# NDCHP & ND-500 CoC: Policies and Procedures

## Introduction
- Mission Statement
- Core Values
- Purpose

## NDCHP
- Statement of Purpose
- Meetings
  - Regular meetings
  - Special Meetings
  - Notice of Meeting
  - Procedure
- Board of Directors
  - Numbers
  - Board of Directors
  - Term of Office
  - Quorum
  - Election
  - Vacancies
  - Absence
- Officers and Duties
  - Officers
- Membership
- Amendments

## Continuum of Care
- Continuum of Care Structure
- Organization
  - Purpose
  - Responsibilities
- Continuum of Care Membership
  - Steering Committee Membership
  - Committee Members
  - Steering Committee Meetings:

## HMIS

## NOFA Process and Procedures
- Ranking Committee
- Documentation

## Grant Management Capacity
Duty of Key Employees/Contractors and Board Members
  Employees and Contractors
  Board Members
Financial Management Policies and Procedures
  Financial Management Systems
    Accounting/Financial Software
      Farmcheck:
      HUD Line of Credit Control System (eLOCCS)
      ESG/NDHG Request for Funds Form
  Internal Controls
    Grant and budget Establishment
    Financial Policies
      Monthly Expenditure Invoice
      Reimbursements
        Drawdown, eLOCKS Process, and Reconciliation
    Grant Administration
      Tracking Grant Income and Expenditures
      Grant Extensions and Renewals
      Grant Amendments
      Obligation and De-Obligation of Funds
      Grant Closeout
      Verification of time cards
      Program Income
    Document Control and Reporting
      Transparency
      Reporting responsibilities
    Preventing Fraud and Abuse of Funds
      Code of Conduct
      Conflict of Interest
    Records of Proceedings:
    Acceptance of Gratuities
    Code of Conduct
      Prohibition Against Discrimination Sexual Harassment
      Confidentiality
      Equal opportunity and inclusion policy

Procurement Policies and Procedures
  Code of Conduct
  Violations
Introduction

Mission Statement

The North Dakota Coalition for Homeless People will work with all partners and stakeholders to lead the effort to end homelessness through coordination, education and advocacy across North Dakota. NDCHP is dedicated to reaching functional zero through the use of evidence based best practices.

Core Values

Our core values represent who we are. They describe our intended state of being. They are so integral to our being that we would not abandon them. The Coalition seeks to attract members who share these values:

**RESPECT**  We will treat and consider all people as we want to be treated and Considered.

**COMPASSION**  We will treat all people with empathy.

**INTEGRITY**  We will do what is ethical and right. Our actions will match our Words.

**EMPOWERMENT**  We will trust people to make decisions and carry them out.

**DEDICATION**  We are committed to our mission and we will relentlessly pursue It.
**EQUALITY**  We are committed to consistently value the equal rights and freedoms for everyone we serve.

**DIGNITY**  We will work to protect and enhance the dignity and self-respect of every person we serve.

## Purpose

This manual is a blueprint detailing how NDCHP works to achieve our mission statement and uphold our core values in the work we do.

This is the procedural authority for the NDCHP and supersedes any previously authorized procedures. This manual is to work in coalition with any and all existing HUD policies and procedures and is subject to change, the most updated policies and procedures can be found at the NDCHP website. Should any area within this manual conflict with the aforementioned policies and procedures, this manual will suspend the existing policy until remedied.

## NDCHP

### Statement of Purpose

The North Dakota Coalition for Homeless People Inc. (the Coalition) is a group of individuals and organizations who have come together to advocate, coordinate and optimize services for homeless men, women, and families in ND.

The official name of this organization is the North Dakota Coalition for Homeless People, INC.

### Meetings

**Regular meetings**

Regular meetings of the Board of Directors shall be held at least quarterly prior to, and at the designated place of, the regular Coalition meeting.

Regular meetings of the Membership shall be held quarterly at any designated place within the State of North Dakota
Special Meetings

Special meetings of the Board of Directors may be called by the president or by a majority of the board.

Special meetings of the membership may be called by a majority of members if the Board of Directors fails to call a special meeting. The business transacted at a special meeting is limited to the purposes stated in the notice of the meeting.

Notice of Meeting

Written notice starting the place, day and hour of the meeting and in case of a special meeting, the purpose or purposes for which the meeting is called, shall be sent not less than five nor more than forty-five days before the date of the meeting and posted on the Coalition webpage.

Procedure

All meetings shall be conducted according to Robert’s Rule of Order.

Board of Directors

Numbers

The management of the affairs of this organization shall be conducted by a board of not less than nine directors all of whom are a member of the NDCHP.

Board of Directors

The Board shall consist of the four (4) officers of the board, the immediate past president, and a minimum of four (4) members at large, one of which should be a current or previous client.

Term of Office

The term for each director shall be a period of two years after which each member may be elected for two additional two-year terms. Directors shall assume their office at the beginning of the fiscal year.

