housing and Urban Development (HUD). CoC Program funds are designed to:

- Promote community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts by nonprofit providers, states, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

Under the CoC Program, HUD awards funds to nonprofit organizations, states, units of local governments, and/or instrumentalities of state or local government, collectively known as *recipients*. Recipients may directly carry out the activities in the funded application, or they may contract with other organizations or government entities, known as *subrecipients*, to carry out day-to-day project operations.

As part of the CoC Program, each community must establish an oversight body, also known as a **CoC Board**. The CoC has a range of planning responsibilities as set forth in the CoC Interim Rule. The CoC must designate a lead agency to serve as the community's **Collaborative Applicant** for CoC funds. The Collaborative Applicant must submit a single collaborative application to HUD that includes all the funding requests from applicants to support their projects. CoC funds can be used for a variety of projects providing housing and services to homeless people.

Marin County HHS is the recipient of two CoC grants: A renewable Coordinated Entry grant, part of which is subcontracted to Marin Housing Authority, and a one-time Planning Grant which is offered annually at HUD's discretion.

CoC Collaborative Applicant

The Marin County CoC has designated the County of Marin as the Collaborative Applicant for the CoC in the [Marin County CoC Homeless Policy Steering Committee Governance Charter and Bylaws](#).

As the Collaborative Applicant, Marin Health and Human Services has the responsibility for ensuring the County of Marin applies for a grant from HUD on behalf of the Continuum of Care. In its capacity as the CoC Collaborative Applicant, Marin County HHS is the grant recipient of the CoC Planning Grant on behalf of the CoC. Other responsibilities assigned to the Collaborative Applicant are outlined in the [CoC's Governance Charter](#). Marin County applies for the CoC Planning grant funds on behalf of the CoC during the CoC program Competition. The CoC may assign additional responsibilities to the Collaborative Applicant so long as these responsibilities are documented in the CoC's Governance Charter. The [Marin County CoC Governance Charter](#) has designated the County of Marin Health and Human Services Department as the CoC's Collaborative Applicant.

Preparation For Continuum of Care Meetings

As the Collaborative Applicant, HHS convenes the Housing Policy Steering Committee (HPSC), and invites all CoC program recipients, subrecipients, and other community partners to quarterly meetings to share ideas and conduct the business of the CoC. HPSC meetings are used to discuss policy changes, compliance issues, and best practices, as well as to stay up to date and to learn from Community Based and governmental agencies who are participants in the meetings.

At least one week before the meeting:

- Contact HPSC about attendance to insure a quorum

At least 3 business days before the meeting:

- Post agenda to CoC website
- Post agenda to the physical location of the meeting

- Send announcement to HPSC listserv with agenda and all available materials, including PDF of any PowerPoint presentations

Follow-up Actions for Continuum of Care Meetings

- Post approved minutes on the CoC website
- Follow-up with approved (voted on recommendations/ action items from the CoC meeting

Continuum of Care Competition

The U.S. Department of Housing and Urban Development (HUD) releases a ***Notice of Funding Availability (NOFA) annually***, signifying the beginning of a funding competition between hundreds of CoCs across the country. The information in the NOFA sets forth the competition rules and processes for that competition year and announces policy priorities for the Program. The annual CoC NOFO competition is the process through which HUD awards CoC Program grants to recipients.

Traditionally, the CoC Consolidated Application (including the Planning Grant), which HHS submits annually to HUD on behalf of the Marin County Continuum of Care, consists of three parts:

- The CoC Application, which describes the CoC planning body, governance structure, overall performance, and the strategic planning process;
- The CoC Project Listing, which ranks the project applications for HUD and identifies any rejected applications, showing the CoC's priorities for funding; and
- Project Applications, each of which reflects individual projects seeking funding.

The stages of the annual Continuum of Care Notice of Funding Opportunity (CoC NOFO) are:

- Registration
- Grant Inventory Worksheet (GIW)
- NOFO
 - Community Application
 - Review and Rank

Homebase is a Contractor for the Planning Grant and manages the CoC's application for CoC Program funds. County staff roles are:

- Submit registration (Homebase will email when available)
- Approve GIW (Homebase will review for accuracy)
- Create project applications for Coordinated Entry and Planning Grant funds
- Provide information for Community Application
- Oversee process.

Before the application is submitted to HUD, the Marin County Continuum of Care holds a local competition to determine which project applications will be included in the Consolidated Application, along with their relative priority. The results of the local competition dictate how CoC projects will be prioritize.

As the Collaborative Applicant, HHS conducts the annual local CoC Program competition. Project applicants must participate in the local review and rank process and have their project selected for submission with the CoC Consolidated Application in the national competition, in order to be eligible for potential upcoming funding. All project applicants must follow local CoC procedures and submit required documents, and meet timelines as outlined by the Marin CoC process. HUD requires the use of a web-based application and grants management system called *e-snaps*; all project applicants are required to register in *e-snaps* and comply with HUD deadlines.

General Requirements and Restrictions for CoC Program Recipients, Subrecipients, and Contractors

Required Activities Include:

- All programs will have a written grievance policy, inform participants of their right to grieve, and respond to grievances and complaints in a timely, fair, and transparent manner.
- Programs will enter client-level data into HMIS for the purposes of tracking program and system performance and comply with all applicable Data Standards and data quality requirements for all clients.
- CoC Recipient, Subrecipient, and Contractor will adhere to Housing First principles to the extent applicable, described below.
- CoC Recipient, Subrecipient, and Contractor will participate in the annual Point-in-Time Sheltered Count and/or the Housing Inventory Count as applicable.
- CoC Recipient, Subrecipient, and Contractor will participate in the County's Coordinated Entry system.

Written Standards

All CoC Program Recipients and Subrecipients are required to follow the [Marin County Continuum of Care Written Standards of Service](#). Agency-level program policies and procedures should reflect the standards described in that document.

Protecting the Educational Rights of School-Aged Children

In order to protect the rights of school-aged children experiencing homelessness, all programs must:

- Maintain and adhere to policies that are consistent with and do not restrict the exercise of rights provided by subtitle B of title VII of the McKinney Vento Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness.
- As applicable, designate a staff person responsible for ensuring that any children served by the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the

McKinney Vento Act. Staff person may meet this requirement through monitoring of external case managers.

- Take the educational needs of children into account when families are placed into housing and, to the maximum extent possible, place families with children as close as possible to their school of origin so as not to disrupt such children's education.

Supporting the Participation of Homeless Individuals in Program Planning and Operation

All agencies must provide for the participation of at least one homeless or formerly homeless individual on the board of directors or equivalent policymaking entity. The participation of a homeless or formerly homeless individual on the Homeless Policy Steering Committee, the policymaking entity for the CoC and Coordinated Entry system, shall meet this requirement for the Coordinated Entry and Planning Grants. If an agency is unable to meet this requirement, the County must be notified and alternative arrangements to consult with a homeless or formerly homeless person must be approved by HUD. To the greatest extent possible, all programs should involve homeless individuals and families through employment, volunteer services, or in other roles supporting the program.

Program Fees

The Coordinated Entry program may not charge program fees to participants.

Fair Housing and Non-Discrimination

Programs must adhere to policies that Affirmatively Further Fair Housing and ensure Non-Discrimination in all program operations. Consistent with the policies of the Marin Continuum of Care, programs shall not tolerate discrimination on the basis of any protected class (including actual or perceived race, color, religion, national origin, sex, age, familial status, disability, sexual orientation, gender identity, or marital status) during any phase of the Coordinated Entry process. Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. For example, a HOPWA -funded project might be required to serve only participants who have HIV/AIDS. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

All aspects of the Marin Coordinated Entry process, including Housing Locator services, will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any particular housing facility or neighborhood because of race, color national origin, religion, sex, disability, or the presence of children.

