



## COMMUNITY PROGRAMS COMPLIANCE GUIDANCE

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The purpose of the compliance visit or desk review is to verify agency compliance with the terms of the Grant Agreement(s), Desk Guide(s), and State or Federal Guidelines in place for the Missouri Housing Trust Fund (MHTF), Missouri Housing Innovation Program (MoHIP), Shelter Operations Support (SOS), and Disaster programs (DRF & MHTF-DR).

### DOCUMENTATION REQUIREMENTS

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The Compliance Officer will examine client files, financial assistance, and administrative/operating expenses, to verify compliance with program rules and regulations. During the site visit, agency staff must produce a Clients Served Report from the HMIS or comparable database system (MoHIP, MHTF), Demographic Reports (DRF), or Quarterly Reports (SOS). **All required grant documentation** should be assembled in an orderly fashion, in paper form and be available for review within 15 minutes of the request. The agency should provide a private workspace and staff directly involved with program operations and accounting should be available for questions. In the event of a desk audit please refer to the Desk Review Procedure in the program's desk guide compliance section.

Common errors that could result in "out of compliance" status include:

- Missing or inadequate documentation of case management and housing stability goal plan
- Missing or inadequate documentation of housing status
- Missing proof of costs 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)
- Missing or inadequate intake forms
- Missing income documentation for members of a household over 18
- Missing third party verification of income
- Missing current rental lease
- Missing recertification or documentation not within required timeframe for program
- Gross annual income calculation error
- Income from assets calculation error
- Household over income limit

### PHYSICAL INSPECTION (*MHTF Construction and Rehabilitation Grantees Only*)

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MHTF Construction/Rehabilitation grantees are required to have a physical on-site inspection within one (1) calendar year of the project being approved. The Compliance Officer will inspect the building exterior, building systems, parking lots/driveways, playground, lawn, and any common areas on the property as well as 20 percent of randomly selected individual client sleeping rooms, as applicable to the property. All properties will be inspected at a minimum of once every three years following the initial on-site inspection during the LURA's effective period.

### EXIT INTERVIEW

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The Compliance Officer will discuss any observations made during the compliance visit with agency staff present or in the event of a desk review, an email exit interview will be sent. A formal report of the compliance outcomes will be prepared and sent to the agency within **30 days** of the exit interview. The report will be sent to the agency contact listed in the site contact form on file with MHDC.

### COMPLIANCE REPORT

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Once the compliance report has been sent to the agency a written response is **not** required unless otherwise noted, or the agency is placed "out of compliance." MHDC requires that any agency 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 sent to MHDC 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 by MHDC and the compliance status has been amended to "in compliance". Funds will not be released to any agency found out of compliance until they submit a CAP and it is approved by MHDC.

The Compliance Officer and MHDC appreciate your assistance and cooperation during the compliance visit. MHDC hopes to help each agency run a successful program that will assist clients with decent, safe and sanitary housing.