

To: Nonprofit Organizations Funded for Homeless Services in FY 2020-2021

From: Chuck Mottern, Homeless Services Funding Coordinator

CC: Barbie Robinson, Interim Executive Director  
Tina Rivera, Assistant Executive Director  
Felicity Gasser, Equity and Compliance Team Manager

Date: June 5, 2020

Subject: Carrying Participants over to a new Funding Sources for Rapid Re-Housing and Homelessness Prevention

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Funding Agreements for Homeless Services projects funded through HOME Sonoma County, allocates funding on a Fiscal Year basis. These one-year Funding Agreements contain budgets that often consist of dollars from multiple sources consisting of State, Federal, and/or Local funds. SCCDC policy allows for Rapid Re-Housing (RRH) and Homeless Prevention (HP) projects to provide financial support such as rental assistance, and utility assistance, to program participants for up to twenty-four months during any three-year period, a time frame greater than the one year Funding Agreement. The SCCDC recognizes that situations may arise where Funding Agreements and/or funding sources are ending despite participants requiring on-going service.

If a program participants requires on-going services beyond the end date of the Funding Agreement and/or when one funding source is exhausted during the same fiscal year, participants may be able to continue with services despite the changing funding source. Subrecipients may request to “carry over” those program participants to the period covered by the new funding source. This allowance can ensure the participant receives ongoing services to the extent that participants are eligible per the new funding source.

Potential changes in the funding levels, sources of funds, available dollars, or funding regulations may lead to fluctuations in the annual amount of public dollars available for homeless services. For this reason, rapid re-housing and homelessness prevention projects should not make guarantees of ongoing support past the end of the contract term.

#### Method for Requesting Carried Over Assistance

Prior to carrying over any program participants to receive services under a new funding source, the SCCDC must consult with the agency providing the funding source (e.g. HUD, HCD, etc.) to receive approval to fund this activity with its portion of the funds. To request program participants be carried over:

1. Subrecipients must inform the SCCDC of the number of program participants who will need on-going services past the Funding Agreement end date or upon exhaustion of a funding source no later than 30 days prior to the Funding Agreement end date or exhaustion of funds.

- a. Subrecipient will complete the SCCDC Form “Request to ‘Carry over’ Program Participants” and submit to the SCCDC Homeless Services Funding Coordinator.
2. The SCCDC will confirm with each agency providing the funding source whether or not the proposed activity is allowable and determine ways to ensure accurate reporting and performance tracking between the funding streams.
3. The SCCDC will notify the subrecipient if the agencies providing the funding sources agree to allow program participants to receive on-going services from their funding.

#### Documentation Criteria for Carried Over Assistance

If subrecipients will be carrying over program participants from one funding source to another funding source, the following requirements must be met:

1. The documentation of eligibility gathered at the intake evaluation must be available to all funding sources for which the program participant is receiving services. Subrecipients are required to maintain records of each program participant served in accordance with the ESG Interim Rule, 24 CFR 576.500(f). Code of Federal Regulations: <https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part576.xml#seqnum576.409>
2. Program records must show program participants did not have any time lapses in service when being carried over from one funding source to another;
3. If any funding source has additional or more restrictive eligibility requirements or limits to assistance, then the subrecipient must ensure they are in compliance with any additional criteria at the time the corresponding funds are used;
4. The assistance/funds must be accounted for and reported on separately for each funding source; and
5. Subrecipients must ensure that they are continuing to comply with HMIS participation and reporting requirements per 24 CFR 576.400(f) and the HMIS Requirement section of this document.

#### HMIS Requirements

Subrecipients will have a separate HMIS project for every funding source received (ESG, HHAP, etc.). Only program participants who receive services from that funding source are to be entered in to the corresponding HMIS project. This will ensure proper data and reporting of outcomes to that funding source. When program participants are being carried over to receive services from a different funding source:

1. Program participants must be exited from the previous HMIS project on the last date of funding for that project.
  - a. If the program participant is housed and will continue to be housed and receive RRH assistance, the exit destination should be ‘Rental by client, with RRH or equivalent subsidy’.

- b. If the program participant is not housed, the exit destination should be the program participant's current location.
2. The program participant will be entered in to the newly assigned HMIS project on the very next day following the exit in the previous HMIS project. There should not be any breaks in the timeline as the program participant is receiving on-going services.
  - a. The HMIS project name for each funding source can be found in the Scope of Work of the corresponding Funding Agreement.
3. If the program participant is housed upon entry into the new HMIS project, the subrecipient will enter the 'housing move-in date' as the same date as the start date into the new HMIS project, even if the move-in date is prior to the current start date in the new HMIS project.
  - a. Documentation of continued eligibility for the new HMIS project must be retained on file for the participant for monitoring purposes.
  - b. Housing move-in date must be completed for all clients who have moved into housing. Move-in means a lease arrangement has been made, the client has a key or entry ability to the unit and that the client has physically slept in the unit.
  - c. If the program participant has not been housed the 'housing move-in date' will be left blank and completed when the participant meets criteria as stated in 3b above.

**Request to 'Carry over' Program Participants**

Subrecipient Name \_\_\_\_\_

Date \_\_\_\_\_

Project Name \_\_\_\_\_

Current Funding Source \_\_\_\_\_

HMIS Project Name \_\_\_\_\_

Number of Participants needing on-going services \_\_\_\_\_

Date participants will be exited from current Project \_\_\_\_\_

By signing below, I certify an evaluation has been conducted and the participants that need on-going services continue to meet eligibility for services.

Staff Name \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

**For SCCDC Use**

New Funding Source \_\_\_\_\_

New HMIS Project Name \_\_\_\_\_

Number of Participants approved to continue with services through New Funding Source \_\_\_\_

Date Approved for New Project to begin \_\_\_\_\_

SCCDC Staff Approving Request \_\_\_\_\_