Overview of the CT Continuum of Care Monitoring Process

HUD requires CoCs to monitor funded projects, and it requires recipients of CoC funds to monitor their subrecipients. The Connecticut Balance of State Continuum of Care (CT BOS) and the Connecticut Department of Mental Health and Addiction Services (DMHAS) conduct monitoring for a subset of CoC projects annually to help ensure projects are prepared for HUD monitoring visits, to reduce the risk of funding being recaptured by HUD, to support compliance with DMHAS and CT BOS requirements, and to identify areas of need for technical assistance and training. Most projects selected for monitoring are located in CT BOS. DMHAS also monitors its projects located in the Opening Doors Fairfield County CoC.

Monitoring will take place remotely until further notice. Monitoring is conducted by Housing Innovations (HI), on behalf of CT BOS and DMHAS. Additional details are included below. Please be sure to carefully review the section below titled *Preparing for CT Continuum of Care Monitoring.*

The HI team appreciates your work to end homelessness in CT and looks forward to learning more about your project. Please contact the HI staff member who is leading your monitoring visit with any questions or concerns (lpareti@housinginnovations.us or shannon@housinginnovations.us). HI works to continuously improve the monitoring process, please let us know if you have any suggestions for how to make the process better.

Structure of the day (please note that times are estimated):

9:00 – 10:00 am: Entrance Conference

10:00 am- 4:00 pm Participant Chart Review, Financial Record Review & Interviews

4:00 – 5:00 pm Exit Interview - the exit interview may be held earlier if the review is completed ahead of schedule.

Additional details are provided below:

- **Monitoring Guide:** The criteria used for monitoring are detailed in the monitoring guide. The guide was compiled as a resource for CoC projects based on the HUD CPD Monitoring Handbook, DMHAS CoC Rental Assistance requirements, CT BOS Policies, CT RRH Model Guidelines, and CT CAN Policies and Procedures. CT BOS requirements are only monitored for projects located in the CT BOS CoC. Standards have been strategically selected to enable a one-day monitoring visit. Projects are required to maintain compliance with all applicable HUD, DMHAS and CoC requirements, including those that are not monitored.
- **Pre-Visit Review:** At least four weeks prior to your monitoring date, HI will send details, including a list of documents that you are requested to submit in advance and a deadline and instructions for submission of those materials.
- **Entrance Conference**: HI staff will explain how the monitoring will be conducted, obtain all necessary documents, confirm times for staff and client interviews, answer any questions you have, and obtain other information needed to assess several of the monitoring criteria. You should determine who from your agency you would like to participate in the entrance conference.
- **Participant Chart Review:** Each site visit will include a review of current and discharged participant and applicant charts and other program documents.

- **Financial Review:** If the project includes a non-profit recipient or subrecipient of CoC funds, HI will conduct financial monitoring.
- **Staff and Client Interview:** A member of the monitoring team will interview a case manager or other direct care staff person and a client.
- **Exit Conference:** HI staff will be available to conduct an exit interview with the program director and/or other administrators and staff at the conclusion of the visit. During the exit interview, HI staff will provide preliminary feedback on the visit and request any clarifications needed. You should determine who from your agency you would like to participate in the exit conference.
- **Report:** Following the site visit, you will receive a written report detailing the results of the review.

Preparing for CT Continuum of Care Monitoring

Please carefully review the information provided below. It outlines the steps you will need to take in advance of your visit:

- **Submit Requested Documents:** At least 4 weeks prior to your visit, Housing Innovations (HI) will send you a Document Request form. Please be sure to complete that form and submit it along with all listed documents by the indicated deadline. Please coordinate as necessary among your project partners, which may include, for example, the LMHA or other housing coordination agency, and one or more non-profit subrecipients or service providers to obtain all requested information from the agencies being monitored. Which agencies are being monitored was indicated in the notification you received.

