

System Performance Monitoring Plan



Policies & Procedures Manual

Prepared by the Coalition of Homeless Services
Providers

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Contents

Purpose	3
Introduction	3
Process	4
Timeline	5
Subrecipients	5
Notification and Preparation	6
Methods	6
Agency Evaluation Tool.....	6
On-Site Client File Review.....	7
Self-Assessment.....	7
Summary Report.....	8
Timeframe and Process for Cohorts	8
Results	8
Technical Assistance	8
Remedial Action and Sanctions	9
Remedial Actions.....	9
Sanctions by HUD.....	10
Communication Strategy	10
Evaluation	11
Sharing Monitoring Results	11
Appendices	12
Glossary of Common Terms.....	13
Proposed Monitoring Criteria.....	13
Reference of Codes, Regulations, and Requirements	15

2019 CoC Program Monitoring Process Policy

I. Purpose:

The primary purpose of the Monterey and San Benito Counties Continuum of Care (CoC), represented by the Coalition of Homeless Services Providers (CHSP), is to carry out the responsibilities of a CoC as defined by the CoC Program Interim Rule (24 CFR 578).

A significant part of these responsibilities is the creation and implementation of a System Performance Monitoring Plan for monitoring the performance of recipients and subrecipients (agencies) of CoC program funding. This plan strives to improve outcomes for persons experiencing homelessness who are receiving assistance through these projects and achieving the Leadership Council's vision for everyone in the CoC region to have a safe, stable place to call home.

CHSP must consult with agencies of CoC program funding operating within the boundaries of the CoC to:

- A. Establish performance targets;
- B. Monitor agency performance;
- C. Evaluate outcomes; and
- D. Act against poor performers

The System Performance Monitoring Plan will provide the necessary structure to comply with regulatory requirements as well as advance the CoC's efforts to end homelessness across the region.

II. Introduction:

The goals of Monterey and San Benito counties' Continuum of Care Program Monitoring plan is to:

- A. Proactively assist projects with efforts to comply with Department of Housing and Urban Development (HUD) regulations. Although CoC program monitoring does not exhaustively address all HUD program requirements, this process addresses areas that HUD prioritizes for allocation of funds.
- B. Provide guidance and Technical Assistance (TA) opportunities to CoC-Funded projects.

- C. Address and help resolve performance concerns related to policies, procedures, and outcomes.
- D. Ensure there is consistency in how agencies/projects implement their CoC-Funded programs.

III. Process:

All CoC funded programs are subject to the most current regulations established by HUD. Additional requirements may also exist for these programs based on local priorities and goals. Funded programs are responsible for reviewing, understanding and complying with these regulations and requirements. This monitoring process was developed to fall within those regulations and reflect best practices for the Monterey and San Benito County's CoC.

There are four components of the monitoring process:

- A. The agency evaluation tool;
- B. On-site client file review;
- C. Self-assessment; and
- D. HMIS security check.

The agency evaluation tool and self-assessment are completed at the agency level. When multiple projects are monitored at an agency, the on-site client file review is the only component that occurs independently for each project. Monitoring processes will be conducted on a strict timetable, included here in this policy manual.

Since the use of HMIS is a requirement for CoC funded programs, the HMIS security checks will also occur during site visits. There will be one security check for each agency to be conducted by the designated HMIS staff person. There is a link to the requirements for HMIS security compliance, which can be found in the references. The security plan and compliance checklist can also be found on the CHSP website under the HMIS Admin-ART documents web page.

Entities and Team Members Involved with the Monitoring Process: Monitoring will primarily be conducted by a team of 2-3 staff members from CHSP:

- A. 1-2 CoC Program Staff: To review self-assessments and agency evaluation tool and perform on-site client file reviews; and
- B. 1 HMIS Staff: To evaluate questions regarding HMIS data entry during the on-site client file reviews.

Additionally, as the lead entity for CoC programs in Monterey and San Benito, Leadership Council members will also be aware of the agencies/programs that are monitored and, as necessary, contribute to feedback or support related to CoC procedures.