Quorum

A majority of the Board members shall constitute a quorum for the transaction of business at any meeting of the Board of Directors.
Election
Election of directors shall be conducted of and by the membership at the fall quarterly membership meeting.

Vacancies
Any vacancy occurring in the board of directors shall be filled by the affirmative vote of a quorum of the remaining board members.

Absence
Absence of a board member form three successive Board meetings, for which no sufficient reason is presented, shall, after due consultation, be considered equivalent to resignation and the place of the board members so absenting himself/herself shall be considered vacant.

Officers and Duties

Officers
The officers of the Board of Director are a Chair, Vice Chair, Secretary and Treasurer. They shall be elected by and from the board of directors.

a) Chair: The Chair presides at all meetings of the Board of Directors and membership meetings. The Chair is an ex-officio members of all committees. The Chair, or Chair designee, will serve as the Coalition representative to national organizations dealing with homelessness.

b) Vice Chair: The Vice Chair shall have all the powers and perform all the duties of the Chair in the Chair’s absence. The Vice Chair shall perform such additional duties as are delegated by the Chair.

c) Secretary: The Secretary is responsible for keeping full minutes of all board of directors meetings and meetings of the membership including the record of attendance. The Secretary sees that notices are sent for all regular and special meetings of the board of directors and the membership.

d) Treasurer: The Treasurer shall have all powers and duties allowed by law.

Membership
A member of NDCHP needs to believe in and be committed to the mission and the vision of the Coalition. One vote is entitled to each member. A member can be any of the following:

a) Nonprofit,
b) For-profit,
c) Government organization, or
d) Individual
Payment of membership dues is required. The amount of the membership dues will be determined by the Board of Directors. Membership dues are due and payable by January 1 or each year.

Amendments

These policies and procedures may be altered, amended or repealed and new bylaws may be adopted by a majority of the Board of Directors at any regular or special meeting.

In the event that a meeting cannot be called due to time restraints policies may be put temporarily into place by a majority vote of the Board of Directors.

- Written notification of all temporary policy changes must be published online and communicated to all members.

Continuum of Care

Continuum of Care Structure

Under S. 896 HEARTH Act of 2009 (24 CFR 578) The Continuum of Care (herein, CoC) is the group composed of representatives of relevant organizations that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment for; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless or at risk of homelessness persons for a specific geographic area.

Organization

The North Dakota-500 Statewide Continuum of Care is governed by the CoC Steering Committee. This committee will be appointed by the Board of Directors of the North Dakota Coalition for Homeless People, Inc. (herein, NDCHP). The NDCHP Board will focus on inclusion of all types, including but not limited to; geographic, minority standing, disability, sexual orientation, and gender.

Purpose

The Steering Committee serves as the HUD designated primary decision making group and
oversight board of the North Dakota Statewide Continuum of Care. As the oversight committee of the CoC, and its members, the Steering Committee will:

1. Ensure that the CoC is meeting all responsibilities assigned to it by HUD regulations;
2. Represent the relevant organizations and projects serving homeless subpopulations;
3. Support persons experiencing homelessness in their movement from homelessness to economic stability and affordable permanent housing within a supportive community;
4. Ensure that the CoC is inclusive of all needs of the North Dakota Statewide homeless population, including the special service and housing needs of homeless subpopulations;
5. Facilitate responses to issues and concerns that affect the agencies funded by the CoC that are beyond those addressed in the annual CoC application process.

Responsibilities

As the designated governing body of the CoC for the geographic area, the Steering Committee works with the CoC Collaborative Applicant (North Dakota Coalition for Homeless People) to fulfill three major duties (per Federal Interim Rule 24 CFR 578):

1. Operate the CoC, which must;
   a. Hold meetings of the full membership, with published agendas, quarterly;
   b. Make an invitation for new members to join publicly available within the geographic area at least annually;
   c. Adopt and follow a written process to select Steering Committee members to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC membership at least once every 5 years;
   d. Appoint committees, subcommittees, or workgroups as may be deemed necessary;
   e. In consultation with the CoC Collaborative Applicant, develop, follow, and update annually a CoC governance charter;
   f. In consultation with the CoC Collaborative Applicant and the HMIS Lead, develop, follow, and update annually all procedures and policies needed to comply with CoC requirements as prescribed by HUD; and a code of conduct and recusal process for the NDCHP Board, Steering Committee, its chair(s), any person acting on behalf of the Steering Committee, and the Scoring and Ranking

NDCHP & ND-500 CoC: Policies and Procedures
Committee;

9. Consult with recipients and subrecipients of CoC funding to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers;

h. Evaluate outcomes of projects funded under the North Dakota Emergency Solutions Grants program (hereinafter referred to as “ESG”) and the CoC program, and report to HUD;

i. In consultation with the Collaborative Applicant, the HMIS Lead, CARES board, and recipients of ESG funds, establish and operate a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.
   i. CARES policies and procedures can be found in appendix one

j. In consultation with recipients of ESG funds within the geographic area, establish and consistently follow written standards for providing assistance. At a minimum, these written standards must include:
   i. Policies and procedures for evaluating individuals’ and families’ eligibility for CoC assistance;
   ii. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
   iii. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
   iv. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
   v. If/when the CoC is designated a high-performing community, policies and procedures for determining and prioritizing which eligible individuals and families will receive Homelessness Prevention Assistance.