All locations where persons are likely to access or attempt to access the Coordinated Entry System will include signs or brochures displayed in prominent locations informing participants of their right to file a non-discrimination complaint and containing the contact information needed to file a non-discrimination complaint. The requirements associated with filing a nondiscrimination complaint, if any, will be included on the signs or brochures. The Coordinated Entry Non-Discrimination Complaint Form can be found as Appendix D to the [Marin Coordinated Entry System Policies and Procedures](#).

When a non-discrimination complaint is received, the Coordinated Entry Provider, in coordination with an ad hoc committee of the Homeless Policy Steering Committee, will complete an investigation of the complaint within 60 days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge, and by attempting to collect any documents that are likely to be relevant to the investigation. Within 30 days after completing the investigation, the Coordinated Entry Provider will write an adequate report of the investigation's findings, including the investigator's opinion about whether inappropriate discrimination occurred, and the action(s) recommended by the investigator to prevent discrimination from occurring in the future. If appropriate, the investigator may recommend that the complainant be re-assessed or re-prioritized for housing or services. The report will be kept on file for two years.

This program shall be committed to adopting a Housing First approach and reducing barriers for accessing their services. Individuals are not screened out of the assessment process due to perceived or actual barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record.

In addition, this program shall affirmatively market services to eligible persons who are least likely to apply in the absence of special outreach. The marketing may be conducted using methods such as brochures, flyers, community announcements, and websites. Marketing will be designed to ensure the coordinated entry process is available to all eligible persons regardless of membership in any protected classes under federal and state law. Similarly, marketing and outreach efforts will be designed to ensure people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process.

Cultural Competency

Programs must comply with the County's Cultural Competency Plan. Recipients and subrecipients shall be responsible for providing services that incorporate the cultural background of the client, including the language, family structure, religion, and belief system of the client.

- a. Recipients and subrecipients shall ensure that the quality of care provided to non-English-speaking individuals or to individuals with Limited English Proficiency (LEP), meets the same standards and is not substandard to the care provided to English-speaking clients.
- b. Recipients and subrecipients shall take all steps necessary to develop and maintain an appropriate capability for communicating including providing sufficient qualified translators or translation service, in any necessary second language, including American Sign Language.
- c. Recipients and subrecipients shall be responsible for providing services to non-English/LEP speaking individuals in their own language. CoC Recipient, Subrecipient, and Contractors will have staff that are linguistically proficient in the threshold language(s) at key points of contact and during regular operating hours.

- d. All necessary steps will be taken to provide services in any language which is the primary language of at least 5 percent (5%) of either the community potentially served by the CoC Recipient, Subrecipient, and Contractor or CoC Recipient, Subrecipient, and Contractor's client population. Spanish is currently the only threshold language for Marin.

Administrative Responsibilities

- a. Recipients, Subrecipients, and Contractors will ensure funding is utilized according to funding requirements.
- b. Recipients, Subrecipients, and Contractors will enroll Moving On participants in HMIS and exit after year of monitoring.
- c. Subrecipients, and Contractors will submit reports as outlined below (reporting section) and meet with HHS staff to review outcomes, data and evaluate progress in meeting contract requirements, at a minimum interval of 6 and 12 months from contract execution.
- d. Subrecipients, and Contractors agree to work with HHS to develop Moving On program eligibility and selection criteria
- e. PDSA/Continuous Quality Improvement: Recipients, Subrecipients, and Contractors shall participate in ad-hoc meetings with the Homelessness and Coordinated Care Business Unit and its representatives for continuous quality improvement reviews as well as quarterly PDSA documentation meetings.
- f. Training and Technical Assistance: Subrecipients and Contractors agree to accept technical assistance and training as required by HHS. Anticipated technical assistance and training include:
 - 1. Compliance training regarding Homelessness and Coordinated Care, release of information, data systems, and information sharing generally
 - 2. Technical assistance regarding implementation of underlying philosophies as outlined above
 - 3. Technical review and adjustment of existing HHS contracts to align with the Homelessness and Coordinated Care division's goals and philosophies
- g. Recipients, Subrecipients and Contractors shall ensure that all digital content and deliverables comply with World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG), 2.1, level AA or most recent version. Vendor is responsible for addressing accessibility problems in any implementation, configuration, or documentation delivered or performed by Vendor, and, in any software, documents, videos, and/or trainings given and published by Vendor and delivered under this contract. Applicable laws include but are not limited to Americans with Disabilities Act, 21st Century Communications and Video Accessibility Act (CVAA) and California Government Code Sections 7405 and 11135.

Conflicts of Interest

As defined by HUD in 24 CFR 5/8.95(c) an organizational conflict of interest would arise if, because of activities or relationships with other people or organizations, a Recipient, Subrecipient,

or Contractor agency was unable or potentially unable to provide impartial assistance through this program, or an employee's or board member's objectivity were impaired.

To avoid conflicts of interest, no Recipient, Subrecipient, or Contractor employee, agent, consultant, officer, or elected/appointed official that is in a position to participate in a decision-making process or gain inside information may obtain a financial stake or benefit from an assisted activity during his/her tenure or in the one-year term following his/her tenure. Recipients, Subrecipients, and Contractors must also maintain and adhere to policies that avoid or, when acceptable, mitigate any potential conflicts of interest or appearances of conflicts of interest as set forth in 24 CFR 578.95.

Recipients, Subrecipients, and Contractors must comply with all conflict-of-interest requirements under 24 CFR 85.36 (for government entities) when procuring goods or services.

County of Marin

Accessibility Requirements for Delegated Direct Services The Americans with Disabilities Act of 1990 requires that all of the County of Marin's programs, services, and activities be accessible to and usable by individuals with disabilities. This law also stipulates that we may not delegate away our responsibility to ensure people with disabilities have equitable access. This means that not only must the programs and services administered by the County be accessible, but also those administered on behalf of the County by third party agencies. All entities receiving County funding which provide direct services to the public must also comply with the accessibility requirements set forth in the ADA, and other applicable laws and regulations. This guide has been created to assist agencies under contract with the County of Marin to ensure that they comply with accessibility requirements. Inquiries related to the content herein can be directed to:

County of Marin
Disability Access Program
(415) 473-4381 (voice)
(415) 473-3232 TTY
disabilityaccess@marincounty.org

Programs and Services

Every aspect of the service you provide is considered part of your program, and therefore it must be accessible to individuals with disabilities. This includes parking lots, service counters and spaces, transportation (shuttles, etc.), agendas, flyers, emails, online services, phone calls, meetings, celebrations, classes, recreational activities and more. The guidance in this document is primarily intended to help you provide accessible programs by providing you with the tools to:

- survey facilities and identify common architectural barriers for people with disabilities;
- identify common ADA compliance problems in your communications and activities; and
- remove barriers and fix common ADA compliance problems in these areas.

[ADA Technical Assistance Materials](#)
[ADA Update](#)

Your programs can be broken into three main categories, (Communications, Facilities, and Activities) which will be covered in more detail below.

Communications

All the communications within your program must be accessible. This means any documents you provide must be made available in alternative formats, upon request. Brochures, agendas, schedules, and lists all may be requested by a client to be provided in alternative formats. Alternative formats can include Braille, large font, or documents on a thumb drive. You do not need to have all formats on hand at all times, but you must have a plan in place to provide them in a reasonable amount of time. Some clients may require professional support from providers such as sign language interpreters. Requests for these accommodations must be addressed in a timely manner as well.

