

# CoC Monitoring & Participant Chart Documentation Requirements

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**Connecticut Balance of State Continuum of Care**

*Ending Homelessness in Connecticut* | Email: [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com) | Website: [www.ctbos.org](http://www.ctbos.org)



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# Agenda

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- Overview of Monitoring
- What to Expect During Monitoring
- 2020 & 2021 Changes to Monitoring Guide
- Avoiding Common Monitoring Findings
  - New Tool - Participant Chart Documentation Requirements by Project Type
- Preparing for HUD Monitoring
- Final Suggestions & Questions



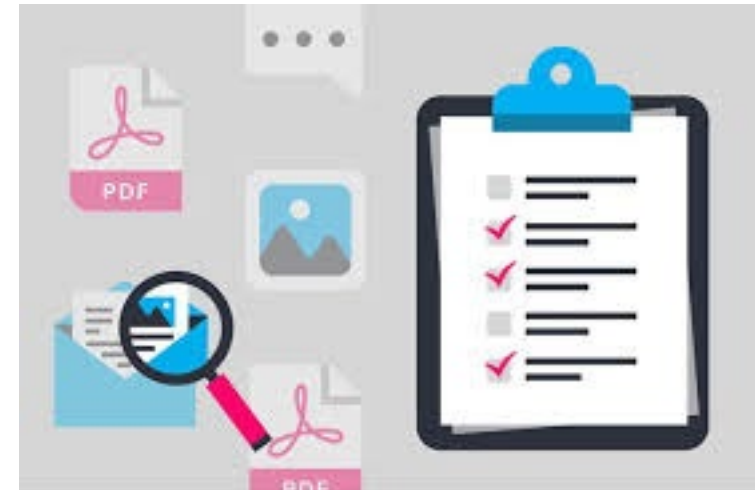
# Overview of Monitoring

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# Background

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- 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 CoC projects annually.
  - ✓ 16 CoC Projects Slated for 2021 Monitoring



# Federal Requirements

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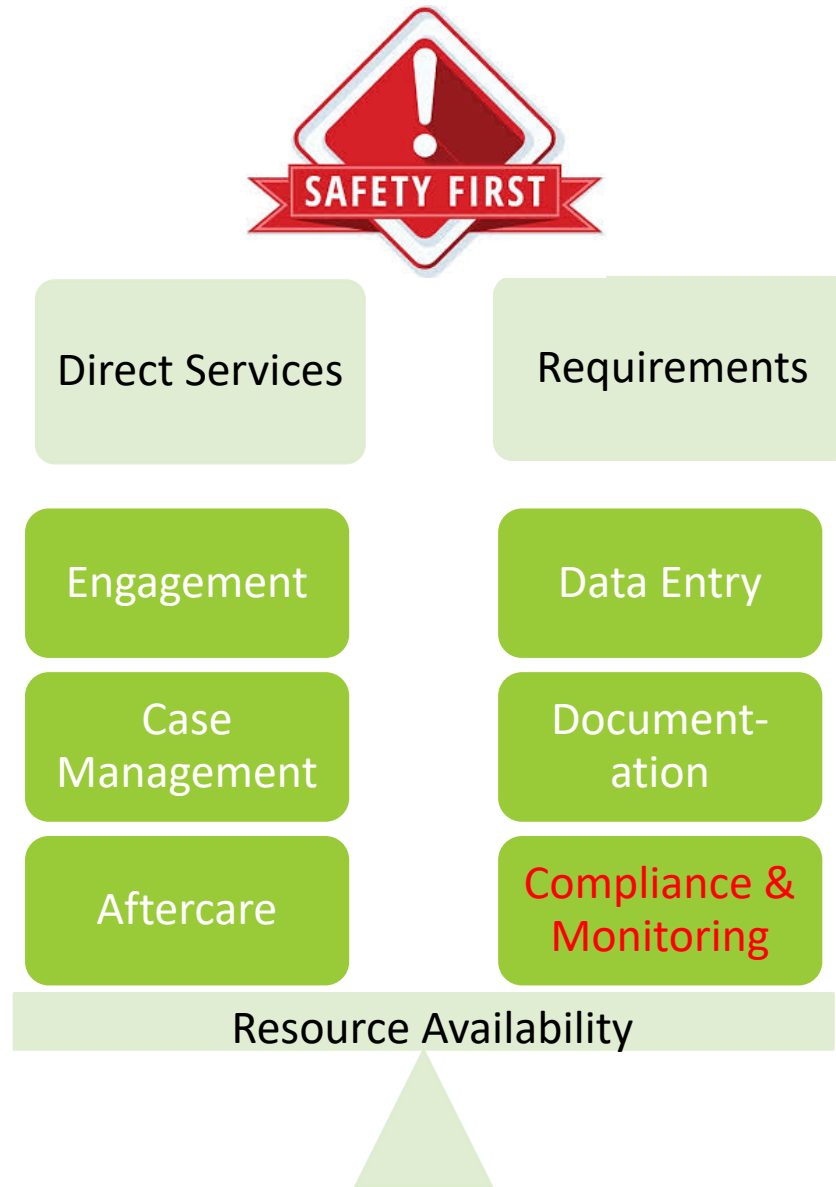
- [CoC Program Interim Rule](#)
- [Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards](#)
- [HUD CoC Program Notices](#)
- [HUD CoC Program NOFA](#)
- [HUD CoC FAQs](#)
- [YHDP HUD Resources for Service Providers](#)