2. Designate and oversee a Homeless Management Information System (HMIS):
   a. Designate a single HMIS for the geographic area;
   b. Designate an eligible applicant to manage the CoC’s HMIS, which will be known as the HMIS Lead;
   c. Review, revise, and approve a privacy plan, security plan, and data quality plan

NDCHP & ND-500 CoC: Policies and Procedures
for the HMIS.

d. Ensure consistent participation of recipients and subrecipients of CoC and ESG funding in the HMIS;

e. Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

3. Continuum of Care Planning: The CoC must develop a plan that includes:

a. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system will encompass the following:
   i. Outreach, engagement, and assessment;
   ii. Shelter, housing, and supportive services; and
   iii. Prevention strategies.

b. Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:
   i. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.
   ii. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.
   iii. Annual Housing Inventory Count
   iv. Other requirements established by HUD by Notice.

c. Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

d. Providing information required to complete the Consolidated Plan(s) within the CoC’s geographic area;

e. Consulting with state and local government ESG program recipients for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients.

*This Charter and any applicable appendices may be altered, amended, or repealed and replaced by an affirmative vote of a simple majority of the members present at any meeting of the Board of Directors of NDCHP & ND-500 CoC: Policies and Procedures
the North Dakota Coalition for Homeless People either at its initiation or at the request of the Steering Committee, provided written notice of the proposed amendment or amendments shall be provided to the NDCHP board member at least five (5) days in advance of the meeting.

Continuum of Care Membership

The membership of the Continuum of Care is defined as those persons and organizations participating in the work of the CoC through committee or workgroup service, planning, other relevant stakeholders; or those who are experiencing homelessness (24CFR Subpart B 578.5) who sign an annual membership agreement committing to regular participation and representation at all CoC meetings.

Steering Committee Membership

Committee Members

1. Nomination: The Steering Committee shall be solicited from and nominated by the CoC membership and appointed by the Board of Directors of the North Dakota Coalition for Homeless People. The members should be comprised of representatives from;
   a. Each of the eight (8) planning regions within the state;
   b. Three (3) additional at-large members appointed by the NDCHP Board of Directors, including:
      i. One (1) homeless or formerly homeless member,
      ii. One member of the NDCHP Board of Directors,
      iii. One (1) member at-large.
   c. The NDCHP Board of Directors shall strive for statewide balance and diversity in the makeup of the Steering Committee.
   d. Non-voting advisory members will include;
      i. Executive Director,
      ii. CoC Coordinator,
      iii. North Dakota State Government staff concerning state homeless programs.

2. Officers: The Steering Committee shall, as soon as all members have been appointed, promptly elect a chairperson, a vice chairperson, and a secretary to cover the following
duties:

a. Chairperson:
   i. preside at meetings of the Committee and the CoC.

b. Vice-Chairperson(s)
   i. perform the duties of the Chairperson in the case of the death or absence
      of the Chairperson, or the inability from any cause to act.
      1. In the absence of a presiding officer, the chair may shall appoint a
         member as acting chair.
   ii. Develop an agenda for each meeting with the NDCHP Executive Director,
        CoC Coordinator.

c. Secretary:
   i. Record and report the minutes of meetings of the Committee members
      and the full membership of the CoC.
   ii. Work in conjunction with the NDCHP Executive Director and CoC
       Coordinator to provide financial reports.

3. Terms: All members of the CoC Steering Committee will be subject to the following term
   limits and policies;
   a. Members shall serve a term of two (2) years ending in December.
      i. Terms will be staggered so half of the voting members are appointed in
         one year and half are appointed in the year thereafter.
   b. Members are eligible for re-election to up to two (2) terms for a total of four (4)
      years.
      i. After completion of two (2) consecutive terms, a person may be elected to
         a new term after one (1) year absence.

3. Vacancies: Vacancies on the Committee shall be filled, as soon as reasonably possible,
   by appointment of the NDCHP Board of Directors.
   a. Persons appointed to fill an unexpired term shall serve out the unexpired term of
      his or her predecessor
   b. They are eligible to stand for election for two (2) additional full terms.

4. Attendance: Attendance at meetings is strongly encouraged. If unable to join in person
   electronic allowed at the discretion of the chair.
   a. If a member is absent for three successive Committee meetings; or consistently
      fails to attend or participate they may be removed from the committee by:
      i. A majority vote of the CoC Steering committee
ii. A unanimous vote of the NDCHP Board of Directors

iii. As stated under “CoC Membership”, the composition of the Steering Committee will be consistent with the direction of Federal law through the S. 896 HEARTH Act of 2009 (24 CFR 578).

