SAMPLE HANDBOOK

Continuum of Care Program (CoC) Policies and Procedures

[Your organization's name]

Written from 24 CFR Part 578, checked November 10, 2026.

How to use this sample

Replace the bracketed name with your organization's. Change the job titles to the ones you use. Have the people who do the work read each section and correct anything that does not match how you operate. Then have your director or board approve it and sign the last page.

This is a sample, not legal advice. It follows the federal regulation. Your grant agreement and your funder's manual can add or tighten requirements, and they control where they differ.

Introduction

This handbook explains the policies and procedures our organization uses to manage Continuum of Care Program funds from the U.S. Department of Housing and Urban Development (HUD). The program is governed by 24 CFR Part 578 and by the federal grant rules in 2 CFR Part 200. In this handbook, "the Continuum" means our local Continuum of Care, the community group that plans homeless services in our area and sets written standards for projects like ours. "Participant" means a person or family assisted with these funds. Each section states our policy, lists the steps staff follow, and names the rules it rests on. Where a number comes from our grant agreement or from the Continuum's written standards, we say so and staff look it up there. The program director reviews this handbook at least once a year and whenever the rules or our grant agreement change.

What the program expects in writing

- Standard operating procedures for making sure Continuum of Care funds are used as the rules require (24 CFR 578.103(a))
- Written intake procedures for documenting chronic homelessness, including the order in which evidence is sought (24 CFR 578.103(a)(4))
- Written procedures that keep participant information, and the location of family violence projects and participant housing, confidential (24 CFR 578.103(b))
- Written program rules and a written termination process, given to each participant before assistance starts (24 CFR 578.91(b))
- A written conflict-of-interest policy and written standards of conduct for staff, officers and board members (24 CFR 578.95; 24 CFR 578.103(a)(12); 2 CFR 200.318(c)(1))
- Documented procurement procedures for buying goods and services with grant funds (2 CFR 200.318(a))
- Written procedures for requesting grant payments and for deciding whether a cost is allowable (2 CFR 200.302(b)(6) and (b)(7))
- A signed lease, sublease or occupancy agreement with every participant who lives in project housing (24 CFR 578.77(a))
- The local Continuum of Care's written standards and coordinated entry process, built into the project's own intake procedures (24 CFR 578.7(a)(8) and (a)(9); 24 CFR 578.23(c)(9) and (c)(10))
- The Continuum of Care's emergency transfer plan, the notice of rights and certification form, and lease language for survivors of domestic violence, dating violence, sexual assault or stalking (24 CFR 578.99(j); 24 CFR 5.2005)
- A written memorandum of understanding for services that a third party donates as match (24 CFR 578.73(c)(3))

1. Participant eligibility and documentation of homelessness

OUR POLICY

We serve only people who meet HUD's definition of homeless and any added rules for our project type. Permanent supportive housing serves people with a disability and families in which an adult or child has a disability. Where our project is dedicated to people who are chronically homeless, we document that status at intake using the order of evidence the regulation sets. We keep the proof in each participant file.

WHAT WE DO

1. The case manager checks at intake which part of the homeless definition applies to the person or family and records it in the file.
2. The case manager looks for evidence in this order: third-party documents first, staff observation second, and a signed statement from the person third.
3. The case manager writes down the steps taken to get third-party documents whenever the file relies on the person's own statement.
4. The case manager documents a disability, when the project requires one, with written verification from a licensed professional, written verification from the Social Security Administration, proof of a disability check, or a staff observation that is confirmed with one of these no later than 45 days after the application.
5. The case manager documents chronic homelessness by showing at least 12 months of living in a place not meant for people to live, a safe haven, or an emergency shelter, either in a row or over at least 4 separate occasions in the last 3 years.
6. The program director reviews each file for complete eligibility documents before the participant is enrolled.
7. The program director tracks how often chronic homelessness is documented by self-statement alone, because the regulation limits this to 3 months of the homeless period for at least 75 percent of the chronically homeless households served in an operating year.
8. The case manager records the reason whenever a person is found not eligible.