The following is a list of resources and tools you may find helpful when ensuring the accessibility of your communications:

[ADA Requirements: Effective Communications](#)

[General Effective Communication Requirements under Title II of the ADA](#)

[US Access Board Guidelines and Standards: Communications](#)

Facilities

If you are bringing clients into your facilities, or providing facilities for their use (recreation, program participation, housing, etc.) these facilities must meet accessibility requirements. In California, the best source of information on accessibility requirements for facilities is the California Building Code (CBC). The accessibility requirements contained in the CBC are compatible with the Federal requirements adopted by the United States Access Board. What is most important to remember about facilities is that your clients with disabilities need to be able to arrive, enter, conduct business, and interact with your program in the same way that clients without disabilities can. This generally means you must provide accessible parking, path of travel, meeting and workspaces, restrooms, and communal areas. All areas of your facility where clients will visit must be accessible. Please note there are different requirements for different types of facilities, so please review the requirements carefully.

The best way to determine if your facility is accessible and to determine what remediation may be necessary to bring your facility into compliance is to conduct a survey. You can either do this yourself, with the help of the tools provided below, or you can hire a Certified Access Specialist (CASp) to perform a survey for you and compile the findings. A list of CASp certified individuals can be found on the California Department of General Services Website. This list includes both public and private specialist, many of whom are available to work with publically contracted service providers.

The following is a list of resources and tools you may find helpful when trying to assess the accessibility of your facilities:

[US Access Board ADA Requirements](#)

[US Access Board Guidelines and Standards: Buildings and Sites California Building Code, Chapter 11B – Accessibility](#)
[ADA Checklist for Existing Facilities](#)
[Overview of Title II ADA Requirements for Buildings and Facilities](#)

Activities

Meetings, company outings, fundraising events, counseling sessions, classes and trainings are all examples of some activities your organization may provide. Any interaction between your agency and the client must be accessible to clients and/or employees with disabilities. Many accessibility issues surrounding activities will be remediated through ensuring your facilities and communications are accessible; however there are other areas you must consider. For example, course content may need to be modified for a client with a developmental disability, accessible transportation may need to be provided to an event site with no public transit access, etc.

The following is a list of resources and tools you may find helpful when trying to assess the accessibility of your activities:

[A Planning Guide for Making Temporary Events Accessible to People with Disabilities Accessible Events: Planning and Preparation are Key](#)
[Website Accessibility under Title II of the ADA](#)

[ADA Guidelines for Recreational Facilities](#)

[US Access Board Guidelines and Standards: Recreation Facilities, Streets and Sidewalks, Transportation, Health Care](#)

Confidentiality Requirements

HMIS

In addition to meeting all confidentiality and security requirements associated the use of the Homeless Management Information System (HMIS), Recipients, Subrecipients, and Contractors must also maintain and adhere to written confidentiality protocols that ensure that:

- All records containing protected identifying information of any individual or family who applies for and/or receives assistance will be kept secure and confidential;
 - All records pertaining to any individual or family that was provided family violence prevention or treatment services through the project will be kept secure and confidential;
 - The address or location of any family violence project will not be made public, except with written authorization of the person responsible for the operation of the project, and
 - The address or location of any housing of a program participant will not be made public except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality.
1. Confidentiality. CoC Staff, Subrecipient, Contractor and any employees and/or volunteers performing services at its direction shall maintain the confidentiality of any

confidential or proprietary information and records made available or that Contractor is given access to in accordance with all applicable State and Federal laws relating to confidentiality. For purposes of this Contract, Confidential Information includes but is not limited to:

- a. Health Information: Includes medical information, which means any individually identifiable information regarding an individual's medical history, mental or physical condition, or medical treatment or diagnosis by a health care professional.

Personal Information. Information that identifies or describes an individual, including, but not limited to, their name, social security number, physical description, home address, home telephone number, education, financial matters, and medical or employment history.

2. Nondisclosure. Contractor and its employees, agents, or subcontractors shall protect Confidential Information from inappropriate and unauthorized access, use, or disclosure. To the extent Contractor accesses Confidential Information in the course of performance of this Contract, Contractor shall not use Confidential Information for any purpose and shall not disclose, any Confidential Information except if disclosure is required or permitted under State or Federal law.

3. Safeguards. Contractor shall implement appropriate and reasonable administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of Confidential Information that it may access, including training all employees who perform work on this Contract on Confidential Information and the need to protect Confidential Information. Contractors that participate in AB210 Multi-Disciplinary Teams shall also sign, return (to HSHHome@marincounty.org), and implement the Participating Agency Agreement and Confidentiality Statement for itself and its employees within thirty days after execution of this contract. Contractor and its employees will comply with the pertinent data sharing policies and procedures.

4. Additional State Requirements. In addition to meeting all confidentiality and security requirements associated the use of the Homeless Management Information System (HMIS), Contractor must also maintain and adhere to written confidentiality protocols that ensure that:

- All records containing protected identifying information of any individual or family who applies for and/or receives assistance will be kept secure and confidential;
- All records pertaining to any individual or family that was provided family violence prevention or treatment services through the project will be kept secure and confidential;
- The address or location of any family violence project will not be made public, except with written authorization of the person responsible for the operation of the project; and

- The address or location of any housing of a program participant will not be made public except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

Required Program Reports and Forms

Reporting

In addition to the Uniform Administrative Requirements set forth in 24 CFR parts 84 and 85, Subrecipients are responsible for collecting and reporting upon data on the use of program funds. This includes, but is not limited to, providing the program and financial data (including match information) necessary for the timely and accurate submission of an Annual Performance Report to HUD. HHS, as recipient, is responsible for submission of the Annual Performance Report.

Subrecipients must submit an invoice to HHS monthly, to allow HHS to make at least quarterly draws from HUD, which itemizes all program expenditures by budget line and funding source, including match, and provides ample supporting documentation for all expenditures. See financial management for finance reports required for subrecipients, and contractors.

Biannual Reporting Requirement

Subrecipients are required to submit reports on March 31st and October 31st addressing the following topics related to this contract's specific services, Equity Work, Client Input, Marin Homelessness System Navigation, Trauma, and Grievances. (See appendix A for Report Form included in Subrecipient Agreement)

Match Requirements

HUD requires that the CoC funding is matched with no less than a 25 percent cash or in-kind contribution, minus any leasing funds. The match requirements apply to rental assistance, supportive services, HMIS, administrative costs, and operations. Actual match is calculated by taking the total amount of the HUD award spent, minus any leasing, and multiplying by 0.25.

Match for the CoC Program must be well documented and used on CoC participants. Match requirements must be met on a grant-by-grant and annual basis. All costs paid for with matching funds must be for activities that are eligible under the CoC program, even if the recipient is not receiving CoC program grant funds for that activity.

The 25% match that needs to be documented is the amount of eligible and allowable CoC funds that were spent and drawn down by the CoC project during the grant year. Proposed match in a CoC application remains the proposed amount, rather than the actual amount that is documented with each draw down.

Cash Match refers to funds that are received by the program from another source and used to provide eligible activities in the project. A program may use funds from any source, include any

other federal sources (excluding Continuum of Care funds), as well as state, local, and private sources, provided that the funds from the sources are not prohibited by law to be used as a match. Match may not be double counted, i.e., used as a match for any other federally assisted program. Any program income generated from grant supported activities (e.g., rent or occupancy charges collected by the program) may be considered as match.

