CoC Monitoring

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Connecticut Balance of State Continuum of Care

Ending Homelessness in Connecticut | **Email:** ctboscoc@gmail.com | **Website:** www.ctbos.org

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Agenda

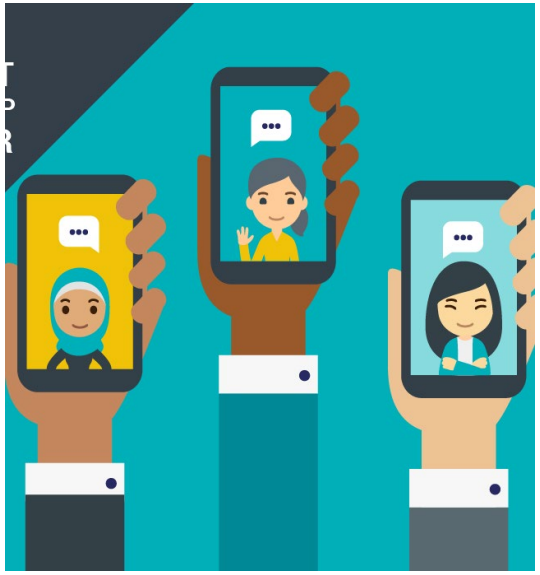
- Monitoring Goals
- Common Monitoring Findings
- What to Expect During Monitoring
- Overview of Monitoring Guide
- Recent Changes to Monitoring Guide
- Preparing for HUD Monitoring
- Tips and Tools to Avoid Common Findings
- Suggestions, Questions & Answers

Webinar: Introduction to CTBOS for New Staff

Date: February 5th, 2020 9:30-11:30

Advance registration is required.

To register: https://zoom.us/webinar/register/WN_upBSKr3ETTal1Gj9mSwdHQ



Webinar: DMHAS CoC Rental Assistance Operations Guide – What's New?

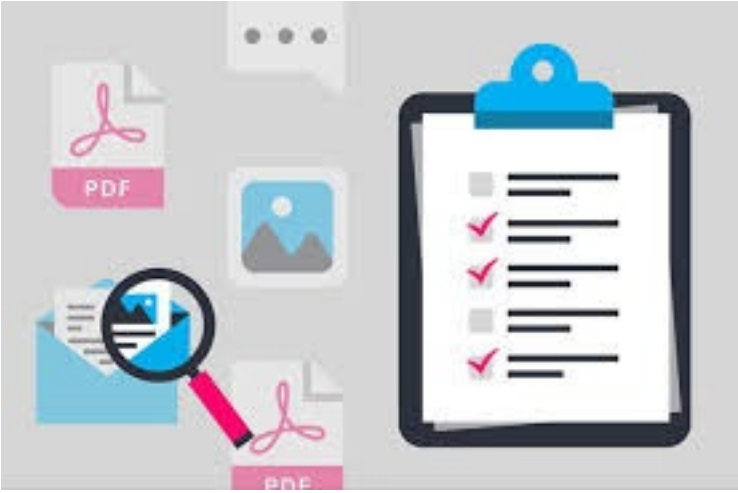
Date: February 7, 2020, 10 am

Advance registration is required.

To register: https://zoom.us/webinar/register/WN_dwBdktScRWWMLtTjFXudcg

Background

- HUD requires CoCs to monitor funded projects.
- HUD requires recipients of CoC funds to monitor subrecipients.
- On behalf of CT BOS & DMHAS, Housing Innovations conducts monitoring for a subset of projects annually – 54 since 2014



Monitoring Goals

- Help projects to prepare for HUD monitoring visits
- Reduce the risk of funding being recaptured by HUD
- Help projects to understand and follow HUD, DMHAS, CT BOS, CAN, YHDP, & DOH RRH requirements
- Identify areas of need for training and technical assistance

Federal Requirements

CoC Program Interim Rule:

https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/

Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards:

https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200

HUD CoC Program Notices:

https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#notices

Local Requirements

Available at www.ctbos.org:

- CT BOS Policies
- CT CAN Policies
- CT RRH Model Guidelines
- DMHAS CoC Rental Assistance Operations Guide
- CT BOS YHDP Requirements

CoC Monitoring Guide

- Includes criteria used during monitoring
- Cites regulations, notices, and policies
- Includes links to resources
- Available at: http://www.ctbos.org/resources

Direct Services	Requirements
Engagement	Data Entry
Case Management	Document-ation
Aftercare	Compliance & Monitoring

Resource Availability

Common Monitoring Findings

Staff are:

- Navigating complicated and difficult situations with limited resources.
- Compassionate and persistent in finding ways to engage & serve their clients.
- Overwhelmed by the rules, but eager to understand and follow the requirements.