IV. Timeline:

Monitoring will begin in December and continue through November. CHSP will divide the monitored agencies into three cohorts. Agencies will be monitored during each cohort, the number of which will vary depending on the number of projects within each agency. Those agencies within a cohort will have the same due dates and deadlines, but on-site client file reviews will occur on separate dates. The cohorts are divided as follows:

Cohort 1: March to April

Cohort 2: April to May

Cohort 3: May to June

V. Subrecipients:

If a project that has a sub-recipient is selected for monitoring, CHSP will work directly with the selected agency and that agency will be responsible for gathering information and responding to CHSP on behalf of the sub-recipient.

If the selected agency determines that a subrecipient is not complying with a program requirement or its subrecipient agreement; the agency must take action through the following process:

- A. The agency will document the subrecipient non-compliance with the CoC Program regulations and develop corrective actions designed to prevent a continuation of the deficiency, to mitigate to the extent possible, its adverse effects, and to prevent its recurrence. This report will be submitted to CHSP.
- B. CHSP will convene a meeting to review program performance and compliance to the CoC program guidelines and present the proposed corrective actions. The agency and subrecipient will attend the meeting to support the development of a schedule with milestones necessary to implement the corrective actions. The outcome of this review will be a Technical Assistance Plan that assigns responsibilities for carrying out the remedial actions and corresponding dates for evaluating activities.

VI. Notification and Preparation:

Agencies will be notified a minimum of two weeks prior to the beginning of the cohort. Therefore, cohort 1 will be notified by February 17, cohort 2 will be notified by March 18, and cohort 3 will be notified by April 15.

CHSP will post the following materials to the monitoring page of their website so agencies may prepare in advance of their scheduled time frame:

- A. CoC Monitoring Tool which includes the agency evaluation PDF form, self-assessment PDF form and on-site client file review PDF form;
- B. Monitoring process instruction manual;
- C. A sample summary report; and
- D. A sample TA plan.

VII. Methods:

CHSP will utilize four monitoring components:

- A. The agency evaluation tool;
- B. On-site client file review; and
- C. Self-assessment
- D. Summary Report

If more than one project is selected from a single agency, the agency will only be asked to complete one self-assessment and one agency evaluation, but an on-site client file review will be conducted for each project.

- A. Agency Evaluation Tool:** The Agency Evaluation Tool is used to evaluate policies and procedures in place at the agency to ensure compliance with HUD regulations and local priorities. Because there are many acceptable ways to operate a program, for each question the agency/project provides a description of how they comply, followed by uploading supporting documents/evidence or identifying whether supporting evidence may be demonstrated best through an on-site visit or staff interviews. The criteria prioritized in the Agency Evaluation Tool are listed in more detail in the appendix section of this policy manual.

- B. On-Site Client File Review:** The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services. A cross reference between the physical files and HMIS database is performed for areas such as: consent, enrollment, move-in dates, housing status, and income.

The file review lasts one-two business day(s) and occurs on-site at the project's facility. The on-site client file review is completed for 3-5 participants. When selecting participant files, CHSP will choose a cross-section of files that will include participants who have recently exited, who have recently enrolled, and who have long periods of program enrollment. CHSP will send the agency the selected list of HMIS Client IDs 1-2 days before the review so staff may retrieve the files.

At the beginning of the review, CHSP will ask staff to demonstrate how forms and documentation are organized within the file structure. However, agency staff do not need to remain with the monitors the whole time. CHSP will highlight preliminary results at the end of the file review.

There will also be time designated during this day for a staff member to review additional on-site documents related to the agency audit and/or interview staff, if necessary. The on-site client file review PDF form is available for review and preparation purposes on the monitoring page of CHSP's website.

- C. Self-Assessment:** The self-assessment is an opportunity for the project to reflect on performance and challenges related to practices that are priorities in our community. It is an opportunity for the agency to self-evaluate their project and discuss areas in which they would like to request technical assistance (TA).

