



# Continuum of Care (“COC”) Match Program

Program Manual



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## PROGRAM PURPOSE

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The purpose of the MFA Continuum of Care (CoC) Match Program is to provide “match” funding to agencies that receive federal (HUD) Continuum of Care funds. Recipients of the federal funding are required to match the amount they receive and use those funds for costs that are eligible under 24 CFR 578.73, subpart D. This program provides that through funding from the state of New Mexico, while encouraging subrecipients to meet and exceed HUD performance measures. Overall, meeting these measures will increase the state of New Mexico’s effectiveness in responding to homelessness, and will ensure that the state is as successful as possible in the annual national competition for HUD Continuum of Care funds. In 2021, this competition provided \$11,025,488 to New Mexico for housing and services.

The program is implemented through a partnership with the New Mexico Coalition to End Homelessness (“NMCEH”), that coordinates the state’s two Continuums of Care, Albuquerque and Balance of State. NMCEH is responsible for ensuring all agencies’ applications and renewals for the federal award are submitted to HUD, and for preparing the overall application for each continuum.

## FUNDING DESCRIPTION AND CONDITIONS

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In order to be eligible for MFA’s Continuum of Care Match Program funds, agencies must meet the following requirements:

1. Selected to receive HUD’s Continuum of Care funds and possess a fully executed grant agreement with the New Mexico Coalition to End Homelessness
2. Provide an independent CPA’s auditor’s report (audit), or audited financial statements, conducted in accordance with government auditing standards generally accepted in the United States of America.
3. Obtain proof of registration as a charitable organization with the NM Attorney General’s Office for the current fiscal year.
4. Provide the 9-digit DUNS number from registration through sam.gov. MFA will verify status of sub-recipient on “HUD’s Limited Denial of Participation” website.

## PERFORMANCE MEASURES

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MFA and NMCEH have agreed upon three sets of performance measures, (Permanent Housing, Transitional Housing, and Supportive Services Only), that are the three categories of HUD Continuum of Care funds. These initial measures are based on HUD’s national performance measures as outlined below.

### **1. Permanent Supportive Housing**

*Permanent Supportive Housing* is an intervention that combines affordable housing assistance with voluntary support services to address the needs of chronically homeless people. The services are designed to build independent living and tenancy skills and connect people with community-based health care, treatment and employment services.

## 2. **Transitional Housing:**

*Transitional Housing* is supportive housing that helps fight the homeless problem in today's society. Transitional housing is generally for a limited period of time. Stays can be from two weeks to twenty-four months.

## 3. **Supportive Services Only (SSO):**

The *Supportive Services Only* program component allows recipients and subrecipients to provide services to homeless individuals and families not residing in housing. SSO funds may be used to conduct outreach to sheltered and unsheltered homeless persons and families as well as link clients with housing and other necessary services.

# FUNDING REQUIREMENTS

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## *PROGRAM REGULATIONS*

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The Continuum of Care Match Program funds can be used for a wide range of eligible activities associated with a currently operating Continuum of Care program administered by the recipient. All activities and expenses must have prior approval from MFA through the contract budget.

The eligible activities allowed are those defined by HUD for the Continuum of Care Supportive Housing Program and Permanent Supportive Housing Program:

### 1. **Supportive Services**

According to 24 CFR 578.53 "Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants." Services that directly facilitate the movement of participants experiencing homelessness to independent living are also eligible and include outreach, case management, childcare, job training/placement, health care, transportation and assistance with moving. Subrecipients are encouraged to augment the support received in this activity via mainstream resources like Medicaid or Supplemental Security Income (SSI).

Some examples of additional eligible expenses include:

- Housing search and counseling services
- Legal services
- Mental health services
- Outreach services
- Shelter/office utilities, repair or maintenance
- Transportation (gas, insurance, maintenance, bus and train passes)

### 2. **Operating Costs**

Operating costs are those costs associated with the day-to-day physical operation of *Transitional* and *Permanent Housing Facilities*. They also include the actual expense that a subrecipient incurs for conducting ongoing assessments of the supportive services needed by residents and the availability of these services.

Operating costs differ from supportive services costs in that operating costs support the function and the operation of the housing project while supportive services costs cover the actual costs of new or increased services.

Funds may not be used for the costs associated with operating a *Supportive Services Only* (“SRO”) facility or emergency shelter.

