

# TX-503 Austin/Travis County CoC Program Expectations and Recordkeeping Acknowledgement

The Ending Community Homelessness Coalition (ECHO) serves as the Collaborative Applicant and Lead Agency for the Austin / Travis County Continuum of Care and is charged by the CoC Board, Leadership Council, with monitoring and facilitating CoC activities, as well as analyzing CoC Program recipient performance as expected by HUD of CoCs (24 CFR Part 578).

To clarify expectations, ECHO has established CoC Program Recipient expectations in this document to be signed annually by an authorized representative of the CoC Program Recipient agency. New project applicants are also required to complete this document, which commits the Applicant to uphold Recipient responsibilities should funds be awarded. By signing this document, applicants/recipients of CoC funds commit to the adherence of CoC program expectations and recordkeeping requirements, as applicable to the awarding NOFO.

The CoC Program Recipient is responsible for adhering to all requirements and obligations outlined by HUD in addition to the expectations outlined by the Austin / Travis County CoC in this document. In the event that HUD regulations, guidance, or priorities change, ECHO staff will revise these expectations to align, and a new signature by an authorized representative of the CoC Program Recipient agency will be required.

Completion of this document is a threshold requirement for inclusion in the Priority Listing of the applicable CoC NOFO of all applications seeking award.

Please initial next to each expectation below. The full scope of each expectation is outlined below.

	Federal Familiarity
	HMIS Participation and Coverage
	Consumer Involvement
	Project Parameters
	General Recipient Performance & Expectations
	Project Oversight
	CoC Engagement

The expectations in this form are not intended to be interpreted as an exhaustive list of responsibilities for Recipients of CoC Program Funds. It is understood that should any expectation in this document conflict with Federal, or State statutes, the remaining expectations remain valid. My signature below acknowledges these expectations and to the greatest extent possible, the commitment to comply with them.

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**AUTHORIZED AGENCY REPRESENTATIVE INFORMATION**

Agency	
Contact Person	
Email Address	
Contact Number	

I have read, understand, and agree with the expectations set forth in this agreement. (Current Recipients acknowledge these expectations become effective upon date signed below)

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Signature

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Date

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Printed Name and Title

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## Appendix A: Scope of Expectations for CoC Program Funds

### Federal Familiarity

Before applying for renewal or new CoC Program funding, all Project Applicants should read the following items:

[CoC Program Interim Rule \(24 CFR Part 578\)](#), as it provides the requirements for implementation and administration of the CoC Program.

[Opening Doors](#)

[Home, Together](#)

[Austin / Travis County CoC Policies and Procedures](#)

[Austin / Travis County CoC Written Standards for Program Delivery](#)

[Austin / Travis County CoC Coordinated Entry Written Standards](#)

New Project Applicants are strongly encouraged to be familiar with the [CoC Program Binders](#) upon award notification from HUD. Additionally, recipients should complete the following trainings:

[CoC Program Administration](#)

[Financial Management Curriculum](#)

### HMIS Participation and Coverage

CoC Program Recipients must collect information on persons served and services provided during the grant period and enter this information into the Austin/ Travis County's Homeless Management Information System (HMIS), ServicePoint.

Victim Service Providers (VSPs) are prohibited from participating in HMIS. VSPs must demonstrate that they have a database comparable to an HMIS and are able to provide aggregate data and HUD-mandated reports from that database upon request. (Ex: Osnum) For more information about mandated exclusions from HMIS and whether your Agency is affected, please follow [this link to the HUD Exchange](#).

CoC Program Recipients must also:

Adhere to the HMIS Policies and Procedures Manual and User Agreements, including timeliness expectations

Designate and utilize an HMIS Agency Admin as required by the Agency Agreement

Attend mandatory HMIS webinars, as scheduled

Complete Monthly Data Quality Reports (UDQ) to submit by the deadline identified by HMIS Staff,

Make corrections to those, or other reports as requested by HMIS staff

Commit to a process of data quality improvement by, running and reviewing Annual Performance Reports (APRs) and Data Quality Reports on a monthly basis.

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## Consumer Involvement

All Project Recipients & Subrecipients are required to have an individual or individuals with lived experience on the Board of Directors or other equivalent policymaking entity. Recipients must keep a letter on official letterhead documenting that at least one person currently experiencing homelessness or formerly homeless serves on the Board or other equivalent policy-making entity.

Project Recipient & Subrecipients are encouraged to involve individuals experiencing homelessness and project participants in the project design and in project improvement activities.

## Project Parameters

Projects must follow all the [Austin / Travis County CoC Policies and Procedures](#) and the [Austin / Travis County CoC Written Standards](#), including both the general expectations and the specific requirements for the project type. Recipients are expected to maintain Policies and Procedure manuals for the CoC projects they operate which detail project eligibility determination, service delivery, federal compliance, and project policies in line with the Austin / Travis County CoC Policies and Procedures and the Austin / Travis County CoC Written Standards.