- **Ensure Necessary Participant Documents will be accessible:** Each site visit will include a review of current and discharged participant and applicant charts and other program documents. Please coordinate as necessary among your project partners, which may include, for example, the LMHA or other housing coordination agency, and one or more non-profit subrecipients or service providers to ensure that HI will have electronic access to all client records on the day of your monitoring visit. Which agencies are being monitored was indicated in the notification you received. For remote monitoring, HI will provide you with a list of specific documents that will be reviewed at least 2 business days in advance of your monitoring date. This request will include:
    - records pertaining to approximately 5 participants currently enrolled in and/or recently discharged from the program, including at least one participant discharged in the past 12 months and one participant admitted in the past 12 months.
    - Applications, disposition records, and all related documents from at least one applicant denied admissions to the program in the past 12 months.
    - Records pertaining to any grievances and/or appeals submitted verbally or in writing from program participants in the CoC project being monitored during the past 12 months.
    - HI may seek to review additional charts/records as needed.
    - Specifically, which documents HI will review may vary, but those documents can include, for example:
        - ***Housing Coordination Records for the current and previous year****, e.g., leases/occupancy agreements, HAP contracts, owner assurances, rental assistance certificates, requests for lease approval, recertification letters,*

rent calculations, income documentation, participant notifications of their subsidy amount/tenant contribution/obligation to report changes, environmental reviews, rent reasonableness determinations, documentation of HQS and health and safety inspections, lead hazard information provided to participants, any approved exceptions received from DOH/DMHAS.

- ***Supportive Service Records for the past 12 months**, e.g.,: participant eligibility records (i.e., documentation of homelessness, disability, age and income if applicable), assessments of service needs, service plans, safety plans, authorizations for release of information, VAWA notifications, client bill of rights, case notes, documentation of moving-on assistance, discharge summaries and other information related to terminations, and aftercare records.*
- ***Application Records,** e.g., outreach records for applicants referred byt the CAN, applications, notification of acceptance/denial, reasons for any denials*
- ***Participant Grievance/Appeal Records,** e.g., all correspondence and other documents pertaining to any oral or written grievances/appeals filed by program participants in the past 12 months*
- ***Reasonable Accommodation Request Records,** e.g., all correspondence and other documents pertaining to any requests for reasonable accommodations filed by program participants in the past 12 months*

- **Indicate your preferred chart review method for remote visits:** Please complete the related section of the Document Request form. HI will send you the list of participant chart documents that you will need to provide at least 2 business days prior to your monitoring date. Your agency can opt to:
    - Provide the HI monitoring team with time-limited, remote access to your electronic client records either via **HMIS**; or
    - Provide the HI monitoring team with time-limited, remote access to your electronic client records either via **your agency's electronic case management system**.
    - If you opt to upload documents to HMIS, as soon as possible, each agency participating in monitoring must submit an HMIS Helpdesk request authorizing View Only access to client records for each HI team member participating in your visit. Your request should include:
        - ☐ the name and HMIS project ID for the project being monitored
        - ☐ the names of all HI team members participating in the visit
        - ☐ the dates for which you are authorizing the access -HI strongly encourages authorization to begin at least 2 business days prior to the monitoring date and to extend for at least 5 business days after the monitoring date. This enables us to test access in advance and for you to upload and us to review, after the visit, any documents that may have been missed in your initial upload.

- Please copy the HI team on the Helpdesk request so that we can follow up as necessary to ensure access is granted prior to the monitoring date.

- **Make Arrangements with your Fiscal Department:** If the project includes a non-profit recipient or subrecipient of CoC funds, HI will conduct fiscal monitoring. This will require a review of the non-profit agency's fiscal records, including the most recent complete annual audit, LOCCS Vouchers, staff time sheets (for staff paid through the HUD CoC contract), payroll records, personnel activity logs, and other reports and transactions from the agency's fiscal management system. A member of your staff familiar with reports and transactions in the fiscal system will need to be available to meet with HI and assist in locating and sharing spending, back up documentation other documents and reports.

- **Schedule the Staff and Client Interview:** A member of the monitoring team will interview a case manager or other direct care staff person and a client. You may select the interviewees and HI will work with you to schedule those interviews between 11:00 am and 2:30 pm.

- **Assign a Staff Point of Contact:** During the visit, HI staff may have questions or requests for additional documents. It would be helpful, if a staff person from your project could be available by phone on the day of the visit to respond to inquiries.