



# Oops We Did It Again: Compliance Trends and How to Fix Them

# Agenda

- **What is Compliance Monitoring?**
- **Benefits of Compliance**
- **Compliance Trend Issues + Resources**
- **Questions + Discussion**

# Key Takeaways

- 1 Identify possible compliance concerns**
- 2 Get access to resources**
- 3 Feel comfortable implementing these resources**



**What do you think of when  
you hear the words  
“compliance monitoring”?**

# What is Compliance Monitoring?

- Monitoring is part of a comprehensive **risk management strategy** to protect federally provided funds, IHCDA and the subrecipient, as well as their assets.
- It is a **requirement of each award agreement**.
- It is **federally mandated**.

# What is Compliance Monitoring?

- The monitoring process allows IHCDa to **meet its own legal requirements** with HUD and to ensure our subrecipients meet theirs.
- The monitoring process is **NOT designed to be punitive**, but rather to identify issues that have already occurred and provide guidance and support to ensure they don't pop up again.

**What do you think is going  
well at your agency in  
relation to compliance?**

# Why should you care about Compliance?

- Being compliant with programmatic requirements is a **term of your grant agreement** with IHCDA
- Ensure that the **people you serve are protected** and getting quality services
- You can have **confidence that your program is strong**



# What does good Compliance look like?

- Claims
- HMIS
- Client Files
- Manuals/resources
- Analyst communication

What do you think is not  
going well at your agency  
in relation to compliance?

# Compliance Trend Issues

- 1 Lead-based Paint (LBP) Requirements
- 2 Income Eligibility Requirements + Calculations
- 3 Client-File Organization
- 4 Data Timeliness

# LBP Requirement Trends

- **Lead Based Paint Exemption Forms** have been missing (required for all programs providing housing)
- **"Protect Your Family from Lead in Your Home"** pamphlet should be provided to all families receiving housing assistance.
- **Lead Based Paint Disclosure Forms** have been missing (required for programs providing housing with children under 6 years old **AND** the structure was built before 1978)

## IMPORTANT!

### Lead From Paint, Dust, and Soil in and Around Your Home Can Be Dangerous if Not Managed Properly

- Children under 6 years old are most at risk for lead poisoning in your home.
- Lead exposure can harm young children and babies even before they are born.
- Homes, schools, and child care facilities built before 1978 are likely to contain lead-based paint.
- Even children who seem healthy may have dangerous levels of lead in their bodies.
- Disturbing surfaces with lead-based paint or removing lead-based paint improperly can increase the danger to your family.
- People can get lead into their bodies by breathing or swallowing lead dust, or by eating soil or paint chips containing lead.
- People have many options for reducing lead hazards. Generally, lead-based paint that is in good condition is not a hazard (see page 10).



## Protect Your Family From Lead in Your Home



March 2021

# LBP Requirement Resources

- **Federal Regulation:**
  - General LBP Requirements for all Programs - 24 CFR Part 35 Subpart B
  - Exemptions- 24 CFR 35.115
- **HUD Exchange:**
  - General Lead-Based Paint Info
  - Toolkit for Tenant-base Rental Assistance

# LBP Requirement Resources

- **LBP Training:**
  - <https://attendee.gotowebinar.com/recording/7569524463726316716>
- **Forms:**
  - [LBP Exemption Form](#)
  - [LBP Disclosure Form](#)
- **LBP Flowchart** to be rolled out soon

**What other LBP  
resources would be  
supportive for you?**



# Income Eligibility Trends

- **Income Calculation Worksheets** need to be filled out (even if zero income)
- **Income Source Documents** are required for each household (paystubs, benefits letters, etc.)
- If client has no income, a **Zero Income Affidavit** is required.