Rules this covers: 24 CFR 578.3; 24 CFR 578.37(a)(1)(i); 24 CFR 578.103(a)(3); 24 CFR 578.103(a)(4); 24 CFR 576.500(b)

2. Coordinated entry and the Continuum's written standards

OUR POLICY

We take referrals through the coordinated entry system that the Continuum runs. Coordinated entry is the shared intake and assessment process that decides who is referred to which project. We follow the Continuum's written standards for eligibility, for who is served first, and for how much rent a rapid re-housing participant pays. We do not keep a separate waiting list that goes around this system.

WHAT WE DO

1. The program director keeps a current copy of the Continuum's written standards and coordinated entry policies with this handbook.
2. The case manager accepts new participants only through a coordinated entry referral and keeps the referral in the file.

3. The case manager reports each opening to the coordinated entry lead in the way the Continuum requires.
4. The program director records the reason in writing whenever a referral is turned down and reports it to the coordinated entry lead.
5. The case manager applies the emergency transfer priority in the Continuum's standards when a survivor of violence needs to move for safety.
6. The program director uses the victim service providers' coordinated entry system instead, if our organization is a victim service provider and has chosen that option.
7. The program director compares this handbook with the Continuum's standards each time the Continuum updates them.

Rules this covers: 24 CFR 578.7(a)(8); 24 CFR 578.7(a)(9); 24 CFR 578.23(c)(9); 24 CFR 578.23(c)(10); 24 CFR 578.37(a)(1)(ii)(A)

3. Eligible costs and budget lines

OUR POLICY

We charge the grant only for costs that are eligible under the regulation and that fit a budget line HUD approved in our grant agreement. The budget lines are leasing, rental assistance, supportive services, operating costs, the Homeless Management Information System (HMIS), and project administration. We track each line separately and do not mix them. We do not charge participants program fees.

WHAT WE DO

1. The finance manager sets up a separate account code for each approved budget line of each grant.
2. The program director approves each cost and marks the budget line it belongs to before it is paid.
3. The finance manager checks each cost against the list of eligible costs for that budget line in the regulation.
4. The finance manager holds project administration, including any indirect costs charged to it, to the amount in the grant agreement, which the regulation caps at 10 percent of the grant.
5. The finance manager makes sure rental assistance is not combined with leasing funds or with operating funds in the same unit or building.
6. The program director confirms with HUD or the recipient who administers rental assistance, because the regulation names a State, a local government, or a public housing agency as the administrator.
7. The program director asks for a grant amendment before shifting more than 10 percent from one approved eligible activity to another, and documents any smaller change in the grant file.
8. The finance manager records rent and occupancy charges collected from participants as program income and spends them only on eligible activities.

Rules this covers: 24 CFR 578.37; 24 CFR 578.49; 24 CFR 578.51; 24 CFR 578.53; 24 CFR 578.55; 24 CFR 578.57; 24 CFR 578.59; 24 CFR 578.63; 24 CFR 578.87(c); 24 CFR 578.87(d); 24 CFR 578.97; 24 CFR 578.105

4. Rent, leases and housing inspections

OUR POLICY

Every participant living in project housing has a signed lease, sublease or occupancy agreement. We pay rent only for units that pass inspection and where the rent is reasonable compared with similar units that are not assisted. For units we lease with leasing funds, rent also stays at or below HUD's Fair Market Rent (FMR), the rent level HUD publishes each year for each area. We calculate each participant's share of rent from documented income.