Steering Committee Meetings:

1. Steering Committee meetings will be subject to the following policies and procedures:
   a. Meetings may be called by either the Chair or Vice Chair;
      i. Notice of time and location of all meetings shall be delivered personally or by email to all members at least four days prior to the meeting; or by US Postal Service at least 6 business days prior to the meeting;
   b. Meetings shall be held at least semi-annually with the location determined by the Chair and CoC Coordinator;
      i. When possible, a virtual/electronic option for attendance shall be available;
   c. Meeting will be conducted following Robert’s Rules of Order.

5. All votes conducted by the CoC Steering committee will be subject to the following policies and procedures:
   a. Members shall have one (1) vote.
   b. NDCHP staff and North Dakota State Government staff concerning state homeless programs shall not vote, but may advise.
   c. In the instance of a tie, the vote of the Chair or acting Chair will be voided to break the tie.
   d. Electronic voting will be permissible at the discretion of the Chair for the purpose of easing the challenge of making leadership decisions between meetings or when timing or travel is unrealistic for one or more members.
      i. The voting period and required response date shall be prominently posed in the request for vote.
   e. A quorum must be reached for the transaction of any business by the Committee.
      i. A simple majority of the non-vacant seats on the Committee will determine the presents of a quorum.
6. Sub-Committees/Groups: Ad Hoc working groups, task forces, and sub-committees may be created as needed by the Steering Committee. The Committee may request assistance from the NDCHP staff or Board of Directors to fill seats in these groups for specific research or tasks.

7. Additional Responsibilities: Additional to the aforementioned duties and responsibilities, the CoC Steering committee will be responsible for:
   a. Providing regular reports on the status of the CoC program to the NDCHP Board of Directors, NDCHP membership, and CoC membership.
   b. Provide evaluative feedback to the NDCHP Board of Directors concerning the performance of the NDCHP Executive Director and CoC Coordinator.

HMIS

HMIS policies and procedures will be reviewed and approved annually by the Board of Directors to insure that they are in compliance with all applicable regulations.

These policies and procedures will be available to all HMIS users by the HMIS Lead.

NOFA Process and Procedures

The ND CoC Steering Committee will be responsible for overseeing and executing all HUD required elements of the annual NOFA process.

The Committee will create all policies and procedures in the most transparent way as possible ensuring that all members of the CoC are made aware of the funding opportunities available to them.

Ranking Committee

In order to prevent conflict of interest the CoC Steering Committee will follow strict guidelines when appointing the members of the ranking committee:

1) The ranking committee will be composed of no fewer than five voting members; and no more than ten. Members will include, when possible:
   a) One member from each CoC region
b) A DV service provider representative

c) One NDCHP representative (non-voting)

d) CoC Coordinator (non-voting)

2) Individual associated with an agency that currently receives, or is applying for HUD funding are prohibited from serving on the ranking committee

   a) An exception is made for the non-voting members listed above

**Documentation**

In accordance with the data documentation retention policy, all records, documents, meeting minutes, and applications relevant to the NOFA process will be maintained and made available to the authorized agents.

**Grant Management Capacity**

NDCHP turns to its board of directors and hired assistance to oversee and monitor CoC, State, and outside grants.

**Duty of Key Employees/Contractors and Board Members**

**Employees and Contractors**

The below positions will be filled following the procurement policies set forth by NDCHP in compliance with HUD regulations.

1) The Continue of Care Coordinator: report to the designated board member(s) on the progress and completion of the following tasks:

   a) Setting up grants
   b) Preparing all drawdowns of funds in eLOCCS
   c) Financial Reports
   d) Grant close out
   e) Annual Performance reports
   f) Financial Management of Grants and Program funds
g) Completing APRs in e-snaps  
h) Submitting annual data to HUD for the Annual Homeless Assessment Report  
i) Preparing and overseeing the NOFA competition  
j) Applying for funding  
k) All other board assigned duties  

2) HMIS Lead: report to the designated board member(s) on the progress and completion of the following tasks:  

3) Bookkeepers: report to the designated board member(s) on the progress and completion of the following tasks:  

Board Members  

The board members will assign specific grant management tasks to individual members based on skills, interests, and need.  

Once the tasks have been assigned all agents of NDCHP and the CoC will be informed and chains of command and communication will be outlined.  

Financial Management Policies and Procedures  

Financial Management Systems  

Accounting/Financial Software  

Farmcheck:  

NDCHP utilizes the quickbooks accounting system. Quickbooks delivers accurate, transparent, and efficient financial operations. This system is operated through a contract with Farmcheck. It is the responsibility of Farmcheck to fulfill all responsibilities outlined under the Duty of Key Employees/Contractor section of this manual.
HUD Line of Credit Control System (eLOCCS)

NDCHP uses eLOCCS to drawdown funds for CoC grants. eLOCCS is the official system used by HUD to distribute and track the payments of CoC grants funds to grant recipients. Grantees request program funds through an automated online system that is maintained by eLOCCS.