Common Findings (2)

- Results suggest that:
  - Monitoring has helped to clarify the federal and local requirements.
  - Improvement but documentation remains inconsistent:
    - Homeless and/or chronic homeless status
    - Frequency of services commensurate with need
    - Rent reasonableness determinations
    - VAWA notice and lease requirements

- Lack of understanding of difference between admin and indirect expenses and lack of documentation of admin expenses - most projects not claiming indirect
- For staff working on more than one project or budget line item documentation of staff time spent on eligible activities is lacking (e.g., through use of personnel activity logs).

Common Findings (3)

- Inconsistent implementation of Housing First
- Compliance based service plan goals
- Legacy PSH projects with no dedicated services serving people with intensive service needs:
  - No assigned case manager
  - Tenants may only be contacted once per year
  - May be discharged from case management for failure to engage
  - Unable to meet HUD and CoC requirements
- Many projects have no protocol for regular internal chart audits.

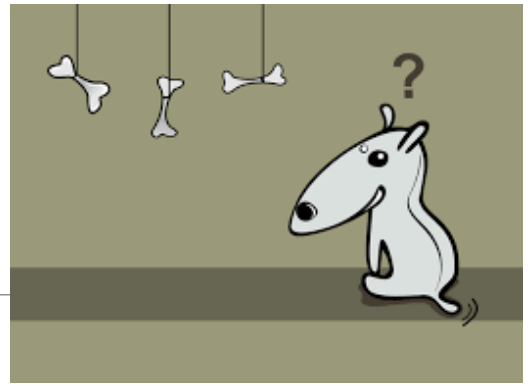
What to Expect During Monitoring

Monitoring Selection Criteria

Primary Factors:

- Prioritize larger grants
- Prioritize agencies that have not had CoC projects previously monitored by CT BOS or DMHAS
- Prioritize agencies that are new CT BOS CoC grant recipients or subrecipients
- Prioritize agencies with poor performance on a previous monitoring visit

Monitoring Selection Criteria (2)



Other factors:

- A history of poor performance on the annual renewal evaluation
- A history of not fully spending project funds
- Complaints filed by a consumer or other CoC stakeholders
- Concerns raised by the HUD Field Office
- Other evidence of non-compliance with HUD, DMHAS or CT BOS requirements
- Usually one ODFC project annually
- Usually agencies will not be monitored on more than one type of CoC project during the year or in the same year of CSH QI review.

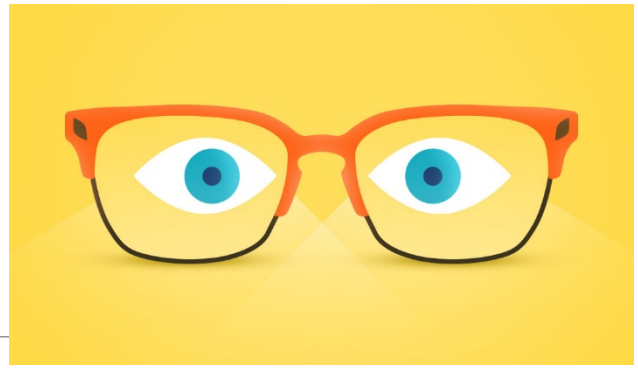
Elements of Monitoring

- Notification
- Pre-visit documentation submission and review
- Entrance/Exit Conferences
- Participant Chart Review
- Fiscal Review
- Brief Program Tour
- Staff and Client Interviews
- Report & Follow-up Plan

Report Key	
FINDINGS HIGHLIGHTED IN PINK	Signify area of non-compliance with federal, state and/or CoC requirements and risk of funding recapture. Submission of follow up plan required.
FINDINGS HIGHLIGHTED IN YELLOW	Signify area of non-compliance with federal, state and/or CoC requirements. Findings should be corrected. Submission of follow up plan is not required but agencies should note these are contractual obligations of the funding source(s).
CONTENT HIGHLIGHTED IN GREEN	Signifies best practice recommendations for consideration. Action is not required.

Overview of Monitoring

Visual Observations



- Financial records and valuables secured in limited access area
- Client information maintained in confidential manner
- Drug free work place statement posted
- Units: adequate space, light, ventilation, etc.