# Local Requirements

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- CT BOS Policies
- CT CAN Policies
  - Proposed Dedicated PLUS Revisions to CAN Policies
- CT RRH Model Guidelines
  - *Coming in 2021: DOH RRH Operations Guide*
- DMHAS CoC Rental Assistance Operations Guide
- CT BOS YHDP Requirements







### Staff are:

- Navigating complicated and difficult situations with limited resources – NOW MORE THAN EVER!
- Compassionate and persistent in finding ways to engage & serve their clients.
- Often overwhelmed by the rules, but eager to understand and follow the requirements.



# Monitoring Goals

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- Help projects to understand and follow the requirements
- Help projects to prepare for HUD monitoring visits
- Reduce the risk of funding being recaptured by HUD
- Identify areas of need for training and technical assistance



# Stewardship of Funds

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**Goal:** To help projects to understand and follow requirements

**As necessary:** Steering Committee may reallocate funds when a project is significantly out of compliance and unable to make necessary corrections.



# Monitoring Selection Criteria

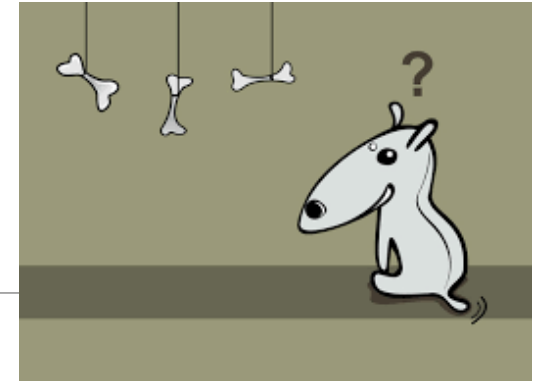
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## Primary Factors:

- 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 DMHAS QI review.



# What to Expect During Monitoring

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# CoC Monitoring Guide - No Surprises!

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- Compiles requirements into one document
- Includes criteria used during monitoring
- Cites regulations, notices, and policies
- Includes links to resources



# Elements of Monitoring - No changes

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



Report Key	
<b>FINDINGS HIGHLIGHTED IN PINK</b>	Signify area of non-compliance with federal, state and/or CoC requirements and risk of funding recapture. Submission of follow up plan required.
<b>FINDINGS HIGHLIGHTED IN YELLOW</b>	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).
<b>CONTENT HIGHLIGHTED IN GREEN</b>	Signifies best practice recommendations for consideration. Action is not required.



CH-CH-CH-CHANGES!

Changes to Monitoring

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# All Remote Monitoring in 2021

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- 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 (DISCOURAGED)



# New in 2021 - Zengine

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- BOS Grants Management Database
- CT BOS providers must enroll in Zengine to be able to submit necessary documents.
- Providers will submit Monitoring documents through Zengine.
- More information available [here](#)



# New in 2021 - Dedicated Plus Eligibility for PSH

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- BOS CoC DedicatedPLUS Webinar: [Slides](#) & [Recording](#)
- [Updated Homelessness Verification Form](#)
- [Sample Letters for Documenting DedicatedPLUS Status](#)
- [Sample Project Intake Policy](#)



# New in 2021 – HUD COVID-19 Waivers

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- Grantees must notify HUD & CT BOS of intent to use new waivers and extensions. [Memo on Round Three of COVID-19 Related Waivers to CoC & ESG Requirements](#)

- Notify Hartford Field Office in writing no less than two days before using the waiver flexibility

## **SUBMIT TO HUD:**

[CPD\\_COVID-19WaiverHAT@hud.gov](mailto:CPD_COVID-19WaiverHAT@hud.gov)

## **Submit Copy to CT BOS:**

via Zengine -instructions for [Creating an Account](#) and [Submitting Documents](#)