WHAT WE DO

1. The case manager inspects each unit in person against HUD's housing standards before any assistance is paid, and keeps the inspection report.
2. The case manager confirms that a failed unit was repaired within 30 days of the first inspection before assistance starts, and inspects every unit again at least once a year.
3. The case manager compares the rent with rents for similar unassisted units, looking at location, size, type, quality and amenities, and puts the comparison in the file.
4. The finance manager checks that rent paid from leasing funds for an individual unit is not more than the current FMR.
5. The case manager verifies income with source documents at entry and at least once a year for participants receiving rental assistance, and again when income changes.
6. The case manager calculates the participant's rent contribution under section 3(a)(1) of the U.S. Housing Act of 1937, as the regulation requires for rental assistance, or under the Continuum's written standards for rapid re-housing.
7. The finance manager makes sure any occupancy charge is not more than the highest of 30 percent of monthly adjusted income, 10 percent of monthly income, or the part of a welfare payment set aside for housing.
8. The program director confirms that each permanent housing lease runs at least one year and that each transitional housing lease or agreement runs at least one month.

Rules this covers: 24 CFR 578.3; 24 CFR 578.49(b); 24 CFR 578.51(g); 24 CFR 578.51(l); 24 CFR 578.75(b); 24 CFR 578.77; 24 CFR 578.103(a)(7); 24 CFR 578.103(a)(9); 24 CFR 5.609; 24 CFR 5.611(a); 24 CFR 5.703

5. Match

OUR POLICY

We match all grant funds, except leasing funds, with at least 25 percent in cash or in-kind contributions from other sources. Match is spent on, or made up of, things that would be eligible costs under the program. We record match as it is received, not at the end of the year.

WHAT WE DO

1. The finance manager calculates the match owed for each grant as 25 percent of all budget lines except leasing.
2. The finance manager confirms that each cash source is allowed to be used as match under the rules for that source.
3. The program director signs a memorandum of understanding with each third party that donates services before the grant agreement is signed, naming the service, the profession of the people

providing it, and the hourly cost.

4. The program director collects records of the service hours actually provided under each memorandum during the grant.
5. The finance manager values donated services at rates our organization pays for similar work, or at local market rates if we have no similar position.
6. The finance manager keeps a match log that shows the source, the use, the grant, and the fiscal year for each contribution, and how each in-kind value was set.
7. The finance manager checks that no contribution is counted as match for more than one federal award.

Rules this covers: 24 CFR 578.73; 24 CFR 578.103(a)(11); 2 CFR 200.306(b)

6. Financial management, drawdowns and timekeeping

OUR POLICY

We keep accounting records that show, for each grant, what was awarded, what was spent, and what it was spent on. We draw grant funds only for eligible costs, and at least once per quarter, as the regulation requires of recipients. Staff time charged to the grant is based on records of the work actually done, not on budget estimates.

WHAT WE DO

1. The finance manager records every grant cost by grant and budget line and keeps the invoice, lease or payroll record that supports it.
2. The finance manager compares spending with the approved budget for each grant every month and gives the report to the program director.
3. The finance manager prepares each draw from costs already recorded and supported, and the executive director approves it before it is submitted.
4. The finance manager draws funds at least once per quarter and keeps the time between receiving funds and paying them out as short as possible.
5. The finance manager, when we pass funds to a subrecipient, pays each approvable request no later than 45 days after receiving it.
6. Each employee who works on more than one grant or activity completes a time record showing all of their paid time and how it was split, and the supervisor signs it.
7. The finance manager charges salaries to the grant from the signed time records and corrects any charge that was first based on an estimate.
8. The executive director arranges a single audit for any fiscal year in which our organization spends $1,000,000 or more in federal awards.

Rules this covers: 24 CFR 578.85(c); 24 CFR 578.99(e); 24 CFR 578.99(g); 2 CFR 200.302; 2 CFR 200.303; 2 CFR 200.305(b); 2 CFR 200.403; 2 CFR 200.430(g); 2 CFR 200.501(a)

7. Procurement and conflicts of interest

OUR POLICY

We buy goods and services through fair and open competition and keep a record of how each purchase was made. No employee, officer, board member or agent takes part in a decision in which they, their family, or their business ties have a financial interest, and none of them gains a financial benefit from the project during their service or for one year after it. Staff do not decide rent reasonableness or inspect units in property that our organization or a related entity owns.