Financial Requirements

- Fiscal policies, procedures and records
- Source and application of funds
- Internal controls
- Recording of expenses (including salaries) by eligible activity
- Expense eligibility
- Program income
- Match
- Admin & Indirect
- Accounting records reconcile with e-LOCCS
- Audit

Administrative Requirements

- Program Fees: May not charge any fees other than rent.
- Subrecipient monitoring/agreements
- Homeless participation on board of directors
- Client Bill of Rights
- Nondiscrimination, Fair Housing,
- Accessibility (disabilities & language)
- Conflicts of Interest
- Record Retention

Reporting and Contract Requirements

APR	• Submitted within 90 days of program end date
HMIS	• Participate • Submit data for all clients
Grant Amendment	• Executed doc on file • Prior approval
Number of Clients	• Consistent with or above application
Environmental Review	• Adhere to HUD Requirements

Housing Assistance

- CAN timely notification of vacancy
- Transparency for Participants/Landlords
- Housing Search
- Housing Quality Standards/Rent Reasonable
- Leases, HAP Contract and Owner Assurances
- Security Deposits and Damages
- VAWA Emergency Transfers, Lease & Notification Requirements

Housing Assistance (2)

Calculation of Occupancy Charges/Rent

- Calculate rent properly
- Apply appropriate deductions and adjustments
- Aligns with lease (e.g., rent amount, utility allowance, # of adults)

Income Review

- Annually or when change in income
- Income, deductions, lack of income documented

Housing Assistance (3)

Regardless of household composition

Equal Access

Family Change

Allow to alter family composition change at any time **exceptions

Relocate to right-sized unit & services as appropriate

Household Change

Dwelling Size

At least 1 bedroom &/or sleeping room per 2 ppl

Coordinated Entry and Eligibility

- Follow CAN policies
- Appropriate declinations only
- **Eligibility documentation** – homeless status, chronic homeless status and disabling condition (latter 2, PSH only), income (RRH & TH), age (YHDP)
- Written Intake Procedures
- Sample available at www.ctbos.org

CT BOS YHDP – Homelessness Requirements

YHDP Project Type	CoC Program Component Type	Eligible Participants
Shelter Diversion/Rapid Exit Fund	RRH	Categories 1,2,4
Youth Navigators	SSO	Categories 1,2,4
Crisis Housing	TH	Categories 1 & 4
Rapid Rehousing	RRH	Categories 1 & 4

Category 2 Youth Eligible only for Shelter Diversion/Rapid Exit and Navigator Services

Non YHDP CT BOS – Homelessness Requirements

Project Type	Eligible Participants
PSH (Current Requirement)	Chronically Homeless
PSH (Starting 1/1/21)	Dedicated Plus
DV Bonus RRH	Category 4
All Other RRH	Categories 1 (excluding people living in TH) & 4
TH	Categories 1 & 4

Housing Focused Case Management Services

Services

Services for PSH – supportive services are made available and tailored to the specific needs of program participants.

Housing First – All projects follow HF principles (available at www.ctbos.org)

Confidentiality – adequate procedures and releases

Education - Designated Staff and updated Policies & Practices (available at www.ctbos.org)

Termination and Discharge – meet HUD requirements

Ch-ch-ch-changes!

Earlier Notice

- All projects selected for monitoring have been notified.
- Most dates have been confirmed.

Expanded in 2020– Remote Monitoring

- Focus on most significant requirements, previous findings and new requirements

Options:

- Upload unredacted documents into client HMIS records.
- Give HI Time limited remote access to your electronic record system; or
- Redact selected documents and submit to HI via Dropbox or email.

Added HUD Requirements

- Added federal requirements not previously monitored
- Aligned with Revised HUD CPD Monitoring Handbook (6509.2 Rev 7):

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

Federal disability related requirements

- Review of reasonable accommodation records
- Accessibility for and effective communication with people with disabilities
- Accessible technology

https://cct.org/wpcontent/uploads/2015/08/2015ADAComplianceGuide.pdf

Federal Limited English Proficiency (LEP) Requirements

Assess:

- Frequency of encounters with people with LEP
- Resources available

Determine:

- What language needs exist
- Reasonable steps to ensure access

https://www.lep.gov/guidance/HUD_guidance_Jan07.pdf

Alignment with State Policies

Available at www.ctbos.org

- CT CAN Policies
- CT RRH Model Guidelines
- DMHAS CoC Rental Assistance Operations Guide
  - See slide # 3 for webinar information
- CT BOS YHDP Requirements

HUD Monitoring

HUD Monitoring Exhibits

HUD monitoring exhibits available at:

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

HUD Monitoring Areas

Beneficiaries	Housing	Supportive Services	Project Progress
Match Documentation	Subrecipient Management	Overall Systems Management	Financial Management
Cost Allowability	Procurement	Equipment and Equipment Disposition	Other Federal Requirements

Tips and Tools to Avoid Common Findings

- Ensure you are correctly billing Administrative Costs
- Use cash match and don't overcommit
- For staff working on multiple projects, or budget line items, complete personnel activity logs*
- Supervisory review of eligibility documentation
- Conduct regular internal chart review
- Participant Chart Monitoring Prep Guidance*
- CT BOS Monitoring Links to Helpful resources*
- Be sure current staff are signed up to receive CT BOS emails -be sure to select "HUD Grantees"

* available at www.ctbos.org/resources

Final Questions?

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