

COMPLIANCE GUIDANCE

BRIEF OVERVIEW OF THE COMPLIANCE VISIT

The purpose of the site visit is to verify compliance of the agency with the terms of the Grant Agreement(s), the Missouri Housing Trust Fund or Housing First Desk Guides and HUD regulations for the Emergency Solutions program or other agency restrictions, if required.

DOCUMENTATION REQUIREMENTS:

The Compliance Officer will need to examine client files, financial assistance, and administrative / operating expenses, to verify compliance with program rules and regulations. **All required documentation** should be assembled in an orderly fashion, in paper form, and available for review within 15 minutes of request in a private workspace. Agency staff directly involved with program operations should be available for questions.

Areas of particular concern:

- Missing or inadequate documentation of case management and housing stability goal plan.
- Missing or inadequate documentation of reason for homelessness.
- Missing proof of need for financial assistance, i.e., receipt, invoice, bill, etc.
- Missing proof of payment or cleared payment.
- Missing proper identification for all household members.
- Missing program consent form (s).
- Over income limit household.
- Intake application inadequate.
- Missing income documentation.
- Missing third party verification of income.
- Missing current rental lease.
- Missing recertification or not within required timeframe for program.
- Gross annual income calculation error.
- Income from assets calculation error.

PHYSICAL INSPECTION

ESG and MHTF compliance requires a physical inspection of all Emergency Shelter buildings. This inspection will follow HUD's Minimum Standards for Emergency Shelters [24 CFR part 576.403 (b)]. **Please notify all clients and/or staff of the inspection at least 24 hours prior to the site visit date.**

EXIT INTERVIEW

The Compliance Officer will discuss any observations made during the compliance visit with the agency staff. A formal written report letter of the compliance results will be prepared within **30 days** of the exit interview. The report will be directed to the agency contact listed in the contact form on file with MHDC.

REPORT LETTER

Once the report letter has been sent, a written response from the agency is **not** required unless otherwise noted in the letter, or the agency is placed "out of compliance." MHDC requires that agencies placed out of compliance submit a **Corrective Action Plan (CAP)**. The CAP should be a written response addressing each of the Compliance Officer's observations and/or findings in the letter within **30 days**. The CAP must also include indication of any corrective action taken or contemplated and a targeted specific date for completion. The agency will be notified once the CAP has been approved and the compliance status has been amended to "in compliance."

The Compliance Officer and MHDC appreciate your assistance and cooperation during the compliance visit. The reviews are performed by MHDC to assist management in running a successful program to assist clients with the need for permanent, decent, safe, and sanitary housing.

CONTACT INFORMATION

Should you have any questions, or if we can be of assistance please feel free to contact the Compliance Officer, Denise Hoss, Community Initiative Department, at 816-759-6642 or via e-mail at dhoss@mhdc.com.