

Title: 4.5. Policies & Procedures for Monitoring CoC Programs

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Reviewed By: Governing Council

Approved By: Governing Council

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Purpose:

The purpose of the policy is to outline the process for monitoring recipients and subrecipients of CoC funded programs as outlined in HUD's 24 CFR 578 CoC Interim Rule. This process will outline the roles and responsibilities of the Collaborative Applicant, recipients and subrecipients of CoC funding, and the MSCHC Consortium in the monitoring process. The purpose of this monitoring process is to assess programs for their ability to meet system performance measure goals, effectively operate programming, comply with HUD requirements, meet HMIS data standards and requirements, and meet any additional CoC requirements as outlined below.

Scope:

This policy applies to everyone who operates under the umbrella of the CoC, including the CoC and HMIS Lead Agencies, the MSCHC Governing Council, and agencies that receive CoC-funding for program operation.

Policy:

Each year, the CoC Lead Agency, who serves as the Collaborative Applicant, will monitor all CoC funded programs prior to the release of that year's CoC Competition NOFA. The timeframe for monitoring will happen in late spring, with flexibility afforded to the CoC Lead Agency to accommodate scheduling with programs.

Monitoring Meetings

The CoC Lead Agency will schedule one in person meeting with each agency that receives CoC funding regardless of the number of CoC-funded projects the agency has. Meetings will consist of:

- **Site Visit Checklist:** This checklist will be sent by the CoC Lead Agency to agencies 2 weeks prior to the monitoring meeting. The checklist will be reviewed by the CoC Lead Agency and will assess the program's capacity to meet CoC Interim Rule program requirements in 24 CFR 578. Prior to this visit three random client case files will be selected to be digitally and physically reviewed for program's abilities to meet record keeping requirements, HMIS data standards, and supportive services requirements. The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services.
- **Site Visit Interview:** This interview will allow the program staff to give feedback and insight into the success and challenges faced in the last year of operating the program. This will also include an opportunity for programs to give feedback on CoC processes, and additional information that may help guide system improvements.

Monitoring Results

Monitoring evaluation reviews are kept on file for each project by the CoC Lead Agency. Results of reviews are used to improve project and system performance, contribute data for ESG and CoC federal grant applications, and inform ESG and CoC funding eligibility and awards at federal, state and regional levels (i.e. CoC NOFA and ESG RFP process). These reviews collectively provide the opportunity to see performance at a system-level for overall progress toward ending homelessness as well as specific areas where performance improvement can enhance the CoC's efforts.

Specific monitoring results, such as poor project performance or projects not following policies outlined in the Governance Charter or CoC regulations, may also require projects to be placed on a Performance Improvement Plan (PIP) to address programmatic concerns prior to the release of the CoC Competition NOFA for that year. CoC Lead Agency staff will inform projects of identified issues, and project staff will complete a PIP plan and submit back to CoC Lead Agency staff for review and approval. This plan will include measurable goals, action steps that will be taken to meet goals, and any identified TA that may be needed from CoC Lead Agency staff as outlined in Section 4.6 Performance Improvement Plans.

CoC Lead Agency Responsibilities

Each monitoring visit will be composed of agency program staff and at least two CoC Lead Agency staff with knowledge on CoC programs, CE processes, and HMIS data standards. Agency program staff must include the program director and, if needed, any additional staff members that the program director feels are essential to the monitoring process. CoC Lead Agency staff will be responsible for scheduling monitoring meetings, reviewing all documents provided by the program, and conducting the monitoring interview. CoC Lead Agency staff will also be responsible for informing the Rank and Review Committee of any findings from the monitoring evaluation review, including program successes concerns.

Program Staff Responsibilities

Program staff are responsible for attending monitoring visits, preparing and providing all documentation necessary for the monitoring process, and communicating with CoC Lead Agency staff. Program staff are also responsible for meeting all deadlines outlined in the monitoring process. Timeliness and/or non-compliance issues will be noted by CoC Lead Agency staff and included in the monitoring evaluation review that is provided to the Rank and Review Committee.

Sharing Monitoring Results

Aggregate monitoring results will be shared with workgroups and the CoC at large to illustrate system strengths and weaknesses that are identified through the monitoring process. Information shared with these groups will be done without disclosing the performance of specific agencies/projects. 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 the Rank and Review Committee, Governing Council, and HUD. The circumstances under which identifiable information will be shared with these groups are: if findings from the monitoring are significant enough that those deciding on matters of funding and/or ranking should be made aware of them or if the agency/project does not participate in all components of the monitoring process.

Provision for Electronic Monitoring

To ensure that monitoring procedures can be completed in the most effective and efficient ways, the CoC Lead Agency reserves the right to complete monitoring in person, electronically, or a combination of both.