In-kind Match is the value of any real property, equipment, goods, or services contributed to a CoC Program grant that would have been an eligible CoC Program activity if the recipient or subrecipient paid for them directly with CoC Program funds. In-kind match can be donations provided directly by the recipient, subrecipient, or third party.

Documenting Match and Recordkeeping

Match Letters

Twenty-five (25%) percent match is required for all CoC Program grants.

Cash Match: Documentation of grant cash match is provided with a Match letter, on agency letterhead, outlining the following:

- Amount of cash to be provided to the recipient for the project;
- Specific date the cash will be made available;
- The actual grant and fiscal year to which the cash match will be contributed;
- Time period during which funding will be available; and
- Allowable activities to be funded by the cash match.

In-Kind Property, Equipment or Goods Match: Documentation of in-kind property, equipment, or goods match must be substantiated in a commitment letter on agency letterhead, signed and dated by an authorized representative, that includes the following:

- description and value of donation;
- date it will be available to the project;
- grant and fiscal year to which it's being contributed; and
- method used to value the donation.

Match must be tracked by the recipient or subrecipient to demonstrate that these items were delivered to the project and, if applicable, to its participants, during the grant term.

In-Kind Services Match: Documentation of in-kind services match must be substantiated by a Memorandum of Understanding (MOU) in place by the time of grant execution. The MOU must include:

- unconditional commitment to provide the services;
- detail of the services;
- profession of person to provide the services;
- hourly cost;
- grant and fiscal year it's being contributed; and
- details of the system/calculation method to document the quantity and value of services provided during the grant term.

During the grant term the recipient or subrecipient must document quantity and value of services and actual date(s) on which provided.

Programs must keep records of the source and use of contributions made to satisfy the match requirement (e.g., in a general ledger). Documentation of match is outlined in HHS subrecipient agreements and contractual documents for any CoC Recipient, Subrecipient, and Contractors or subrecipients receiving CoC funds.

Record-Keeping

Marin County will maintain subrecipient files from application submission through finalization; to include award and denial letters, including reports submitted by and communication with subrecipients; financial records, including allocations, invoices and reimbursements, program income and receipts, drawdown vouchers, reports submitted to, notifications of public review periods and comments, and communications with HUD in accordance with 24 CFR 578.103.

[Record Retention Policy](#)

General CoC Recordkeeping Requirements

County CoC Recipient, Subrecipient, must adhere to procedures that ensure the proper use of program funds, including maintaining sufficient records to demonstrate compliance with all program requirements. HUD recordkeeping requirements include:

- For all participants served who are homeless, acceptable evidence of homeless status as set forth in 24 CFR 576.500(b). Agencies receiving housing placements shall be responsible for maintaining records of homeless status.
- For all participants who are chronically homeless, acceptable evidence of chronically homeless status as set forth in HUD Notice-CPD-14-012, Agencies receiving housing placements shall be responsible for maintaining records of chronically homeless status.
- For all participants served who are "at risk of homelessness," acceptable evidence of "at risk of homelessness" status as set forth in 24 CFR 576.500(c). Agencies receiving housing placements shall be responsible for maintaining records of "at risk of homelessness" status.
- For any participant who receives housing assistance where rent is paid by the participant, proper verification of annual income, including income verification form, source documents, and other acceptable forms of third-party verification. Agencies receiving housing placements shall be responsible for maintaining records of participant income.
- For all participants served, records of all services and assistance provided to participants, including an annual assessment for participants who remain enrolled for more than one year, and documentation of case management and other services provided. These records must also demonstrate that participant services were reviewed at least annually and adjusted as needed to best serve participants. These records only must include records of services and assistance provided by the Coordinated Entry program.
- Evidence that HUD funds were expended only on HUD-eligible activities as set forth in 24 CFR 578 (CoC Program Interim Rule), 24.CFR 576 (ESG Interim Rule), and other applicable HUD guidance. HHS, as recipient, shall maintain these records.
- Detailed and comprehensive records of grant funding expended on the provision of services and evidence of adherence with generally accepted accounting principles for the purposes of program accounting and expenditures. HHS, as recipient, shall maintain these records.

- For all participants terminated from the program, evidence of compliance with exit protocols. This requirement only applies to clients fully terminated from the program and does not apply to client placed on the inactive list.
- Documentation of any match resources applied to the HUD Coe funding, including evidence that the resources used for match satisfy the match requirements set forth in 24 CFR 578.73. The County General Fund portion of this contract shall serve as match. HHS, as recipient, shall maintain these records.
- Evidence of a comprehensive conflict-of-interest policy and compliance with all organizational conflict-of-interest requirements set forth in 24 CFR 578.95, including documentation of any exceptions granted to the personal conflict-of-interest policy.
- Evidence of compliance with homeless participation requirements set forth in 24 CFR 578.75(9). HHS, as Collaborative Applicant for the Homeless Policy Steering Committee, shall maintain these records.
- Evidence of compliance with faith-based activities requirements set forth in 24 CFR b/8.8/(b).
- Evidence of compliance with Affirmatively Furthering Fair Housing requirements, as demonstrated by copies of all marketing, outreach, and other materials used to inform eligible participants of the program.
- Copies of all procurement contracts and documentation of compliance with all procurement requirements set forth in 24 CFR 85.36 and 24 CFR part 84.
- Evidence of compliance with all other Federal requirements set forth in 24 CFR 579.99.

All records pertaining to the operation of this program must be retained for at least 5 years after expenditure of program funds.

Program Participant/Client Files

Recipients, Subrecipients, and Contractors will maintain program participant files in compliance with HUD recordkeeping requirements and the CoC's Written Standards. Homelessness data and history will be captured in HMIS.

Client files should include, as applicable:

- Verification of eligibility, including homeless and disability status (if applicable) using HUD recommended documentation requirements for [homeless status](#), [disability](#), and [Chronic Homelessness status](#) (see links for HUD guidance/documentation requirements)
 - Recipients, Subrecipients, and Contractors should use the CoC's Third-Party Documentation Form Letter and Verification of Disability Form (Appendix C of the [Marin Coordinated Entry System Policies and Procedures](#)) when applicable
- Lease, sublease, or occupancy agreement(s)
- Income documentation and calculation of rent or occupancy charges (if applicable)
- Services provided to the participant
- Annual service assessment
- Reasonable belief of imminent threat of harm for households moved outside of CoC geography
- Proof of due process (if terminated)

Recipients, Subrecipients, and Contractors shall keep all records containing client information in a secure location and locked to maintain confidentiality.

Environmental Review

Prior to receiving a CoC grant, staff must compile an environmental review record and make determinations about the impact on the environment. CoC Planning and Coordinated Entry grants fall under the [Exempt Classification](#).

Annual Performance Report (APR)

Marin County must complete an Annual Performance Report (APR) for all CoC grants within 90-days of grant end. APRs must be submitted in [SAGE](#) the Homeless Management Information System ([HMIS](#)) database. Coordinated Entry APR must be run in HMIS and submitted.

Other Program Requirements

Recipients and subrecipients must document compliance with the federal requirements at 24 CFR part 578.99, as applicable, including Section 6002 of the Solid Waste Disposal Act, transparency in subcontracting, the Coastal Barrier Resources Act of 1982, applicable Office of Management and Budget (OMB) circulars, lead-based paint requirements, audit requirements, Davis-Bacon Act requirements, and requirements specified in Section 3 of the Housing and Urban Development Act.