Topics covered in the self-assessment include homeless and chronic homeless definitions and recordkeeping, coordinated entry, enrollment, housing, eviction prevention, data collection, staff development, service provision, and grant management.

One week prior to site visit agencies should complete and submit self-assessment to CHSP. Question types include narratives, checkboxes, Yes/No, and rating scales. The self-assessment also provides an opportunity for the project to identify additional TA needs related to performance on the intent to renew (NOFA) or the CHSP monitoring tool.

D. Summary Report: The summary report is a culmination of the results from both the agency evaluation and the on-site client file review. The report will consist of specific instances where the agency is out of compliance with reference to the code that is being violated. Also included in the summary report will be recommendations for corrective action. Those recommendations can be used to inform the Technical Assistance (TA) Plan.

VIII. Timeframe and Process for Cohorts:

This is the schedule that will occur over the 8 week/40 business day monitoring window. If needed, adjustments may be made to the schedule to ensure CHSP and the selected agency are able to complete CoC responsibilities.

Day	Agency
1	Receive agency evaluation tool, self-assessment, and requests to schedule on-site client file review date and conference call date
15	Self-assessment is due
20-35	On-site client file reviews occur; agency evaluations occur; HMIS security checks occur
36	Receive summary report covering agency evaluation & file review
37-40	Conference calls occur to discuss self-assessment, summary report, and develop a TA plan
40	Receive TA plan and schedule TA activities for future dates

IX. Results:

On day 36 the agency will receive a monitoring summary report which will include the results of the agency evaluation and the on-site client file review components. A conference call or on-site follow-up appointment with the agency and CHSP staff will be held within 5 days to discuss the results, answer questions about the report, discuss the self-assessment component, and decide what to include in the technical assistance (TA) plan.

X. Technical Assistance:

Types of technical assistance may include:

- A. Formal or informal discussions;
- B. Referrals to training;
- C. Special/tailored training sessions;
- D. Feedback on drafted or revised policies; and
- E. Referrals to other content experts within or outside of Monterey and San Benito's CoC.

The process of completing monitoring components and receiving results from CHSP is also considered technical assistance due to the potential for agencies to develop additional understanding of requirements and practices by participating.

After the conference call or on-site follow-up occurs in which the agency and CHSP staff agree upon areas in which technical assistance is needed and available, CHSP will write a TA plan and send it to the agency. The following five days will be reserved to provide TA, either to individual agencies or to a group within the cohort. If TA cannot be provided in that timeframe, it will be scheduled for a future date.

XI. Remedial Action and Sanctions

CHSP will review the performance of each agency in carrying out its responsibilities. For programs that fail to meet program requirements:

- A. CHSP shall notify the agency of the nonperformance and/or non-compliance with CoC Program regulations, taking into account participant comments and complaints.
- B. If the agency fails to respond to the proposed corrective actions of the corrective action plan, or fails to reply within the designated time frames, and is not able to demonstrate compliance, the following sections describe remedial actions and sanctions that may be taken or imposed by both HUD and/or The Continuum of Care.

Remedial Actions: Remedial actions as described at 24 CFR part 578.107(b)(1) may include the following:

- A. Developing and following a schedule of actions for carrying out project activities and projects affected by non-compliance, including schedules, timetables, and milestones;
- B. Establishing and following a grants management plan that assigns responsibilities for carrying out remedial actions;

- C. Canceling or revising project activities or projects likely to be affected by noncompliance before expending associated grant funds;
- D. Re-programming grant funds not yet expended for given activities or projects to eligible costs or projects;
- E. Suspending funds disbursement;
- F. Influencing future scores in the CoC ranking process;
- G. Reducing or terminating an agency's remaining grant funds and re-allocating funds to other agencies or returning funds to HUD; and
- H. Requiring matching contributions to be made before or in conjunction with draws being made from the agency's grant.

