

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

- Overview of Monitoring
- What to Expect During Monitoring
- Changes to Monitoring Guide
- Avoiding Common Monitoring Findings
- Preparing for HUD Monitoring
- Additional Resources
- Final Suggestions & Questions

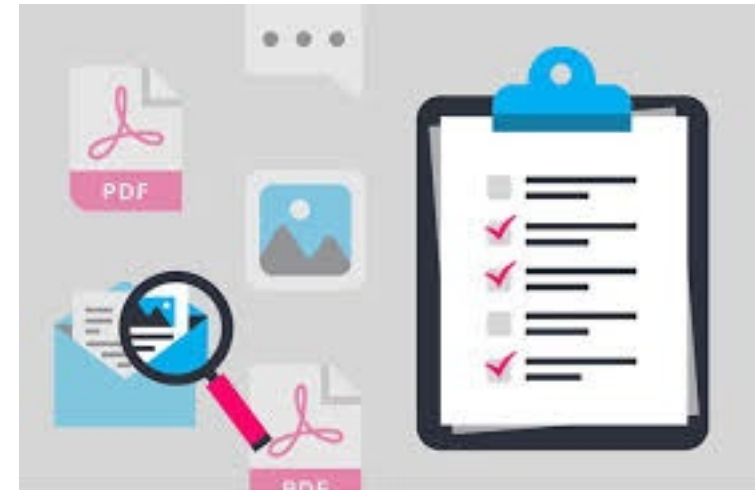




Overview of Monitoring

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 CoC projects annually.
 - ✓ 12 CoC Projects Slated for 2022 Monitoring



Federal Requirements



- [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 Youth Service Providers](#)

Local Requirements

- CT BOS Policies
- CT CAN Policies
- CT RRH Model Guidelines
 - Adjusted Statewide RRH Rent Schedule (Non-DV)
- DMHAS CoC Rental Assistance Operations Guide
- CT BOS YHDP Requirements





Common Monitoring Findings

Staff demonstrate:

- Resiliency in response to the pandemic
- Commitment to risk reduction
- Creativity in finding ways to build trust with and help clients get housed
- Adaptability in navigating difficult situations with changing demands & limited resources
- Eagerness to understand and follow the requirements – even though the rules are overwhelming



Monitoring Goals

- 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

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

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

Remote Monitoring



- Until further notice all visits will be remote.
- 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.

CoC Monitoring Guide - No Surprises!

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



Elements of Monitoring - No changes

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



Zengine

- 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](#)



REMINDER: Written Policies & Administrative Requirements



You need **only** submit:

- Policies you have **not** previously submitted
- Policies you have **changed**
- Policies you want us to consider to address previous findings

If you don't submit new policies, related findings will be carried forward from your most recent report.

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.

CH-CH-CH-CHANGES!

Changes to Monitoring

New in 2022 – RRH Rent Payment Standards

- **Months 1-2:** Security and 1st Month's Rent Covered at 100%.
- **Months 2-6:** Tenants pay 30% of net income towards rent.
- **Months 7 to program exit:** Tenants pay 60% of net income towards rent. Rental assistance terminates once 60% of net income is equal to rent.
- If tenant has been approved for PSH or other housing voucher (EHV, Mainstream, HCV, RAP) and is pending transition, tenant's portion calculated at 30% until transitioned to permanent subsidy.
- Does not apply to YHDP.
- Coming soon: Updated RRH rent calculation tool





New in 2022 — LGBTQIA+ Policy

Provide a safe, healthy, inclusive, affirming and discrimination-free environment, includes:

- Using participants' chosen titles, names and language to describe their identities
- Prohibiting disclosure of information regarding LGBTQIA+ identities without participants' authorization
- Promptly documenting and addressing all incidents of harassment, bullying, discrimination, and/or violence
- Connecting clients to gender affirming healthcare providers

New in 2022 – LGBTQIA+ Policy (2)

- Making single access restrooms available to people of all genders
- When gender specific programs, activities and facilities are allowable, enabling access consistent with gender identity regardless of gender expression or sex assigned at birth
- Ensuring that any dress codes apply equally to all genders and do not include gender-specific elements.