Some examples of eligible expenses include:

- Utilities
- Equipment (desks, computers, phones used by staff involved in operating the housing program) and maintenance/repair of this equipment
- Supplies
- Insurance
- Funds *can be used* for maintenance and repair costs including hardscaping, walkways and grading. Landscaping for beautification is not eligible.
- Costs related to the operation of the designated HMIS system

Subrecipient staff may often carry out supportive services activities in addition to operations. In this case, their expenses must be separated. MFA will need documentation, such as personnel activity reports or time and effort reports, to show how the costs were assigned, when submitting the expense report for reimbursement.

### **3. Ineligible Expenses**

- Mortgage payments
- Leasing
- Acquisition
- New construction
- Recruitment or on-going training of staff
- Depreciation
- Costs associated with the organization rather than the supportive housing project (fund raising efforts, printed materials about the organization, etc.)
- Cable TV costs for participants
- Life skills program or other type of service program with a religious component
- Purchase of computers with internet connection to be placed in clients’ rooms
- Criminal background checks of prospective clients
- Recreational activities
- Match for client savings in an individual savings account
- The purchase or repair of a car for a client in areas lacking public transportation

## *FINANCIAL REGULATIONS*

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The financial management and tracking of CoC Match Program funds must meet the standards set forth in 2 CFR 200.302. Most subrecipients are subject to 2 CFR 230 for tracking their expenditures however, if the subrecipient is a unit of local government or a special purpose governmental agency, it is subject to 2 CFR 225.

## PROGRAM ADMINISTRATION

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### *ANNUAL FUNDING*

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Agencies apply for funds through an annual limited source procurement process (as noted in the *Program Purpose* on page 3 of this document). MFA works with NMCEH to determine which agencies have a current executed grant agreement with HUD's Continuum of Care Program. These agencies will receive an application for MFA's Continuum of Care Match Program award with a checklist of documents needed. MFA reviews the information provided by NMCEH along with the application package and issues awards to qualifying agencies.

### *CONTRACT PROCEDURES*

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Continuum of Care Match Program funds are issued through individual, separate contracts to eligible subrecipients. Once all signed contract documents are received by MFA, contracts are approved and executed as of July 1 for the upcoming program year and must be spent within the twelve-month term of the contract, ending June 30.

### *QUARTERLY INVOICING AND REPORTING REQUIREMENTS*

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Funds are provided on a reimbursement basis. Invoices are due quarterly as follows: October 10<sup>th</sup>, January 10<sup>th</sup>, April 10<sup>th</sup> and June 14<sup>th</sup>. Invoices should be complete and correct and should be accompanied by the SF10 reports for the quarter and all backup documents, including program-specific general ledger. An agency may elect to submit invoices less often than quarterly as long as all grant funds are spent by the end of the program year and SF10 reports are submitted for all 12 months of the contract term. This requirement ensures that the subrecipient is consistently entering all expenditures and client data in the Homeless Management Information System (HMIS).

If the agency is a victim services provider (DV), it may use these funds to establish and operate Osnum, a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

All invoicing and reporting is submitted through the online invoicing system at <http://local.housingnm.org/LoginPortal>. The Online Invoicing User Manual can be found on the home page.

### *MONITORING REQUIREMENTS*

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All subrecipients are monitored annually by the New Mexico Coalition to End Homelessness (NMCEH) as a requirement by HUD in order for them to receive their federal COC award. The Albuquerque COC and Balance of State (BOS) COC have written into their standard operating procedures that a copy of all COC Monitoring Results Reports be provided to the appropriate Program Manager at MFA. These reports are kept in each subrecipient's permanent file for the Continuum of Care Match Program at MFA.