- [Updated CoC, ESG, Waiver Notification Template](#)

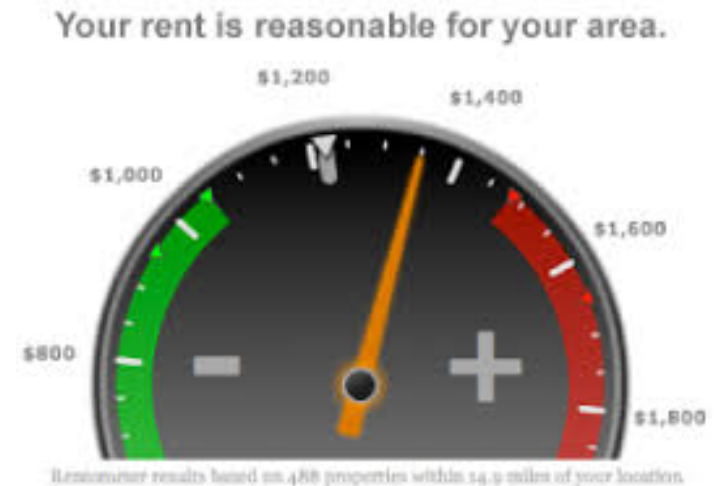


# New in 2021 – Rent Reasonableness Policies and Procedures

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Recipients and Subrecipients must have written policies and procedures for:

- Documenting comparable rents
- Determining rent reasonableness
- Documenting rent reasonableness in case files





# Reminder: Rent Reasonableness

- Rents must be reasonable based on comparable units in the community & may not exceed rents currently being charged by the same owner for comparable unassisted space:
  - ✓ Units assisted with rental assistance funds can exceed FMR within available project budget
  - ✓ Units assisted with **leasing funds cannot exceed FMR**
- Must determine whether the rent charged is reasonable, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit.
- Document 3 comparable units – rent for assisted unit must not be higher than comparables
- DMHAS “Rent Reasonableness Checklist and Certification” form



Changes from 2020

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# Federal disability related requirements

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- 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>



# Accessibility of Electronic Documents Webinar

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- Date - February 18, 10 – 11 a.m.
- [Click to Join](#)
- Meeting ID: 874 8360 2115
- Passcode: 012972
- Phone: 646-876-9923



# Federal Limited English Proficiency (LEP) Requirements

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## **Assess:**

- Frequency of encounters with people with LEP
- Resources available

## **Determine:**

- What language needs exist
- Reasonable steps to ensure access

## **Resources:**

- [Sample Language Access Policy](#)
- [Final HUD Guidance – Prohibition Against Discrimination Affecting LEP Persons](#)



# Avoiding Common Monitoring Findings

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# Internal Chart Review – Avoid Surprises



Ensure supervisory review of all eligibility documentation.



Conduct an internal chart audit at least annually.



Use electronic health record to identify missing & overdue docs & gaps



# New Tool: Participant Chart Documentation Requirements by Project Type

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Indicates which documents should be in CoC Program Participants' charts for:

- Permanent Supportive Housing
- Rapid Rehousing: includes DV Bonus, YHDP RRH and YHDP Diversion/Rapid Exit
- Transitional Housing: includes YHDP Crisis Housing
- YHDP Youth Navigator
- Links to required forms, sample forms and other guidance
- REMINDER: Retain all documents for a minimum of 5 years. Maintain participant eligibility documentation for 5 years after the end date of the last grant operating year during which a participant was served.



Document Type	PSH	RRH (includes Bonus & YHDP RRH/DivRE)	TH (includes YHDP Crisis Housing)	YHDP Youth Nav
Documentation of <b>Homelessness</b> - Must document homelessness at project entry (i.e., the date on which the applicant accepts an available spot in the project – project entry may precede the date housed)	X	X	X	X
Documentation of <b>Disability</b>	X Must also include documentation of DMHAS eligibility <sup>1</sup> if applicable			
Documentation of <b>Age</b> - at least one member of the household must be 18 or older; no member of the household can be older than 24 at project entry <sup>2</sup> .		X YHDP RRH & DivRE Only	X YHDP Crisis Housing Only	X

# Non YHDP CT BOS – Homelessness Requirements

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Project Type	Eligible Participants
PSH (Starting 1/1/21)	DedicatedPLUS
DV Bonus RRH	Category 4
All Other RRH	Categories 1 (excluding people living in TH) & 4
TH	Categories 1 & 4



# 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

# Eligibility Verification

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Updated 11/30/20:

- [CT BOS Homelessness Verification Form](#)
- [Sample Letters Documenting Dedicated Plus](#)
- [Sample Project Intake Policy](#)