Selection, Subrecipient and Contracting Process

Subrecipient, and Contractor are selected based on criteria outlined in the RFP and are notified and the County can begin the contracting process following relevant procurement guidelines from the County, State and Federal entities.

All solicitations for HHS CoC and Planning grant related subrecipient agreements, and contracts must undertake efforts to utilize small businesses, minority owned-firms, and women's business enterprises. ([2 CFR 700.11](#))

Contract means, for the purpose of Federal financial assistance, a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a federal award. For additional information on subrecipient and contractor determinations, see [§ 200.331](#). See also the definition of *subaward* in this section.

CoC Recipient, Subrecipient, and Contractor means an entity that receives a contract as defined in this section [https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1\(Contractor\)](https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1(Contractor)) 2 CFR 200.1 “Contractor”

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include

an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Source: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-A/subject-group-ECFR2a6a0087862fd2c/section-200.1>

RFP Process

The County must follow relevant procurement guidance from the County Purchasing Agent and/or relevant federal, state or local policies and procedures when releasing any Request for Proposals for any CoC grant funds.

The County Procurement Manual further defines Grant Funded Procurement or Goods and Services under Section 8.1, 8.2, 8.2.2

8.2.2. Federal Grants

All procurement related transaction shall be in accordance with 2CFR200. Purchasing transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective CoC Recipient, Subrecipient, and Contractor performance and eliminate unfair competitive advantage, CoC Recipient, Subrecipient, and Contractors that develop or draft specifications, requirements, statements of work, and invitations for bids or requests for proposals must be excluded from competing for such procurements.

Guidance for Request for Proposal (RFP) follow guidance given in the Marin County procurement Manual, Section 11.2.6:

11.2.6. Request for Proposal (RFP)

A document used to solicit general or professional services through a formal, competitive selection process. Fees or prices can be a factor in the evaluation process when using this procurement method for services other than construction-related professional services. For specific projects such as a clearly defined construction related project, a two-step procurement method can be used that consists of establishing a list of qualified firms and negotiating fees.

Applicable competitive procurement thresholds are outlined in the Marin County Procurement Manual under Section 11.3,

11.3. Procurement Dollar Thresholds

*The Purchasing Agent shall recommend to the Board of Supervisors, the dollar thresholds for competitive procurement. The following table summarizes the dollar thresholds and approval authority for the various contract types that are effective as of the date of this Policy Manual. *Approval Level 2 in the table below represents the quality control function of Centralized Procurement for transactions requiring Board of Supervisors approval and may include purchase order approval to encumber funds on all transactions over \$5,000.*

Requirements are outlined in the RFP documents and are publicly posted on the [HHS Requests for Proposals or Statement of Interest \(RFP\) site](#).

All Contracts and Agreements must adhere to relevant procurement standards, policies, procedures and guidelines. The County of Marin follows the guidance provided in the Department of Public

Works [Procurement Manual](#) which outlines the contracting process Countywide. HHS follows internal Contract Policy and Procedure manual (see appendix x) which provides internal departmental guidance for creating and executing contracts.

Section 8 of the Marin County Procurement Manual relevant policy:

SECTION 8 - GRANT FUNDED PURCHASES

Use of Grant Funds for Procurement of Goods and Services

The County of Marin is the recipient of various grant funds. Grant sources include private donations, and/or local, State, and federal funding streams. In some instances, the source of funds will dictate the procurement method. It is important to identify any special procurement requirements, including any County matching requirements or other commitments, with the County Administrator, before the grant application process, but not later than upon notification of grant award, consistent with Administrative Regulation No. 1.23.

Compliance with Grant Source Procurement Requirements

Procurement requirements are prescribed by the grantor.

8.1.1 California State grant requirements do not supersede Federal grant requirements. From both the state grants and federal grants must be complied with.

8.2.2. Federal Grants

All procurement related transaction shall be in accordance with 2CFR200. Purchasing transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, and invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business;*
- Requiring unnecessary experience and excessive bonding;*
- Noncompetitive pricing practices between firms or between affiliated companies;*
- Noncompetitive contracts to consultants that are on retainer contracts;*
- Organizational conflicts of interest;*
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and*
- Any arbitrary action in the procurement process.*

[HHS RFP Template & Instructions](#)

Executing Contracts

HHS Staff create relevant scope of work, budget and work with County Counsel to review contract templates, if any updates to approved County templates are required or if there are any relevant legal issues that arise during the contract negotiation process. If changes are made to a County Professional Services template County Counsel will review and approve any changes.

All contracts must follow the applicable HUD requirements, State, County and HHS Policies.

Contracts and amendments that are \$50,000 and higher require approval by the Board of Supervisors after the Subrecipient, or Contractor has reviewed and signed contract agreement documents. Prior to Board approval all relevant requirements must be met according to procurement standards, policies and procedures. The CoC Recipient, Subrecipient, and/or Contractor must provide necessary documentation as required by the County, State and Federal guidelines.

All Contracts and amendments must follow the relevant County policies to be accepted on the Board agenda for upcoming meetings and contract documents must be made available to the Board's staff per the Board and Clerk staff guidelines. In addition to the Board guidelines for submission of contract documents, HHS staff must comply with internal policies and procedures for executing and approving Contracts prior to moving forward to the Board for calendaring and final approvals.

Contracts less than \$50,000 are approved by the Office of County Executive and follow the same policies for procurement and contracting.

A contract amendment may be executed to amend an existing contract to change any relevant scope of work or budget modifications needed prior to the termination date of the contract. Contract amendments require the same procedures as new contracts.

All CoC Contracts and Sub-recipient Agreements will include references to relevant policies and procedures as outlined in this guide following HUD guidelines, County guidelines, and State and Federal guidance, and will include

- A) Scope of Work
- B) Fees and Schedule Payment
 - a. Payment terms and invoicing process
 - b. Relevant documentation submission deadlines and details
- C) Budget Outline for Term of Contract
- D) Funding Sources, including relevant CoC grant identifying numbers
 - a. Relevant Match details
- E) Administrative costs guidance
- F) Proof of Insurance required.
- G) Debarment certifications
- H) Monitoring and Reporting requirements

Other relevant policies:

- [Marin County Code, CA Municipal Code / Title 3 – Revenue and Finance / Chapter 3.08 Purchasing](#) – Defines the Purchasing Agent, Procurement Department within the County Structure, role and duties.
- County 3.10 Preference in Contracts and Purchases – defines local business preference: https://library.municode.com/ca/marin_county/codes/municipal_code?nodeId=TIT3REFI_CH3.10PRCOPU
- [County Professional Services Contract template](#)
- [Procurement Contract Requirements](#)
- [County Procurement Manual \(2023\)](#)
- [Accounts Payable Process](#)
- [HHS Contract Policy and Procedure](#)

Technical Assistance

Staff will provide technical assistance to sub-recipients to assist in the contracting process and applicable guidelines and timing.

Project Compliance

CoC Recipient, Subrecipient, and Contractor Compliance

Marin County oversees CoC activities according to program requirements in order to ensure fair and accurate sub-grantee program functions aligned with programmatic sub-contracts. The monitoring responsibilities associated with subrecipient use of CoC funds are primarily carried out by the Marin County Department of Health and Human Services and occasionally in coordination with staff from other cooperating jurisdictions.

County staff maintain regular telephone and email correspondence with subrecipients, monitor expenditures, and review documentation for services provided. Though responsibility for understanding and adhering to program requirements rests with subrecipients, Health and Human Services staff may provide ongoing technical assistance to ensure that all staff, CoC Recipient, Subrecipient, and Contractors are familiar with and understand program requirements.