The NDCHP Board Chair will appoint two board members to be the official users of the eLOCCS system. These users will be responsible for overseeing all the internal controls related to eLOCCS.

NDCHP will not request advanced funding from HUD. All drawdown requests are on a reimbursement basis only.

ESG/NDHG Request for Funds Form

NDCHP utilizes the ESG/NDHG Request for Funds form (SFN 52681) to drawdown funds for all State grants. SFN 52681 is the form used by the State of North Dakota to distribute and track the payment of State grant funds to grant recipients. Grantees request program funds by completing the form and submitting it to the Division of Community Services by emailing it to both dfaber@nd.gov and mhalone@nd.gov

The NDCHP Board of Directors will appoint one board member to be the official signer of the ESG/NDHG Request for Funds Report. These users will be responsible for overseeing all the internal controls related to ESG and NDHG.

NDCHP will not request advanced funding from the State of ND. All drawdown requests are on a reimbursement basis only.

Internal Controls

It is the policy of NDCHP and the ND-500 CoC that no funds be spent without following the proper procedures. Additionally, it is the responsibility of each individual in the procedure to
verify that all necessary steps have been taken to insure that all legal and fiscal responsibility are met by NDCHP and the CoC.

Grant and budget Establishment

It is the role and responsibility of NDCHP to ensure that all Grants be handled according to NDCHP policy, Federal Policy, and State Policy.

1) Grants: Once a grant is approved by HUD, the grant is set up in the board approved accounting software. All grant awards, obligation, un-obligated balances, assets, liabilities, expenditures, and program income are tracked within the accounting system.

   a) Details of the grant will be shared with all involved staff. Those details include:
      i. type,
      ii. name,
      iii. amount,
      iv. award date,
      v. awarding agency,
      vi. grant period,
      vii. matching requirements,
      viii. description,
      ix. special condition/restrictions,
      x. program codes, and
      xi. drawdown information.

   b. Grant Budget: upon receiving the grant award letter a budget for the grant will be set following the below procedure:
      i. An initial budget will be prepared by the CoC Coordinator
      ii. A two thirds vote by the ND CoC Steering Committee is necessary for the approval of each grant budget.
      iii. All grant budgets will be drafted with the overall CoC and NDHCP budget, set by the Board of Directors, in mind.
      iv. All expenses paid for by federal and match funds will be in compliance with the eligible costs found in regulation 24 CFR 578
c. Internal Grant Record: in compliance with the NDCHP record policy all internal grant records will include:
   i. grant award letter,
   ii. obligations,
   iii. un-obligated balances,
   iv. expenditures, and
   v. program income associated with the grant.

Financial Policies

The handling of all debits and credits will follow a strict process in order to insure that all funds are used appropriately and with fiscal responsibility in pursuit of fulfilling the mission of the NDCHP. The amend policy for the following can be found in the bylaws of NDCHP.

Monthly Expenditure Invoice

Each month the appropriate staff member will prepare an invoice to send the bookkeepers detailing all expenditures from the month. To insure the consistency and accuracy of the finances this invoice will first be submitted to the appointed board member. This individuals is responsible for:
   a) comparing the invoice to the program budget;
   b) verifying that all source documentation is in order; and
   c) Providing approval for the invoices to be paid

Once the CoC Coordinator receives electronic approval from the aforementioned board member the invoice will be sent to the bookkeepers for the processing of checks and accounting.

The bookkeepers will provide the staff member with the checks and a financial report. The report will include the monthly expenditures broken down by source of funding. Each check will then need signatures from two board approved signers.
   a) It is the responsibility of both signers to ensure that the proper procedure has been followed and all the necessary paperwork is in order.
Reimbursements

NDCHP does not request advanced funding from HUD. All drawdown requests are on a reimbursement basis only.

Drawdown, eLOCKS Process, and Reconciliation

Drawdowns: NDCHP will follow the drawdown requirements outlined in 24 CFR Part 578.85.

a) All drawdowns from HUD or other funding agencies are prepared and entered in eLOCCS by the designated board member to reflect the monthly finance report.

i) Drawdowns may not be processed by the individual who prepares the monthly financial statements or the CoC Coordinator.

b) Per federal requirements of 24 CFR Part 578.85, NDCHP will draw down funds at least once per quarter of the program year, after eligible activities commence.

eLOCCS: The Board Chair is the Approving Official for the eLOCCS system. The Chair assigns and approves access. The two approved users will work together to creating the Line of Credit Control System (LOCCS) Account. The following forms must be completed:

a) LOCCS Voice Response Access Authorization, Form HUD (27054)
b) Direct Deposit Sign-up Form (SF-1199A)

Accessing eLOCCS After all forms are received by the Federal Program Office a User name and Password is sent by the LOCCS Security Office. Once the Grantee has returned all the required forms, a letter is sent containing the computer generated User ID.