WHAT WE DO

1. The finance manager follows our written purchasing procedures, which set dollar levels for small purchases, price quotes, and formal bids within the limits of the federal rules.
2. The finance manager keeps a file for each purchase that shows the method used, the vendors considered, why the vendor was chosen, and how the price was judged.
3. The finance manager checks that a vendor or subrecipient is not suspended or debarred from federal work before a contract is signed.
4. Each employee and board member signs a conflict-of-interest disclosure when they start and once a year after that, and the executive director keeps the forms.
5. The board chair has any member with a conflict step out of the discussion and the vote, and the minutes record it.
6. The program director assigns an outside party to do rent reasonableness checks and inspections for any unit our organization or a related entity owns.
7. The executive director asks HUD in writing, through the recipient, for an exception before going ahead with any arrangement the conflict rules would otherwise bar.

Rules this covers: 24 CFR 578.95; 24 CFR 578.103(a)(12); 24 CFR 578.103(a)(17); 2 CFR 200.214; 2 CFR 200.318; 2 CFR 200.319; 2 CFR 200.320

8. Supportive services, participant involvement and termination of assistance

OUR POLICY

We offer supportive services that help participants get and keep housing, and we review each participant's service needs at least once a year. People who are or were homeless have a voice in our decisions: at least one sits on our board or equivalent policy body, and we involve participants in running the project where we can. We end assistance only for violations of program rules or conditions of occupancy, and only through a formal process. In permanent supportive housing we end assistance only in the most severe cases.

WHAT WE DO

1. The case manager gives each participant a written copy of the program rules and the termination process before assistance starts, and keeps a signed receipt.
2. The case manager assesses each participant's service needs at least once a year, adjusts the service plan, and records both in the file.
3. The case manager meets with each rapid re-housing participant at least once a month and re-evaluates their need for assistance at least once a year.

4. The program director names one staff person to make sure children in families we serve are enrolled in school and connected to services.
5. The executive director makes sure at least one person who is or was homeless serves on the board or equivalent policy body, and keeps a record that shows it.
6. The program director sends a written notice that clearly states the reasons before any termination.
7. The executive director, or another person who did not make or approve the decision and does not report to the person who did, reviews the decision and hears the participant's written or spoken objections.
8. The program director sends the participant prompt written notice of the final decision and files all termination records.

Rules this covers: 24 CFR 578.23(c)(4)(iv); 24 CFR 578.37(a)(1)(ii); 24 CFR 578.53(a); 24 CFR 578.75(e); 24 CFR 578.75(g); 24 CFR 578.91; 24 CFR 578.103(a)(8); 24 CFR 578.103(a)(13)

9. Nondiscrimination, fair housing, faith-based rules and VAWA

OUR POLICY

We follow federal fair housing and civil rights laws and do not turn a family away because of the age or gender of a child under 18. Any explicitly religious activity is kept separate from grant-funded activity, is voluntary, and is never a condition of help. In our housing projects we follow the Violence Against Women Act (VAWA): no one is denied housing, evicted, or cut off from assistance because they are a survivor of domestic violence, dating violence, sexual assault or stalking.

WHAT WE DO

1. The program director markets the project to eligible people who are least likely to apply without special outreach, and keeps copies of the outreach materials.
2. The case manager gives each participant information on their rights under fair housing and civil rights laws.
3. The program director handles requests for accessibility changes and other disability-related accommodations and records the outcome.
4. The case manager gives the VAWA notice of occupancy rights and the certification form when a person is denied housing, when they are admitted, and with any notice of eviction or termination.
5. The program director makes sure each lease, sublease, occupancy agreement and landlord contract includes the required VAWA protections.
6. The case manager follows the Continuum's emergency transfer plan when a survivor asks to move for safety, and records the request and the outcome.
7. The case manager keeps anything a survivor shares in strict confidence and does not enter it into any shared database.
8. The program director keeps records that show any religious activities are offered separately in time or place from grant-funded services.