Specifically, all projects must maintain:

- **Conflict of Interest:** Policies should cover both agency-level conflicts as well as individual conflicts. See HUD CoC Interim Rule (24 CFR part 578.95) for guidance.
- **Faith-Based Activities:** Policies should cover equal treatment of program recipients and separation of explicitly religious program activities. See HUD CoC Interim Rule (24 CFR part 578.87) for guidance.
- **Fair Housing:** Policies should cover nondiscrimination and equal opportunity requirements, affirmatively furthering fair housing, accessibility for persons with disabilities, and prohibition against involuntary family separation. See HUD CoC Interim Rule (24 CFR part 578.93) for guidance.
- **Record keeping:** Policies should cover the elements outlined in the [Internal Wellness Checklist for CoC Programs](#). See HUD CoC Interim Rule (24 CFR part 578.103) for guidance.
- **Violence Against Women Act:** Policies should cover elements outlined in local [CoC VAWA Policy](#) including domestic violence and emergency transfer plan. See HUD CoC Interim Rule (24 CFR part 578) for guidance.

Coordinated Entry Participation in a Coordinated Entry (CE) process is a requirement of 24 CFR Part 578 for all Recipients of CoC Program funds.

## General Recipient Performance & Expectation

Recipients must receive approval from ECHO, the Austin / Travis County CoC Collaborative Applicant, prior to requesting a grant extension from HUD.

Recipients must receive approval from ECHO, the Austin / Travis County CoC Collaborative Applicant, prior to requesting a significant change from HUD, including proposals for grant transfer, change in sub-recipients, change of project site, addition or elimination of eligible costs for a project, change in

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subpopulation, reduction in the number of units funded, and/or any budget changes greater than 10% of the budget line being reduced.

Recipients are strongly encouraged to participate in a Quality Review Plans (QRP), Corrective Action Plan (CAP), or HUD Technical Assistance (TA)-led assistance if mandated by the Austin / Travis County CoC and/or HUD. Recipients who are conditionally included for involuntary reallocation consideration may increase the likelihood of being fully reallocated if they chose not to participate in available TA opportunities. Please review the Reallocation Policy for more information.

Recipients are encouraged to provide Annual Performance Reports (APRs) to ECHO staff for review at least two (2) weeks prior to HUD submission in order to submit an accurate report of project performance.

Recipients are required to participate in the Quarterly Performance Scorecard Process. This participation enables the CoC to meet its responsibility to monitor and review CoC Programs for performance and compliance to ensure our community is progressing towards the goal of a high-performing CoC. This activity also enables recipients to identify project concerns and opportunities for growth.

Recipients must notify ECHO of receipt of a HUD monitoring notification or monitoring report within 48 hours.

If funded for SSO-CE, the CoC expects the Project Recipient to work with ECHO, the CoC Lead Agency, on training, to be provided at least annually, for CoC Projects and Coordinated Entry Staff regarding safety and best practices, e.g., trauma-informed survivor-centered, on safety and planning protocols in serving survivors of domestic violence.

## **Project Oversight**

Recipients of CoC Program Funding must have an accounting system compliant with 2 CFR 200.

It is required that all recipients of CoC Program Funding in the Austin / Travis County Continuum of Care develop and maintain an Internal Control environment that is in compliance with 2 CFR 200.303,

It is expected that where a recipient and sub-recipient relationship exists, there is a sub-recipient agreement in place which includes provisions for monitoring and oversight.

Recipients of CoC Program Funding are required by the Austin / Travis County CoC to develop, implement, and maintain an Internal Monitoring Policy covering awarded CoC Projects. Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.

## **CoC Engagement**

Recipients must participate in all trainings designated as mandatory that are conducted or sponsored by the Austin / Travis County CoC by having at least one representative staff member with direct

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involvement in operations and/or oversight of the project participate either via webinar or in-person, as required.

Recipients must participate in the local Point-in-Time Count (PIT) and Housing Inventory Counts (HIC) and submit data collected by the deadlines established by ECHO, the HMIS Lead Agency.

Recipients are expected to participate in CoC Committees and Workgroups.

Recipients are expected to work collaboratively with their community partners to end homelessness

Recipients are expected to create and maintain an effective homelessness response system, that achieves measurable progress toward making homelessness rare, brief, and where possible, one-time.

## **ECHO Expectation**

As the Collaborative Applicant for the Austin / Travis County CoC, ECHO must facilitate and manage the annual Continuum of Care Competition.

ECHO must complete the annual CoC Application to be submitted with the Consolidated Application.

ECHO must solicit input, create, and maintain CoC Governance Documents, Written Standards, and Policies & Procedures, as approved and directed by the Leadership Council, the CoC Board.

ECHO must facilitate CoC General Meetings, Committees, the CoC Board, and trainings.

ECHO must provide technical assistance and best practice recommendations to agencies operating within the CoC Geographic Area.

ECHO must provide guidance, recommendation, and training to the CoC Board, and ECHO must act in good faith to carry out decisions of the CoC Board as directed in the Austin / Travis County CoC MOU.

As the HMIS Lead Agency, ECHO must maintain and facilitate the Homeless Management Information System (HMIS).

ECHO provides training to new HMIS users and assists to maintain high data quality standards of the HMIS data.

ECHO reports HMIS data to HUD annually.

ECHO manages and facilitates the annual Point in Time Count and Housing Inventory Count, and ECHO analyses this data and provides it to HUD.