Reconciliation: All balances, drawdowns and closeouts in eLOCCS are reconciled with the bookkeeping agency before submission.

Grant Administration

Grant Administration is needed to make sure that all Federal, State, and private grants are handled in a fiscally responsible manner. The following section will outline the different elements of the necessary grant administration and the individual(s) who is carrying it out.
Tracking Grant Income and Expenditures

The approved board member and CoC Coordinator will provide the NDCHP Board and CoC Steering Committee with a monthly Financial Report detailing:

a) debits,
b) credits, and
c) grant distribution

The purpose of this report is to provide a tool that the Board can use to monitor grant expenditures and make the adjustments necessary to ensure that the work of the CoC is being carried out properly with the mission of the Board in mind.

Grant Extensions and Renewals

The CoC Coordinator is responsible for submitting an annual request for renewal of the CoC grant as part of the larger CoC NOFA process. A copy of the submitted application will be made available to all board members.

Grant Amendments

Any significant grant changes require written HUD approval. In the case that an amendment is required, the ND CoC 500 will submit a written request to HUD and obtain a written grant amendment.

a) All grant amendments will be made available for board members.

Obligation and De-Obligation of Funds

When HUD and the applicant execute a grant agreement HUD will obligate the funds to cover the approved grant. The recipient is expected to carry out the proposed activities in the application. However, if the recipient does not carry out the proposed activities or if the grant amount is not used in a timely manner, HUD may de-obligate all or a portion of the funds, in accordance with 24 CFR 578.85 and 578.107

a) In the case that funds are de-obligated the CoC Coordinator will report the action taken by HUD to the board
Grant Closeout

HUD formally closes out grants when a project is completed. HUD uses the same process when projects are terminated, are no longer funded by HUD, or when the recipients discontinue a project.

The financial manager notifies the authorized board member when a contract is complete and can be closed out in the accounting system and eLOCCS. Once all expenditures have been processed and all revenue has been received, grant closeout begins. Notification is promptly delivered to HUD by the financial manager requesting the grant be closed.

HUD’s grant closeout requirements are described at 24 CFR 578.109 and 2 CFR Part 200.343 and in other procedures established by HUD. NDCHP must submit all reports required by HUD no later than 90 days from the date of the end of the project’s grant term. Obligations remaining at closeout must be covered by the terms of the close-out agreement.

The closeout agreement, prepared by HUD in conjunction with NDCHP, will include the following:

a) Identification of closeout costs or contingent liabilities subject to payment with CoC Program funds after the closeout agreement is signed;

b) Identification of unused grant funds to be de-obligated by HUD;

c) Identification of any program income on deposit in financial institutes;

d) Description of the recipient's responsibility after closeout for compliance with all program requirements related to the use of program income and remaining CoC Program funds; use of real property, use of personal property purchased with CoC Program funds, and compliance with requirements governing project income received subsequent to grant closeout; and

e) other provisions appropriated to any special circumstances of the grant closeout.

Verification of time cards

All employees will submit their timecards to their direct supervisor for verification and approval weekly.
a) In the situation where there is no direct supervisor the timecards will be sent the approved board member quarterly for review and approval

b) All contract workers will submit their time cards to the approved board member on a quarterly basis for review

Program Income

Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient,

a) Program income will be used for eligible activities in accordance with the requirements.

b) Costs incident of the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to gain funds.

1) Due date: Due dates for all program fees and incomes will be set and enforced by the board.
   a) If an organization needs to seek an extension for any reason they must submit a written request to the Chair of the Board to be reviewed and voted on by the board.
      i) The board has the right to request any additional documentation or verification regarding the request

2) Amount: All program income fees and amounts will be set by the board and approved by membership.

3) Eligible costs: Program income will be subject to HUD eligible costs requirements

4) Indirect Costs: If indirect costs are to be charged against the grant, NDCHP will ensure that costs are allocated only as forth in federal code, and are only permitted at the approval of the board.

Document Control and Reporting

Transparency

All documents pertaining to NDCHP will be available to the board members at anytime, excluding documents that contain private client information as defined in HUD requirements. Documents will also be made available to awarding agencies upon request.
1) Physical Documentation: Financial, policy, and operational documents of NDCHP and ND CoC 500 will be stored for seven years in a secure location as designated by the board of directors.

2) Digital documentation: Financial, policy, and operational documents of NDCHP and ND CoC 500 will be stored in a digitally accessible format for seven years.
   a) After seven years the digital records will be archived in an external hard drive, stored with the paper documents.

3) Disposing of records: Before any physical records are disposed of the board must be informed
   a) Physical documents containing personal or financial information will be disposed of in a secure manner

Reporting responsibilities

The board of directors is responsible for assigning a qualified individual to complete all required reports. This individual will be required to inform the board upon the submission of each report.