Monitoring

Fiscal Monitoring and Reporting, Compliance

The County CoC require semi-annual reporting from each subrecipient as documented in the contract. Reports are due March 31 and October 31 and address the following topics:

- Equity work
- Client input
- Marin homeless system navigation

- Trauma
- Grievances

Subrecipient, and Contractors must provide actual costs for all invoices. Full documentation of costs with each invoice is preferred.

Concerns about compliance with contract terms, regulatory agreements, or other information obtained by staff may lead to a spontaneous on-site audit request. During this on-site audit, staff will request review of financial documentation of costs.

Contractors and Subrecipients, are required to submit an annual report during the program year. Staff review project reports submitted by recipients to identify the need for technical assistance or trigger a more thorough monitoring review.

Annual Monitoring

Subrecipients and contractors are monitored for compliance at least once annually.

Monitoring Subrecipient

- Reviewing financial and performance reports to ensure compliance and that all grant funds were expended for eligible costs.
- Review of payment and invoices, including requiring documentation of project administration costs related to the planning and execution of CoC activities including costs for staff and overhead directly related to carrying out overall program management, coordination, monitoring, and evaluation.
- Providing subrecipient with technical assistance and training on CoC program requirements and attending HUD sponsored CoC trainings.
 - [24 CFR 578.59(a)]
- Reviewing fiscal records for evidence that
- Ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the subaward detected through financial monitoring, on-site reviews, and regular and ongoing communication.
- Issuing a management decision for audit findings pertaining to the subaward as required by 2 CFR 200.521?

[24 CFR 578.99(e); 2 CFR 200.331(d)(1) – (3)]

[Link to Guide for Review of Financial Management and Audits](#) (Exhibit 34-1a) (2 CFR Part 200)

Project sponsors report on the number of clients served, and the race, ethnicity, and income of those clients.

Staff work closely with Subrecipient, and Contractor staff and directly observe the work that is being done. For Coordinated Entry grant staff, HHS staff also consult with case managers to determine the efficacy of Housing Locator staff. County Fiscal staff or County contracted auditors will complete annual HUD fiscal monitoring ([fiscal monitoring policy](#)) for Federal Funded contract or programs.

Monitoring and Compliance

At no time can Subrecipient, contractor or, its officers, or employees be debarred or suspended from doing business with the Federal Government.

This program shall undergo program and/or fiscal monitoring at least annually. MHA is expected to participate fully in such monitoring, by providing any requested files and documentation, furnishing requested information, and correcting any deficiencies identified on a timely basis.

Subrecipient, Contractor must comply with 24 CFR Section 578.23 and 2 Part 200 requirements:

- (1) To ensure the operation of the project(s) in accordance with the provisions of the McKinney-Veto Act and all requirements under [24 CFR part 578](#);
- (2) To monitor and report the progress of the project(s) to the Continuum of Care and HUD;
- (3) To ensure, to the maximum extent practicable, that individuals and families experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the project and in providing supportive services for the project;
- (4) To require certification from all subrecipients that:

The address or location of any family violence project assisted under this part will not be made public, except with written authorization of the person responsible for the operation of such project;

Subrecipients will establish policies and practices that are consistent with, and do not restrict, the exercise of rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness;

In the case of projects that provide housing or services to families, that subrecipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

The subrecipient, its officers, and employees are not debarred or suspended from doing business with the Federal Government; and

Subrecipients will provide information, such as data and reports, as required by HUD; and

- (5) To establish such fiscal control and accounting procedures as may be necessary to assure the proper disbursement of, and accounting for grant funds in order to ensure that all financial transactions are conducted, and records maintained in accordance with generally accepted accounting principles, if the recipient is a UFA;

- (6) To monitor subrecipient match and report on match to HUD;
- (7) To take the educational needs of children into account when families are placed in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education;
- (8) To monitor subrecipients at least annually;
- (9) To use the centralized or coordinated assessment system established by the Continuum of Care as set forth in [§ 578.7\(a\)\(8\)](#). A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system, provided that victim service providers in the area use a centralized or coordinated assessment system that meets HUD's minimum requirements and the victim service provider uses that system instead;
- (10) To follow the written standards for providing Continuum of Care assistance developed by the Continuum of Care, including the minimum requirements set forth in [§ 578.7\(a\)\(9\)](#);
- (11) Enter into subrecipient agreements requiring subrecipients to operate the project(s) in accordance with the provisions of this Act and all requirements under [24 CFR part 578](#); and
- (12) To comply with such other terms and conditions as HUD may establish by NOFA.

Significant Grant Amendments

Neither CoC recipients nor subrecipients may make any significant changes to projects without prior HUD approval as evidenced by grant amendments signed by HUD and the recipients. Significant changes substantially affect project implementation and represent a departure from the initial application. Grants Administration User Guide Page 14 Final A written request for a significant grant amendment must be made directly to the local HUD CPD field office, which will review the request, to approve or reject the amendment. Recipients and subrecipients are prohibited from proceeding with any changes unless HUD provides written approval. UFAs and CoCs with One Recipient For CoCs with only one recipient, significant changes are defined as:

- A change of recipient;
- A shift in a single year of more than 10 percent of the total amount awarded under the grant from one approved eligible cost category to another;
- A permanent change in subpopulation served by any one project under the grant; and
- A permanent reduction in the total number of units funded under the grant.

(source: [HUD CoC Program Administration User Guide, Section 4.1](#))

Remedial Actions and Sanctions

County Staff will issue a report of findings if subrecipient or CoC Recipient, Subrecipient, and Contractor is non-compliant. Findings will be issued, and County will work with the subrecipient

and CoC Recipient, Subrecipient, and Contractor on a timeline to ensure that their processes and polices are matching program guidelines.

CoC recipients may impose remedial actions and sanctions for failure to meet a program requirement in an effort to prevent a continuation of the deficiency, to mitigate its adverse effects or consequences, and to prevent its recurrence. If a recipient determines that a subrecipient is not complying with a program requirement or a subrecipient agreement, the recipient must perform one of the remedial actions set forth below or respond to one of the sanctions. The following sections describe remedial actions and sanctions that may be taken or imposed by both HUD and/or recipients. Remedial Actions Remedial actions as described at 24 CFR part 578.107(b)(1) may include the following:

- Developing and following a schedule of actions for carrying out project activities and projects affected by non-compliance, including schedules, timetables, and milestones;
 - Establishing and following a grants management plan that assigns responsibilities for carrying out remedial actions;
 - Canceling or revising project activities or projects likely to be affected by non-compliance before expending associated grant funds;
 - Re-programming grant funds not yet expended for given activities or projects to eligible costs or projects;
 - Suspending funds disbursement;
 - Reducing or terminating a subrecipient's remaining grant funds and re-allocating funds to other subrecipients or returning funds to HUD; and
- Requiring matching contributions to be made before or in conjunction with draws being made from the recipient's grant. ([CoC Program Grants Administration User Guide, Section 5.2](#))

Grant Close-Out Procedures

HUD formally closes out grants when a project is completed. HUD uses the same process when projects are terminated or no longer funded by HUD or when recipients discontinue a project. The closeout process includes notification from HUD communicated to the recipient through various methods, such as via written notice (postal mail or email) or telephone. HUD's grant closeout requirements are described at 24 CFR parts 84 and 85 and in other procedures established by HUD. Recipients must submit all reports required by HUD no later than 90 days from the date of the end of the project's grant term. Obligations remaining at closeout must be covered by the terms of the close-out agreement. The closeout agreement, which will be prepared by HUD in conjunction with the recipient, must include the following information:

- Identification of closeout costs or contingent liabilities subject to payment with CoC Program funds after the closeout agreement is signed;
- Identification of unused grant funds to be de-obligated by HUD;
- Identification of any program income on deposit in financial institutions;
- Description of the recipient's responsibility after closeout for compliance with all program requirements related to the use of program income and remaining CoC Program funds; use of real property; use of personal property purchased with CoC Program funds;

and compliance with requirements governing project income received subsequent to grant closeout; and

- Other provisions appropriate to any special circumstances of the grant closeout.

