

**Homeless Continuum of Care of Stark County (HCCSC)  
Ohio Housing Finance Agency (OHFA) COVID19-  
Standards for Sub-Recipient Recordkeeping Requirements**

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Purpose. The Ohio Housing Finance Agency (OHFA) on March 18, 2020, approved financial assistance for the OHFA Emergency Housing Assistant Grant Program. The Homeless Continuum of Care of Stark County (HCCSC) has established recordkeeping policies for this one-time OHFA funding opportunity that expires on March 31, 2021.

**Section - I. Recordkeeping Requirements for OHFA Emergency Housing Assistant Grant Program Sub-grantee Projects**

A. In General. Every sub-grantee of OHFA grant funds must establish and maintain standard operating procedures for ensuring that those funds are used in accordance with the requirements of the OHFA Emergency Housing Assistance Grant Program Guidelines and the HCCSC's Ohio Housing Finance Agency (OHFA) COVID19-Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance. Sub-grantees must maintain sufficient records and enable the HCCSC's Collaborative Applicant and OHFA Grantor, Stark Housing Network, Inc. (SHNI), access to these records.

1. Records, Access, and Maintenance

i. Sub-grantee must:

- a. Establish and maintain for at least three (3) years from the expiration or termination of grant agreement such records as are required by Grantor, including but not limited to, financial reports, intake and participant information, and all other relevant information.
- b. Provide records required by Grantor with respect to any questioned costs, audit disallowances, litigation or dispute between Grantor and Sub-grantee shall be maintained for the time needed for the resolution of said question and that in the event of early termination of the grant agreement, or if for any other reason Grantor shall require a review of the records related to the Project, Sub-grantee shall, at its own cost and expense, segregate all such records related to the Project from its other records of operation.
- c. Provide an updated OHFA COVID-19 Emergency Housing Assistance Grant Tracking Report Template to the SHNI on a monthly basis, starting one month after receipt of funding. Reporting will continue to be due on the 15th of every month until the month following the exhaustion of funds.
- d. Provide reports from Homeless Management Information System (HMIS) data input to the OHFA COVID-19 Emergency Housing Assistance Grant Tracking Report Template, including information about recipients, i.e. date of birth, age, race, ethnicity, income, geographic origination information, family status, members in household, etc. Data should be anonymized and de-identified prior to reporting through the use of a hashing process. The hashing process will provide a unique identifier in lieu of personal identifying information.
- e. In the event of Unusual Circumstances Affecting Performance that the Sub-grantee cannot meet any or all of the obligations placed upon it by the terms of the grant agreement the Sub-grantee shall immediately notify Grantor (SHNI) in writing.
- f. Submit to Grantor a Final Performance Report within 60 days of the end of the term of the grant agreement. This status report should be accompanied by details of individuals assisted, from HMIS system, OHFA COVID-19 Emergency Housing Assistance Grant Tracking Report Template and any other systems that are used for reporting and tracking grant relevant information.

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2. Standard Sub-grantee OHFA Operating Procedure Policies