Rules this covers: 24 CFR 578.87(b); 24 CFR 578.93; 24 CFR 578.99(j); 24 CFR 578.103(a)(6); 24 CFR 578.103(a)(14); 24 CFR 578.103(a)(15); 24 CFR 5.105(a); 24 CFR 5.109; 24 CFR 5.2005; 24 CFR 5.2007(c)

10. HMIS, privacy and confidentiality

OUR POLICY

We enter participant data into the Homeless Management Information System (HMIS) that the Continuum has chosen, and we follow the Continuum's privacy, security and data quality plans. If our organization is a victim service provider, we use a comparable database that meets HUD's HMIS requirements instead. We keep participant information secure and do not make public the address of any family violence project or any participant's home.

WHAT WE DO

1. The case manager explains to each participant at intake how their information is collected, used and shared.
2. The case manager enters intake, annual update and exit data within the time limits in the Continuum's data quality plan.
3. The program director reviews data quality reports each month and has errors corrected.
4. The program director gives each staff member their own login, limits access to those who need it, and removes access the day a person leaves.
5. The case manager keeps paper files in locked storage and does not send identifying information by unsecured email or text.
6. The executive director approves in writing any release of the address of a family violence project that our organization operates.
7. The finance manager charges HMIS costs to the grant only if they are on the regulation's list of eligible HMIS costs and in our approved budget.

Rules this covers: 24 CFR 578.7(b); 24 CFR 578.23(c)(4); 24 CFR 578.57; 24 CFR 578.103(b)

11. Records, reporting and monitoring

OUR POLICY

We keep records that show we met each program requirement, and we keep them for at least 5 years. Participant records are kept for 5 years after all funds from the grant that served the participant have been spent. If grant funds paid to buy, build or rehabilitate a site, we keep those records until 15 years after the site was first occupied or used by participants. We report to HUD on time and give HUD, its Inspector General, and the Comptroller General access to our records.

WHAT WE DO

1. The program director keeps a file checklist that lists each record the regulation names, including eligibility, income, services, inspections, match, and conflict-of-interest records.
2. The program director reviews a sample of participant files each quarter against the checklist and has gaps fixed.
3. The finance manager labels each closed grant file with the date it can be destroyed and holds any file that is under audit, claim or legal action until the matter is resolved.
4. The program director prepares the Annual Performance Report (APR) from HMIS data and submits all required reports no later than 90 days after the end of the grant term.
5. The finance manager checks the financial figures in each report against the accounting records before it is submitted.

6 The program director monitors each subrecipient at least once a year when our organization is the recipient, and keeps the findings and corrective actions on file.
7 The executive director answers any monitoring finding in writing by the date given and reports the corrective action to the board.
8 The program director documents in the grant file any project change that does not need a grant amendment.

Rules this covers: 24 CFR 578.23(c)(8); 24 CFR 578.103(a); 24 CFR 578.103(c); 24 CFR 578.103(d); 24 CFR 578.103(e); 24 CFR 578.105(c); 24 CFR 578.107; 24 CFR 578.109(b); 2 CFR 200.334

Adoption

This handbook was reviewed and adopted by our organization on the date below. We review it once a year and whenever the grant agreement or the regulation changes.

Adopted by: _____ Title: _____

Signature: _____ Date: _____

Sources

- 24 CFR Part 578: The Continuum of Care Program rule: eligible costs, program requirements, recordkeeping and grant administration. https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578
- 24 CFR 576.500: The Emergency Solutions Grants recordkeeping section; paragraph (b) lists the evidence of homeless status that the Continuum of Care rule adopts. https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576/subpart-F/section-576.500
- 24 CFR Part 5: HUD-wide requirements: nondiscrimination (5.105), faith-based organizations (5.109), income (5.609, 5.611), housing standards (5.703) and VAWA protections (subpart L). https://www.ecfr.gov/current/title-24/subtitle-A/part-5
- 2 CFR Part 200: The federal grant rules on financial management, procurement, cost principles, record retention and audits. https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200
- HUD Continuum of Care Program page: HUD's program page, with notices and guidance for recipients and subrecipients. https://www.hud.gov/hud-partners/community-coc