# Income Eligibility Resources

Income Requirements by Program			
ESG	CoC	HOPWA	TANF
<b>HP</b> Household must be <b>at or below 30% of AMI</b>  <b>RRH + Shelter-</b> <b>No income limit</b>	<b>No income limit</b>	Household must be <b>at or below 80% of AMI</b>	Household must be <b>at or below 200% of the Federal Poverty Level</b>

# Income Eligibility Resources

- **Federal Regulation:**
  - What is Annual Income - 24 CFR 5.609
  - What is Adjusted Income? - 24 CFR 5.611
- **Income Calculation Training**
- **Zero Income Affidavit Form**
- **Attend today's Breakout Session:**
  - "Money, Money, Money... the Confusing World of Client Income" at 2:25pm

# Income Quiz!

# TRUE OR FALSE?

**Annual Gross Income** is the total income calculated based upon earnings or planned/anticipated income throughout the year before tax and withholdings?

**TRUE!**

# WHICH IS INCLUDED IN AN INCOME CALCULATION?

- ☒ • Pay from Door Dash
- ☒ • Seasonal income from Amazon
- ☐ • Student Financial Aid assistance
- ☒ • Child support payment
- ☒ • Social Security disability payment
- ☐ • SNAP benefits

# WHAT ARE THE INCOME REQUIREMENTS FOR THE FOLLOWING PROGRAMS?

Income Requirements by Program			
ESG	CoC	HOPWA	TANF
<p><b>HP</b> Household must be <b>at or below 30% of AMI</b></p> <p><b>RRH + Shelter-</b> <b>No income limit</b></p>	<p><b>No income limit</b></p>	<p>Household must be <b>at or below 80% of AMI</b></p>	<p>Household must be <b>at or below 200% of the Federal Poverty Level</b></p>

# Client File Retention

- Not collecting **correct** information and/or not keeping any or all files.
- Confidentiality + VAWA Considerations.





# Client File Resources

## IHCDA: HMIS ClientTrack and DV ClientTrack

- Store and Organize your client files here!

HMIS

DV Client  
Track

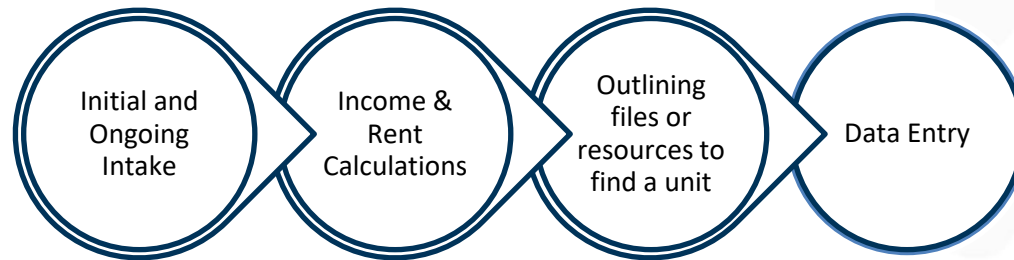
# Client File Resources

Considerations  
for Case  
Management

Dedicated  
Workflow

Example:  
TANF  
Checklist

Example:  
Manuals



# Client Files – Record Retention Requirements



**What client file  
organization methods  
work well for your  
agency?**

# Data Timeliness Trends

- Clients are being **entered into HMIS weeks or months** after they have been served
- Clients are **never exited** from the program in HMIS



# Data Timeliness Resources and Tips

Examine your agency's data entry process



Have a designated person complete the data entry



Enter and update data weekly – set a calendar reminder if it's needed

# Data Timeliness Resources and Tips

## Run HMIS Reports Quarterly

- Find and correct potential data errors sooner
- CAPER Submission

# Data Timeliness Resources

HMIS How-To-  
Guides



IHCDA: HMIS  
ClientTrack and DV  
ClientTrack



# Data Timeliness Quiz

# TRUE OR FALSE?

**How many days** after initial client intake and/or services and client discharge should data be entered into HMIS or DV Client Track?

**5 CALENDAR DAYS!**

# Review

- 1 All units receiving assistance through an IHCDA grant need an **LBP Exemption Form** on file.
- 2 **Income Calculation Worksheets** or **Zero Income Affidavit** should be in each client file.
- 3 Review your program manual for **required client files** and **abide by the retention requirement**.
- 4 Data Timeliness means entering data **within 5 days** of intake/discharge/services.

# Key Takeaways

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- 3 Feel comfortable implementing these resources



# Questions?