Preventing Fraud and Abuse of Funds

Code of Conduct

In order to ensure the proper disbursement of grant funds, NDCHP complies with HUD rules and regulations, as well as other applicable federal regulations such as 2 CFR Part 200. NDCHP particularly emphasizes mitigation of fraud, abuse and mismanagement related to accounting, procurement and accountability, NDCHP assesses all program policies and procedures from an anti-fraud, waste, and abuse perspective.

Anyone who has concerns about potential fraud or abuse should report them to the board of directors to be further investigated and resolved.
Conflict of Interest

It is the policy of NDCHP that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by federal or state funds if a real or apparent conflict of interest would result from such participation.

This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

Procedures for Addressing the Conflict of Interest

1) An interested person may make a presentation at the Board or Executive Committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

2) The Chairperson of the Board or Executive Committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

3) After exercising due diligence, the Board or Executive Committee shall determine whether NDCHP can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

4) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board or Executive Committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in NDCHPs best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

Violations of the Conflicts of Interest Policy

1) If the Board or Executive Committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
2) If, after hearing the member’s response and after making further investigation as warranted by the circumstances, the Board or Executive Committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Records of Proceedings:

The minutes of the Board and all committees with board delegated powers shall contain:

a) The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board’s or Executive Committee’s decision as to whether a conflict of interest in fact existed.

b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Acceptance of Gratuities

NDCHP employees are prohibited by law from soliciting or accepting gratuities, favors, or anything of monetary value from funding applicants, contractors, or parties to sub-agreements.

Code of Conduct

The NDCHP has adopted the following Code of Conduct that all Board members, employees, and contracted employees agree to adhere to all policies and procedures as outlined by this document

Prohibition Against Discrimination Sexual Harassment

The NDCHP strives to maintain a workplace that is free from illegal discrimination and harassment. While all forms of harassment are prohibited, it is the organization’s policy to emphasize that sexual harassment is specifically prohibited. Any official agent of NDCHP who
engages in discriminatory or harassing conduct towards is subject to removal from his or her position.

Complaints alleging misconduct will be investigated promptly and as confidentially as possible by a task force of the Boards appointing.

Confidentiality

Official agents of NDCHP are reminded that confidential financial, personnel and other matters concerning the organization, donors, staff or clients/consumers may be included in materials or discussed from time to time. Official agents of NDCHP should not disclose such confidential information to anyone without prior authorization of the board.

Equal opportunity and inclusion policy

It always has been and continues to be NDCHP’s policy that all agents of NDCHP should be able to enjoy an environment free from all forms of unlawful discrimination. All decisions regarding recruiting, hiring, promotion, assignment, training, termination, and other terms and conditions of employment will be made without unlawful discrimination on the basis of race, color, national origin, ancestry, sex, sexual orientation, gender identity or expression, religion, age, pregnancy, disability, work-related injury, covered veteran status, political ideology, genetic information, marital status, or any other factor that the law protects from employment discrimination.

Additionally, NDCHP prohibits unlawful harassment of its employees, applicants, or independent contractors in any form. Complaints of unlawful discrimination or harassment should be reported to the board for full investigation.

In cases where investigation confirms the allegations, appropriate corrective action will be taken, regardless of whether the inappropriate conduct rises to the level of any violation of law.

No employee will suffer retaliation for reporting, in good faith, any violation of Company policy or unlawful discrimination, harassment, or retaliation.
Procurement Policies and Procedures

The policy set forth in this document establishes standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment.

Code of Conduct

A Code of Conduct shall govern the performance, behavior and actions of the Organization, including Board members, employees, directors, volunteers, or agents who are engaged in any aspect of procurement, including – but not limited to – purchasing goods and services; awarding contracts and grants; or the administration and supervision of contracts.

1) No employee, officer, director, volunteer or agent of the Organization shall participate in the selection, award or administration of a bid or contract supported by Federal funds if a conflict of interest is real or apparent to a reasonable person.
   a) Conflicts of interest may arise when any employee, officer, director, volunteer or agent of the Organization has a financial, family or any other beneficial interest in the vendor firm selected or considered for an award.

2) No employee, officer, director, volunteer or agent of the Organization shall do business with, award contracts to, or show favoritism toward a member of his/her immediate family, spouse’s family or to any company, vendor or concern who either employs or has any relationship to a family member; or award a contract or bid which violates the spirit or intent of Federal, State and local procurement laws and policies established to maximize free and open competition among qualified vendors.

3) The Organization’s employees, officers, directors, volunteers or agents shall neither solicit nor accept gratuities, gifts, consulting fees, trips, favors or anything having a monetary value in excess of $50 from a vendor, potential vendor, or from the family or employees of a vendor, potential vendor or bidder; or from any party to a sub-agreement or ancillary contract.
Violations

As permitted by law, rule, policy or regulation, the Organization shall pursue appropriate legal, administrative or disciplinary action against an employee, officer, director, volunteer, vendor or vendor’s agent who is alleged to have committed, has been convicted of or pled no contest to a procurement related infraction.

a) If said person has been convicted, disciplined or pled no contest to a procurement violation, said person shall be removed from any further responsibility or involvement with grants management, procurement actions or bids, consistent with State or Federal policy.