## PARTICIPANT ELIGIBILITY

The Continuum of Care Match Program does not impose specific income or rent limits; however, all participants assisted must meet the eligibility requirements for the subrecipient’s HUD COC program, which may include income and/or rent limits. All participants must meet the *HUD Definition of Homelessness*, and for agencies with all COC programs other than *Supportive Services Only*, there must be third party documentation in the file according to the following checklist:

Who is your organization serving?	Then you need to...	This means...
Persons living on the street	Certify that the persons served reside on the street.	For those SHP projects providing services—such as outreach, food, health care, clothing—to persons who reside on the streets (but not in shelters or other places meant for human habitation), the outreach or service worker needs to sign and date a general certification that:  1) verifies that the services are going to homeless persons, and  2) indicates where the persons served reside
Persons coming from living on the street (into a place meant for human habitation)	Obtain information to indicate that the participant(s) is coming from living on the street.	Verify that an individual is coming from the street through:  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> organizations or outreach workers who have assisted him/her in the past;  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> determining where the resident receives assistance checks, if applicable; and/or  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> other information regarding the participant’s recent past activities  Document verification efforts! Staff should prepare a statement that is then signed and dated.  As a last resort, if you are unable to verify in this manner that the person is coming from living on the street, the participant or a staff member may prepare a written statement about the participant’s previous living place and have the participant sign the statement and date it.
Persons coming from an emergency shelter	Verify from the emergency shelter staff that the participant has been residing at the shelter.	Obtain from the referring agency a written, signed, and dated verification that the individual has been a resident of the emergency shelter.
Persons coming from	Verify with the transitional housing staff that:	Obtain from the referring agency two written, signed, and dated verifications:

transitional housing for homeless persons	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> the participant has been residing at the transitional housing; and  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility or was discharged from an institution or evicted prior to living in the transitional housing and would have been homeless if not for the transitional housing.	1) a signed statement from the transitional housing staff indicating that the individual had been a resident there; and  2) the referring agency’s written, signed, and dated verification as to the individual’s homeless status when he/she entered their program. If the referring agency did not verify the individual’s homeless status upon entry into their program, you will need to verify that status yourself. That is, in addition to the written, signed, and dated verification from the referring agency that the individual has been residing in the transitional housing, you need to verify their status upon entry into transitional housing and document that status according to the instructions here. (For example, if the person was living on the streets before moving into the transitional housing, you will need to obtain the documentation required under “Persons coming from living on the street” above.)
Persons being evicted from a private dwelling	Have evidence of the eviction proceedings.	Obtain two types of information:  1) documentation of:  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> the income of the participant;  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> what efforts were made to obtain housing; and  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.  2) documentation of one of the following:  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> for formal eviction proceedings, evidence that the participant was being evicted within the week before receiving homeless assistance;  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> where a participant’s family is evicting, a signed and dated statement from a family member describing the reason for the eviction;  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> where there is no formal eviction process (in these cases, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control), two things are needed:  - a signed and dated statement from the participant describing the situation; and  - documentation and verification (through written, signed, and dated statements) of efforts to confirm that these circumstances are true.
Persons from a short-term stay (up to thirty	Verify from the institution staff that the	Obtain the following:



consecutive days) in an institution who previously resided on the street or in an emergency shelter	participant has been residing at the institution and was homeless before entering the institution.	<p>1) written verification from the institution’s staff that the participant has been residing in the institution for less than 31 days; and</p> <p>2) information on the previous living situation. Preferably, this will be the institution’s written, signed, and dated verification on the individual’s homeless status when he/she entered the institution. If the institution’s staff did not verify the individual’s homeless status upon entry into the institution, you will need to verify that status yourself, according to the instructions here (i.e., if the person was living on the streets before moving into the institution, you will need to obtain the documentation required under “Persons coming from living on the street”).</p>
Persons being discharged from a longer stay in an institution	Verify from the institution staff that the participant has been residing at the institution and will be homeless if not provided with assistance.	<p>Obtain the following, signed and dated:</p> <p>1) evidence from the institution’s staff that the participant was being discharged within the week before receiving homeless assistance; and</p> <p>2) documentation of the following:</p> <ul style="list-style-type: none"> <li>- the income of the participant;</li> <li>- efforts made to obtain housing; and</li> <li>- why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.</li> </ul>
Persons fleeing domestic violence	Verify that the participant is fleeing a domestic violence situation.	Obtain written, signed, and dated verification from the participant that he/she is fleeing a domestic violence situation. If the participant is unable to provide the verification, you may prepare a written statement about the participant’s previous living situation and have the participant sign and date it.

## REFERENCES

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The information provided in this program manual supports the MFA Continuum of Care Match Program Performance Agreement. Additional ESG requirements and guidelines can be found on the HUD Exchange website in the COC Interim Rule. If further guidance is needed, go to “Ask A Question” on the HUD Exchange.