(source: [CoC Program Administration User Guide, Section 6](#))

FSRS

Subrecipients must be reported in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) at <https://www.fsr.gov/>.

Hatch Act (Political Activity)

Subrecipients and County Employees whose positions are funded by federal grants are subject to the provisions of the Hatch Act, which restricts political activity by federal employees to ensure that programs are administered in a nonpartisan manner. The Act is enforced by the [U.S. Office of Special Counsel](#), which provides detailed guidelines and resources on its website.

Restrictions on Political Activity:

1. Prohibited Political Activities:

- Employees whose salaries are funded in whole or in part by the CoC HUD grant cannot engage in political activities while on duty, in any government office, while wearing an official uniform, or using a government vehicle. This includes activities such as campaigning for a candidate, distributing campaign materials, or using official authority to influence an election.

2. Permitted Activities:

- These employees may participate in political activities in their personal time, such as volunteering for a campaign, attending political rallies, or donating to political candidates, as long as these activities do not interfere with their official duties or use government resources.

Enforcement and Compliance:

- The U.S. Office of Special Counsel (OSC) enforces the Hatch Act. If a Marin County employee working on the CoC HUD grant violates these rules, they could be subject to disciplinary actions, including termination of employment.

Implications for Marin County:

- Marin County must ensure that all employees working on federally funded projects, including those under the CoC HUD grant, are aware of these restrictions and comply with the Hatch Act to avoid penalties. This might involve providing training on the Hatch Act and monitoring compliance.

By adhering to these guidelines, Marin County can maintain the integrity of its federally funded programs and avoid potential conflicts of interest or the appearance of partisanship in the administration of its CoC HUD grant

Relevant Links: <https://www.marincounty.gov/departments/executive/budget-and-priority-setting/administrative-regulations/administrative-regulation-125>

Conflict of Interest

The prohibitions on conflicts of interest for Continuum of Care (CoC) programs are outlined in 24 CFR § 578.95. If any situation arises that might fall under these regulations, Marin County employees, subrecipients and CoC Recipient, Subrecipient, and Contractors must immediately consult with County Counsel to ensure compliance.

Guidance for Marin County Employees:

- **Immediate Action:** If you suspect a conflict of interest, do not attempt to resolve the issue on your own. Contact County Counsel for advice and clarification.
- **Avoid Reliance on Summaries:** Employees should not rely on summaries or secondary descriptions of these regulations. The requirement is strict adherence to the actual regulations.
- **Documentation:** Keep thorough documentation of any potential conflict situations and the steps taken to address them in consultation with County Counsel.

Following these steps will help ensure that Marin County remains compliant with federal regulations and avoids any conflicts of interest in the administration of CoC funds.

Financial Management

Recipient, Subrecipient and Contractor financial systems must comply with [2 CFR Part 200](#) (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards).

Specific regulations for HUD CoC grants are covered in [2 CFR Part 200](#) and [24 CFR Part 578](#) (CoC Program Interim Rule). All Recipients, Subrecipients, and Contractors must comply with these regulations.

eLOCCS Access

CoC funds are drawn down through the electronic Line of Credit Control System (eLOCCS) eLOCCS is the HUD primary grant disbursement system, involving disbursements for most HUD programs. Grant disbursements are facilitated via the Internet through the eLOCCS system. Customers (*users and approving officials*) are required to gain access to Secure Systems prior to accessing eLOCCS since it serves as an internet gateway between the public and the internal eLOCCS application.

See link below for guidance on eLOCCS Access Information and detailed guide to access the system for new users.

<https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:8947b38b-1e00-409a-bd5c-85243a0fbf97>

Link to [eLOCCS log-in screen](#)

Creating a new eLOCCS user can take up to two months. Assistant Public Health Division Director is the approving official for HHS on the eLOCCS account. The following positions/persons have user accounts and can draw down funds:

- Sr. Department Analyst,
- Accountant I

Draw Down Process

1. Quarterly expenses such as staff time, payroll records, subCoC Recipient, Subrecipient, and Contractor and subrecipient invoices paid by County are reviewed for the time period selected by fiscal and program staff (Sr. Dept. Analyst, and Accountant I).
2. Once expenses have been verified and confirmed internally a draw down total of expenses and relevant details such as invoice numbers, payment dates, amounts, payroll data and expense, and timestudies are logged into the HUD Summary Sheet and the summary is sent to the Program Manager for review and verification.
3. Matching expenses (paid by County General Funds or other funding source not paid for by Federal Funds) of 25% are reviewed for the same time period and steps as outlined in steps 1 & 2.
 - a. *Cost sharing or matching* means the portion of project costs not paid by Federal funds or contributions (unless otherwise authorized by Federal statute). [See also § 200.306](#).
4. Once summary and expenses have been approved internally, a Draw Down via ELOCCS is submitted and voucher is saved in the HUD grant program folder.
5. A copy of the draw down is sent to HCC staff and accounts receivable with notification of incoming funds and coding details – insert snip here
6. Once payment is received the date is logged into the HUD Summary Sheet

HUD Grant Agreements

HUD typically initiates the grant agreement process 2-4 months after CoC competition awards have been announced. HHS staff must complete a staff report with any necessary budget adjustments to be approved by the [County Board of Supervisors](#) and [Office of the County Executive](#).

Subrecipient, and Contractor and Subrecipient invoicing and reimbursement process

- a. Marin County distributes subcontracted CoC funds on reimbursement basis upon submission of an invoice to program staff following HHS, and Homelessness and Coordinated Care billing policies (see attachment x)
- b. All invoice payments are processed following relevant County, State, and HUD policies:
 - i. [Department of Finance, Accounts Payable Public Website](#) with relevant policies

- c. Cost Sharing / matching: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.306>Invoices are reviewed by the Staff Accountant and backup documentation provided to ensure that the invoices are accurate and match all back up provided. The accountant also reviews the invoices against the approved budget which is outlined in the subcontract to ensure that the expenses match budget categories.
 - i. Invoices are reviewed to ensure compliance with [2 CFR 200.1 “Expenditures”](#)
- d. Once invoice has been reviewed by Accountant, the invoice is then sent to and reviewed by the Contract Manager who reviews the invoice based on the contract performance specifications and program deliverable outlined in the executed contracts, and to ensure compliance with HUD guidelines. Once program review has been completed the invoice gets sent to accounting staff with relevant account coding details.
 - i. [Accounts Payable End User Procedural Manual](#)

COC & Planning Grants Drawdown process

- A. Once invoices are paid against a subrecipient agreement or contract and payment has been issued to the Subrecipient, and Contractor, County may request reimbursement from HUD via the drawdown process in ELOCCS system.
- B. Each Drawdown is tracked in a spreadsheet maintained by fiscal staff, and drawdowns are completed in eLOCCS by the Department Analyst / or Staff Accountant quarterly Fiscal staff review invoice payments quarterly and create a drawdown calculation which is reviewed by program staff to ensure that program compliance has been met.
- C. Each Draw Down must identify County Matching expense: 2 CFR 200.1 “Cost sharing or matching.”
- D. Once a drawdown has been completed, accounts receivable staff is notified to expect an incoming payment and relevant accounts to record the payment to.
- E. All records are kept per the retention guidelines as outlined by HUD and County policies.
 - a. [County Cash Handling Policy](#)

The County’s fiscal year-end does not coincide with our federal grants cycle. The end of July is the deadline for processing County fiscal year invoices in Munis. As the end of the year approaches, staff monitor the remaining balances on projects. Staff should only draw down the proportion of each HUD grant contracted for that fiscal year. For example, Coordinated Entry grants run from November 1st to October 31st; 2/3 of each grant is budgeted for November through June, and the remaining 1/3 for July through October of the following fiscal year. Drawdown requests should be made as soon as possible after receiving June invoices to ensure funds can be applied to the appropriate fiscal year.