- i. Sub-grantee must abide by the following operating policies:
  - a. Acceptance into OHFA Project. Projects will accept referrals from Coordinated Entry and verify applicant eligibility.
  - b. Intake Process. Sub-grantee will complete the intake process including eligibility documentation requirements, Fair Market Rent calculation, any forms that may be utilized (ex. zero-income self-certification), and if applicable, participant verification of receipt of any agency project guidelines and/or policies (ex. receipt of HMIS Release of Information and Cause for Termination Statement).
  - c. OHFA Assistance Calculation. Sub-grantees will abide by a Universal Procedure established to determine the amount of assistance that the project will provide to participants including how much rental assistance will be provided and the length of assistance, based on the individualized assessment of the participant and potential negotiations with the landlord. Procedures must align with the Homeless Continuum of Care of Stark County (HCCSC) Ohio Housing Finance Agency (OHFA) COVID19- Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance.
  - d. Tracking OHFA Participants Assistance. Sub-grantee must track assistance and funds provided to participants via the Homeless Management Information System (HMIS) for the OHFA COVID-19 Emergency Housing Assistance Grant Tracking Report Template.
  - e. Prioritization of Eligible OHFA Participants. Agencies will take referrals from the Prioritization List. Agencies will document updates to the list in a timely manner.
  - f. Participant File Confidentiality. Sub-recipient will follow the HCCSC's System Privacy & Security Policies.
  - g. Conflict of Interest. Sub-Grantees will abide by the Conflict of Interest Statement included in the Sub-Grantee Grant Agreement. If a referral is for a household being served in another program of a sub-grantee, that household may not be assisted with OHFA assistance from the same sub-grantee. However, the referred household may still be served with OHFA assistance by another sub-grantee administering the OHFA program.
  - h. Participant Termination. Sub-grantee's may terminate a participant from the program under the following circumstances:
    - i. Fraud
    - ii. Failure to report income within the specified timeframe (ten days)
    - iii. Failure to make contact with sub-grantee for thirty (30) days
    - iv. Violent or Threatening behavior towards staff
    - v. Head of Household has deceased and there is no co-applicant
    - vi. Failure to comply with established financial assistance plan

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**Section – II Recordkeeping Requirements for OHFA Emergency Housing Assistant Grant Program - Project Participant Eligibility Required Documents**

A. OHFA Participant Eligibility Required Documentation

1. Eligibility Documentation. Every sub-grantee of OHFA grant funds must establish and maintain eligibility documentation in a participant file to ensure that those funds are used in accordance with the requirements of the OHFA Emergency Housing Assistance Grant Program Guidelines and the HCCSC’s Ohio Housing Finance Agency (OHFA) COVID19- Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance.
  - a. Identification. Participant acceptable identification documentation includes a driver’s license or state identification card indicating that the participant is a resident of Stark County; geographical area must be included in the documentation.
  - b. HMIS Release of Information. The Participant Informed Consent and Release of Information Authorization form must be signed by each Participant seen in person whose data is to be entered into the HMIS. Verbal consent must be obtained in situations where the Participant is not seen in person, such as telephone intakes, registrations, and assessments. Participant refusal to sign the consent or verbally agree to data sharing will prevent individual data from being shared. The non-identifying data will still be used in aggregate reports.
  - c. Household Composition. Household Composition and family-status of all members in household must be included in file.
  - d. Household Demographics. Documentation including date of birth, age, race, ethnicity, income, geographic origination information for all household members must be included in file.
  - e. Sub-grantees will document the agency’s attempts to contact applicants for assistance and document applicants’ failure to respond to the agency. Agencies have the ability to move on after two attempts within three business days from the first day on contact.
  - f. COVID19 Health and/or Income Hardship. Verification of a decline in wages, unemployment, or health impact acceptable documentation includes the following: participant pay-stubs backdating from the date requesting assistance; letter from employer; unemployment letter and/or verification that unemployment has been applied for; zero-income self-certification form signed by participant. .
  - g. Fair Market Rent (FMR) Eligibility. Documentation for calculating rental payments which must not exceed 120% of the HUD Fair Market Rent (FMR) for the CoC service area.
  - h. Imminent Risk or Imminent Eviction (At-Risk). Acceptable forms of documentation includes the following: a court ordered eviction notice; a notice from landlord to vacate the premises; signed statement from owner/tenant of location being asked to leave, including the date in which the participant is required to leave the premises; template letter signed and dated by the landlord/owner/tenant asking participant to vacate the premises; and in some cases a self-report with supporting documentation if released by an institutional setting (any health record documentation that includes a diagnosis or any medical information should be blacked-out or removed prior to placing documentation in file).

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- i. Resources Exhausted. Documentation that other community resources were attempted prior to providing OHFA assistance. Acceptable forms of documentation include a participant signed community resources list provided by agency.