Procurement Options

All procurement transactions will be conducted to provide – to the maximum extent possible – free and open competition among suppliers. The Organization must begin with an analysis of the need for the procurement, to avoid the purchase of unnecessary items.

1) **Procurement by small purchase procedures (under $10,000):** Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold

   a) If small purchase procurements are used, price or rate quotations will be obtained from an adequate number of qualified sources.
   
   b) For procurements under $1,000: the decision may be made by the grantee or project manager,
   
   c) For procurements from $1,000 to $9,999, prior approval must be obtained from the Advisory Committee,

2) **Procurement by sealed bids (over $9,999):** Bids are publicly solicited and a firm-fixed-price contract is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price.

   a) The sealed bid method is the preferred method for procuring construction, if the conditions in 85.36(d)(2)(i) apply.

NDCHP & ND-500 CoC: Policies and Procedures
b) In order for sealed bidding to be feasible, the following conditions should be present:
   i) A complete, adequate, and realistic specification or purchase description is available;
   ii) Two or more responsible bidders are willing and able to compete effectively for the business; and
   iii) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

   c) If sealed bids are used, the following requirements apply:
   i) The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;
   ii) The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;
   iii) All bids will be publicly opened at the time and place prescribed in the invitation for bids;
   iv) A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
   v) Any or all bids may be rejected if there is a sound documented reason.

3) **Procurement by competitive proposals (over $9,999):** The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost reimbursement type contract is awarded.
   a) It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:
i) Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;

ii) Proposals will be solicited from an adequate number of qualified sources;

iii) Grantees and sub grantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;

iv) Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered;

4) **Procurement by noncompetitive proposals (over $9,999):** is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.

   a) Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies:

      i) The item is available only from a single source;

      ii) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.

      iii) The awarding agency authorizes noncompetitive proposals; or

      iv) After solicitation of a number of sources, competition is determined inadequate.

   b) Grantees and sub grantees may be required to submit the proposed procurement to the awarding agency for pre-award review and should consult with the awarding agency prior to procurement

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**Additional Procurement Considerations**

**Small and Minority Firms Clause**

The grantee and subgrantee will take all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when possible.

   a) Affirmative steps shall include:
i) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

ii) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

iii) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women's business enterprises;

iv) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises;

v) Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and

vi) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

Contract Cost And Price

Grantee and sub grantees must perform a cost or price analysis in connection with every procurement action including contract modifications.

   a) The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, grantees must make independent estimates before receiving bids or proposals.

All procurement transactions will be conducted to provide – to the maximum extent possible – free and open competition among suppliers. The Organization must begin with an analysis of the need for the procurement, to avoid the purchase of unnecessary items. Services, products, and all other expenses incurred by NDCHP and the CoC will be subject to the following procurement solicitation best practices based on their cost level;

   a) For procurements under $1,000: the decision may be made by the grantee or project manager,

   b) For procurements from $1,000 to $9,999, prior approval may be obtained from the Advisory Committee,

   c) For Procurements over $9,999, the must follow the below solicitation and competition guidelines:
i) The purchaser must identify and clearly specify standards for the goods or services desired, and seek competitive offers where possible to obtain the best possible quality at the best possible price.

ii) Bids must be sought for goods and services exceeding $10,000,

1) competitive bids will be utilized and requests for these bids will be written in a way that does not restrict competition.

(a) (A clear and accurate description of the technical requirements for the material, product or service to be procured; all requirements which offers must fulfill; and all other factors to be used in evaluating bids or proposals.)

Procurement Files

Grantees and sub grantees must make available, upon request of the awarding agency, technical specifications on proposed procurements where the awarding agency believes such review is needed to ensure that the item and/or service specified is the one being proposed for purchase. In the pursuit of this, complete procurement files must be kept in accordance with the documentation policy. All procurement files must include the following:

a) Basis for contractor selection.

b) Proof of an effort to utilize small and minority owned businesses

c) Proof that the organization:

   i) Executed price sampling for small purchases;

   ii) Selected the method of procurement and the type of contract to be used;

   iii) Determined which bids or proposals to accept and which to reject; and

   iv) Determined the basis for the contract cost or price.

Section 6: Accounting Principles and Audit Requirements

NDCHP complies with requirements set forth by OMB 2 CFR Part 200 Uniform Administrative requirements, cost principles and audit requirements
Audits and Reviews

NDCHP is subject to the single Audit Act. A single audit encompasses the review of compliance with program requirements and the proper expenditure of funds by an independent certified public accountant.

NDCHP will conduct an annual audit or review of all financial findings.

All findings and associated evidence are reported directly from the independent Certified Public Accountant to the CoC Coordinator and the Board. If the Audit includes findings NDCHP complete a corrective action plan. The corrective action plan is added to the audit/review file of the year.

Appendix A: Cares Policies and Procedures