1. Grant Approval and Allocation Process:

- Before the acceptance of an award, it must go through an internal approval process. This includes vetting by the Grant Coordination Team and approvals from division management, finance, and legal teams.
 - Once approved, funds are allocated based on specific program needs, with clear guidelines on how funds can be used. This is often influenced by the grantor's requirements and the county's strategic priorities.
2. **Grant Monitoring and Reporting Requirements:**
 - Regular monitoring of grant-funded programs is mandatory. This includes tracking financial expenditures, ensuring compliance with grant conditions, and preparing periodic reports.
 - Grant managers are required to submit quarterly and annual reports that detail both financial and programmatic progress. These reports must align with the objectives outlined in the grant agreement.
 3. **Compliance and Audit Protocols:**
 - Compliance with federal, state, and local regulations is crucial. This involves maintaining detailed records of all expenditures and activities funded by the grants.
 - Grants are subject to audits, and the manual outlines the procedures for both internal and external audits. Non-compliance can result in penalties or the revocation of funds.
 4. **Risk Management:**
 - The manual emphasizes the importance of identifying potential risks in grant management, such as changes in funding levels or shifts in program requirements.
 - It suggests strategies for mitigating these risks, including maintaining open communication with funders and conducting regular internal reviews.

[HHS Grant Management Policy and Procedure](#)

AUDITS/RECORDS:

Schedule of Expenditures of Federal Awards (SEFA)

A nonprofit or governmental organization with federal expenditures in excess of \$750,000 must prepare a Schedule of Expenditures of Federal Awards and arrange for an audit of their federal assistance to be conducted by an independent auditor. This audit is known as the Single Audit.

A Single Audit is often referred to as a Uniform Guidance Single Audit. This is because the general provisions applicable to most federal awards are contained in [Title U.S. Code of Federal Regulations \(CFR\) Part 200\[External\]](#), *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), a portion of the federal law that contains the requirements for obtaining, operating, and auditing federal programs.

A Single Audit includes an audit of both the financial statements and the federal awards, and reviews how an organization managed the grant to ensure that applicable rules for dollars associated with the grant or award were followed. Single audits have a significant public interest

component as they are relied on by federal agencies as part of their administrative responsibilities for determining compliance with the requirements of federal awards by non-federal entities.

The County of Marin's Single Audit Reports are found on the Department of Finance Website: <https://www.marincounty.gov/departments/finance/internal-audit/single-audit-reports>

[Department of Finance Internal Audit Site](#)

Annual Comprehensive Financial Report (ACFR)

The Annual Comprehensive Financial Report of the County of Marin is presented in accordance with Section 25253 of the Government Code of California. The report contains financial statements that have been prepared in accordance with generally accepted accounting principles (GAAP) prescribed for governmental entities, and provides a comprehensive overview of the County's financial operations and financial position.

[Department of Finance, Annual Comprehensive Financial Report Site](#)

Record Retention for Audits

Subrecipients and Contractor shall maintain books, records, files, documents and other evidence directly pertinent to all work under this Agreement in accordance with accepted professional practices and accounting procedures and according to statutory agreements for the applicable time mandated, and in no case less than ten (10) years after the termination of the Agreement. County, or any of its duly authorized representatives, shall have access to such books, records, files, documents and other evidence for purposes of inspection, evaluation, audit or copying. Contractor will furnish County a certified copy of an Audit Report from an independent CPA firm as requested by County, for the report most recent fiscal year(s) that most closely covers the last completed County fiscal year. The Audit Report will include the independent CPA firm's review of each program operated by Contractor, with review of both expenditures and revenues for each program.

Per, 24 CFR 578.103(a)(17):

- (17) ***Subrecipients and contractors.***
- (i) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable.
- (ii) The recipient must retain documentation of monitoring subrecipients, including any monitoring findings and corrective actions required.

(iii) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in [2 CFR part 200, subpart D.https://www.ecfr.gov/current/title-24/part-578/section-578.103#p-578.103\(a\)\(17\)](https://www.ecfr.gov/current/title-24/part-578/section-578.103#p-578.103(a)(17))

Appendix A (biannual reporting form for subrecipients and contractors)

[Link to HHS Contract Management Policy](#)

[Link to HHS Grant Management Policy](#)

[Link to HHS Fiscal Monitoring Policy](#)

Appendix A

Homelessness and Coordinated Care Client Services Contracts Reporting Requirements

Biannual Reporting Requirement

Please submit a brief report on March 31st and October 31st addressing the following topics related to this contract's specific services. Instructions below:

1. Equity work	2. Client input	3. Marin homelessness system navigation
4. Trauma	5. Grievances	

1) Equity work:

- i) What is your organization doing to provide services in a more equitable way? Examples may include participating in equity training initiatives, making materials more accessible, incorporating equity In staffing, incorporating diverse client input into program design and evaluation, etc.

2) Client input:

- i) How are you gathering client input, using it to improve services, and reporting back to clients what you heard?

3) Marin homelessness system navigation:

- i) Homelessness system navigation goals:
 - (1) Clients are able to navigate/care for themselves and have agency in their care
 - (2) Services and the system of care are straightforward to navigate
- ii) Discuss barriers to navigating the system that you have seen/heard clients experience as a team and then answer the following question in your biannual report:
 - (1) What are the top barriers you discussed?
 - (2) What is your organization doing to address these barriers?
 - (3) Are there barriers that disproportionately impact members of specific demographic groups and what are you doing to address them?
 - (4) Please identify the top few barriers that are beyond the control of just your organization which we should be working on collectively.

4) Trauma:

- i) Trauma Informed Care and Secondary Trauma goals:
 - (1) We provide equitable trauma informed care by which we mean care that assumes everyone has trauma exposure in their history and that informs our interactions with clients, staff, -and partners.
 - (2) We assess for and address Secondary Trauma among our staff
 - (a) Possible screening tool: Professional Quality of Life Scale (PROQOL) Compassion Satisfaction and Compassion Fatigue
- ii) Discuss as a team how you are training for and implementing trauma informed practice then answer the following question in your biannual report:
 - (1) What is your organization doing to train for, incorporate into practice, and assess Trauma Informed Care?
 - (a) What are you doing to assess and address Secondary Trauma among staff?

5) Grievances:

- i) Since your last report, how many grievances have you received and in general, how were they investigated?

- ii) Please report the count of the grievances above by outcome category:
- (1) Resolved to client's satisfaction
 - (2) No finding
 - (3) Unable to resolve
 - (4) Other (please specify)