Sanctions by HUD: Sanctions, as defined at 24 CFR part 578.107(b)(2) through (9), may include the following:

- A. Changing method of payment to reimbursement;
- B. Suspending payments to preclude the further expenditure of funds for affected projects or activities;
- C. Continuing the grant with a substitute recipient of HUD's choosing;
- D. Denying matching credit for all or part of the cost of the affected activities and requiring further matching contributions;
- E. Requiring the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities;
- F. Reducing or terminating the remaining grant;
- G. Imposing conditions on a future grant; and
- H. Imposing other legally available remedies.

XII. Communication Strategy:

Regarding the timely follow-through on monitoring activities, CHSP aims to work collaboratively, not punitively, with monitored agencies and provide clear communication and expectations throughout all components so that activities can be successfully fulfilled.

Additionally, CHSP has established a protocol to provide **3 reminders** to agencies regarding missed deadlines. After three reminders have been issued, CHSP will take note in the monitoring report of actions and activities that are incomplete, and this information may be shared as outlined in the “Sharing Monitoring Results” section.

XIII. Evaluation:

CHSP staff will conduct an end-year evaluation of the process by asking agencies to complete a survey, reviewing aggregate monitoring results, and seeking feedback from the monitoring workgroup. Aggregate monitoring results will contain data including, but not limited to, the number of policies/procedures that are revised, the number of new policies/procedures that are created to address identified gaps or improve future compliance, and the number of resources or connections provided to monitoring recipients. Following the end-year evaluation, CHSP will identify best practices and make recommendations for any adjustments needed to the next year’s process. A year after monitoring is completed, when the agencies have completed another year of the local evaluation, the agencies will be asked to complete an additional follow-up survey with questions that will help determine the impact of the completed monitoring components on score changes or trends. CHSP will also track HUD audits that occur after agencies are monitored to determine if the process contributed to prevention of findings or concerns.

XIV. Sharing Monitoring Results:

Aggregate monitoring results will be shared with workgroups and the community at large to illustrate system strengths and weaknesses that are identified through the monitoring process. Information will be shared without disclosing the performance of specific agencies/projects. However, specific groups have the potential to receive monitoring results that disclose the performance of specific agencies/projects.

The groups that may receive this type of information are:

- A. The Leadership Council;
- B. Oversight Committee;
- C. CHSP Board of Directors;
- D. Monterey and San Benito County's Department of Human Services and Department of Social Services; and
- E. HUD.

The circumstances under which identifiable information will be shared with these groups are:

- A. If findings from the monitoring are significant enough that those deciding on matters of funding and/or ranking should be made aware of them;
- B. If the monitoring uncovers agency/project misrepresentation of information in the evaluation; or
- C. If the agency/project does not participate in all components of the monitoring process.

Appendices

I. Glossary of Common Terms:

Collaborative Applicant: an instrumentality of state or local government, local government, nonprofit, state, or public housing authority that has been designated by the Continuum of Care to collect the required application information from all projects within the geographic area of the Continuum and apply for a grant.

Recipient: an applicant that signs a grant agreement with the U.S. Department of Housing and Urban Development (HUD), as defined in Section 424 of the McKinney-Vento Act.

Subrecipient: a private nonprofit organization, State or local government, or instrumentality of a State or local government that receives a subgrant from the recipient to operate a project. The definition of “subrecipient” is consistent with the definition of “project sponsor” found in Section 401 of the McKinney-Vento Act.

II. Proposed Monitoring Criteria:

Administration and recordkeeping activities include, but are not limited to: Continuum of Care Records (24 CFR 578.103(a)(1)) As the jurisdiction’s CoC Collaborative Applicant, CHSP will maintain documentation relating to establishment and operations of the local Continuum of Care (CoC).