New in 2022 – LGBTQIA+ Policy (3)

- Establishing and publicly displaying LGBTQIA+ anti-discrimination policies;
- Equal Access Training Slides
 - Video Recording



New: Race Equity and Consumer Involvement (Best Practice)



Actions taken during past 12 months:

- Recruiting, retaining and promoting people with lived experience of homelessness (PWLEH) and people who identify as BIPOC and LGBTQIA+ in staff and Board positions
- Creating and maintaining an inclusive organizational culture that promotes equity
- Engaging PWLEH in meaningful opportunities to shape homeless services programs
- Reviewing consumer survey results and taking action accordingly

New: Race Equity and Consumer Involvement (2) (Best Practice)

Actions taken during past 12 months (continued):

- Developing partnerships with local organizations that focus on work with marginalized populations
- Analyzing who gets access to your agency's homeless services programs and program outcomes by race/ethnicity/sexual orientation/gender identity to determine if access and/or outcomes are disparate
- Planning and or implementation of steps to address any disparate access and/or outcomes



New: Race Equity and Consumer Involvement (3)



For agencies that have not taken actions in the past 12 months to advance at least 3 of the items:

- Briefly describe specific actions your agency plans to take over the next 12 months.
- Include a target date.

Race Equity Resources

- *[Race Equity Impact Assessment Tool](#)*
- *[CT CAN Data Dashboards](#)*
- *[Restorative Justice Practices in Housing Programs](#)*
- *[Race Equity Framework for the Connecticut Homeless and Housing System.](#)*



Avoiding Common Monitoring Findings



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



Participant Chart Documentation Requirements by Project Type

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 Homelessness - 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 Disability	X Must also include documentation of DMHAS eligibility ¹ if applicable			
Documentation of Age - 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 ² .		X YHDP RRH & DivRE Only	X YHDP Crisis Housing Only	X

Non YHDP CT BOS – Homelessness Requirements

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

Updated 1/11/21:

- [CT BOS Homelessness Verification Form](#)
- [Sample Letters Documenting Dedicated Plus](#)
- [Sample Project Intake Policy](#) (updated 11/23/20)
- [Disabling Condition CT BOS CoC Form](#) (updated 10/9/19)



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

Termination of Assistance

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.



Eligible Costs	Approved Costs
<p>All costs included in the CoC Program interim rule</p>	<ul style="list-style-type: none">• Each project has approved budget line items
	<ul style="list-style-type: none">• Recipients may only spend CoC Program funds on approved costs
	<ul style="list-style-type: none">• 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

Cost Eligibility - Tips

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

- Rental Assistance
- Leasing
- Operating
- Services
- Project Administration

Know what is eligible on each BLI:

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



Project Administrative Vs. Indirect Costs?

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

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

Admin & Indirect Training

Slide presentation:

[Indirect Cost Admin Training-PDF](#)

Webinar recording:

<https://youtu.be/YwjZYf7vMyc>

Consider claiming indirect costs



Documenting Time

- 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](#)





Preparing for HUD Monitoring



HUD Monitoring Exhibits

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



Additional Trainings



- Intro to CT BOS Zoom Link
- 3/23 from 10-11:30.
- Meeting ID: 895 8679 0212, Passcode: 001236;
Call-in number: 646 876 9923
- HUD CoC Policies – CT BOS
- Managing CoC Grants – CT BOS

YHDP Requirements & Resources

[CT BOS Youth Page](#)

[CCEH YHDP Resources](#)



Info on DOH RRH Requirements



CT RRH Model Guidelines

- [RRH financial policy updates -PDF \(2021.09\)](#)

RRH Forms

More information on DMHAS CoC RA Requirements

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





Final Suggestions & Questions?

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