[Disabling Condition CT BOS CoC Form](#) (updated 10/9/20)



# Service Frequency & Assertive Engagement

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- Timely intervention on issues that threaten housing stability/health/wellbeing
- In general, contact/attempts occur at least two times/month (PSH/TH)
  - ✓ Less frequent contact/attempts supported by an assessment indicating a lower level of need
- RRH case managers check-in with participants at least monthly
- Regular attempts using a variety of contact methods to engage participants who decline services / demonstrate reluctance to engage:
  - ✓ Phone, text, in person, invites to recreational opportunities, food, toiletries, etc.
- Home Visits (PSH/TH Required by DMHAS)
  - ✓ Frequency commensurate with need
  - ✓ At least once within first 30 days of tenancy and every six months thereafter

# Termination of Assistance

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Must be consistent with Housing First

- [Housing First Training](#)

Written notice of termination (does not apply to YHDP Youth Navigator):

- reasons for terminating - provide a written copy of rules
- notify participant of opportunity to appeal decision
- right to receive written notification of final decision
- Send the notification to the last known address, if current address is unknown.



# When is provision of VAWA forms required?

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The **Notice of Occupancy Rights & Certification form** must be provided at each of the following times:

- (A) When an individual or family is denied PSH, RRH, or transitional housing;
- (B) When a program participant is admitted to PSH, RRH or transitional housing;
- (C) When a program participant receives notification of eviction; and
- (D) When a program participant is notified of termination of assistance.

Eligible Costs	Approved Costs
All costs included in the CoC Program interim rule	<ul style="list-style-type: none"><li>• Each project has approved budget line items</li></ul>
	<ul style="list-style-type: none"><li>• Recipients may only spend CoC Program funds on approved costs</li></ul>
	<ul style="list-style-type: none"><li>• HUD approval is required to amend the budget to spend money on CoC Program eligible budget line items other than those that were included in the project budget approved through the application process</li></ul>



# Cost Eligibility - Tips

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**Know what Budget Line Items (BLI) your project has:**

- Rental Assistance
- Leasing
- Operating
- Project Administration

**Know what is eligible on each BLI:**

- [Overview of Fiscal Components of CoC Grants](#)



# Project Administrative Vs. Indirect Costs?

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**Project administrative** costs are specified at **24 CFR 578.59** – all expenses specified are eligible for reimbursement as Administrative Costs

- Includes overall program management, coordination, monitoring and evaluation
- Also includes specific activities such as monitoring subrecipients, training on CoC requirements and environmental reviews
- Activities not listed at 578.59 are not eligible to be reimbursed as administrative costs in CoC program



**Indirect, Facilities and Administrative Costs - 2 CFR 200.56** – costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited without effort disproportionate to the results achieved.



# Indirect and Administrative Costs Are Charged Differently

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Administrative costs are billed as direct costs - They must be billed based on actual costs incurred with backup for staff hours and benefits and reimbursable expenses



Indirect costs are billed based on a percentage of adjusted direct costs – once the rate is established (or the de minimis rate accepted) the costs can be billed without the necessity of backup documentation

# Training: Admin vs. Indirect

Understanding the  
DeMinimus Indirect  
Rate and Administrative  
Costs in CoC Programs

Consider claiming  
indirect costs



# Documenting Time

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- For employees who work on more than one project and/or Budget Line Item, timesheets must be supported by personnel activity logs (or case notes, maintenance logs).
- Time sheets must reconcile to activity logs.
- Sample [personnel activity log](#)





## Additional Tips and Tools to Avoid Common Findings

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- Use cash match and don't overcommit.
- Be sure current staff are signed up to receive CT BOS emails -select "HUD Grantees"
- *CT BOS Monitoring Links to Helpful Resources*

# Additional Resources

- [Introduction to the CT BOS CoC](#)
- [HUD CoC Policies – CT BOS](#)
- [Managing CoC Grants – CT BOS](#)



# YHDP Requirements & Resources

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[CT BOS Youth Page](#)

[CCEH YHDP Resources](#)



# Info on DOH RRH Requirements

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CT RRH Model  
Guidelines

RRH Forms

# More information on DMHAS CoC RA Requirements

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- [DMHAS CoC Rental Assistance Operations Guide Webinar](#)
- [DMHAS CoC Rental Assistance Operations Guide](#)
- [All DMHAS required CoC RA forms](#)







# Preparing for HUD Monitoring

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# HUD Monitoring Exhibits

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HUD monitoring exhibits available at:

[https://www.hud.gov/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2)



# HUD Monitoring Areas

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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



Final Suggestions & Questions?

# Contact Info

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