1. Homeless Status – Documentation of literal homelessness as defined in 24 CFR Part 576.500(b).
2. At Risk of Homeless Status – Documentation that establishes “at risk of homelessness” status of each individual or family who receives homelessness prevention assistance as defined in 24 CFR Part 576.500(c).
3. Chronically Homeless Status – Documentation that establishes “chronically homeless” status of each individual or family who receives assistance as defined in 24 CFR Part 578.3.
4. Reasonable Belief of Imminent Threat of Harm – Documentation for people who moved to a different Continuum of Care (region) due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under 24 CFR Part 578.51(c)(3).
5. Annual Income – Perform initial, and at least annually thereafter, a review of income for people receiving housing assistance where rent or occupancy charge is paid by the program participant. The annual income review will be performed in compliance with 24 CFR Parts 578.77. Calculating Occupancy Charges, Rent and Annual Income will be entered in HMIS using the anniversary of the program

6. entry date that is established “when the fiscal payment of rent begins (first date of Housing Assistance Payment)” regardless of the date when the actual income review was completed, as long as this review was no sooner than 30 days prior to the anniversary date, and no later than 30 days following the anniversary date. The supporting income documentation will be retained in the participant case file, and may be uploaded into HMIS for agencies using electronic filing.
7. Program Participant Records – Documentation for each program participant receiving services, an annual assessment of services for those program participants that remain in the program for more than a year, and compliance with the termination of assistance requirements under 24 CFR 578.91.
8. Housing Standards - Documentation of compliance with the housing quality standards (HQS), to include inspection reports under 24 CFR 578.75(b).
9. Services Provided – Documentation of supportive services provided under the agencies or subrecipients program and the amounts spent on those services, to include the annual assessment of services for participants and that the service package offered to program participants was adjusted, as applicable.
10. Services to Families/ Youth - Agencies must have a designated staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community (Education), including early childhood programs such as Head Start. A policy must be in place to ensure that families with children under the age of 18 are not denied admission or separated when entering housing. 24 CFR § 578.93 (e); 24 CFR § 578.23 (c)(iii)(iv).
11. Match – Records of the source and use of contributions made to satisfy the match requirement in 24 CFR 578.73, to include the records of match provided by subrecipients. The record will show how the value placed on third party in-kind contributions was derived.
12. Conflicts of Interest – Documentation to show compliance with organizational conflict-of interest requirements.
13. Homeless Participation – Documentation to show compliance with the homeless participation requirements.
14. Faith-Based Activities – Documentation to show compliance with the faith-based requirements under 24 CFR 578.87(b), as applicable.
15. Affirmatively Furthering Fair Housing – Maintain marketing, outreach and other materials used to inform eligible persons of the program to document compliance with the requirements in 24 CFR 578.93(c).

16. Other Federal Requirements – Documentation in support of compliance with 24 CFR 578.99, as applicable. www.fhrs.gov
17. Subrecipients and Contractors – The agency will retain copies of all solicitations from and agreements with subrecipients, records of payment requests and payments, and documentation of monitoring findings with corrective actions of subrecipients, as applicable.
18. Other Records Specified by HUD - Other documentation defined in 24 CFR 578.103(a)(17).

Reference of Codes, Regulations, and Requirements

Code of Federal Regulations: Title 24 part 578, 2 CFR part 200

Compliance with other federal requirements (i.e. lead based paint, Section 3, Section 504), if applicable 24 CFR § 578.99; 24 CFR § 35; 24 CFR § 578.3

Environmental Review 24 CFR § 578.99; 24 CFR § 578.31

Fair Housing and Equal Opportunity requirements 24 CFR § 578.93; 24 CFR § 578.103(a)(15)

Fair Housing Laws and Presidential Executive Orders

https://www.hud.gov/program_offices/fair_housing_equal_opp/FHLaws

HMIS Security Plan and Quarterly Compliance Checklist

<http://www.chspmontereycounty.org/wp-content/themes/chsp/img/Security-Plan.pdf>

HUD-CoC Notices <https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#notices>

The Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) of 2009

The McKinney-Vento Homeless Assistance Act As Amended by S.896