

CoC Monitoring – What's New in 2023



Connecticut Balance of State Continuum of Care

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

Presented by:
Lauren Pareti, Housing Innovations



Agenda

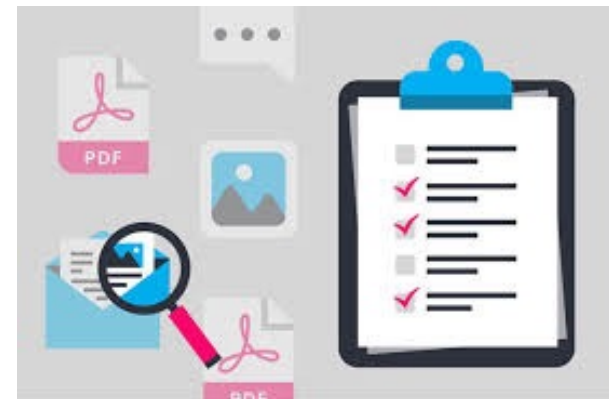
- Background
- What's new in 2023
- How to get your questions answered



Background

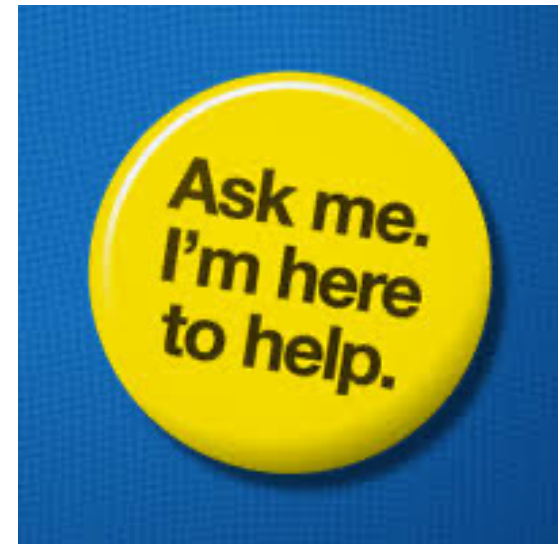
Background

- 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.
 - ✓ 4 CoC Rental Assistance Projects Slated for 2023 Monitoring

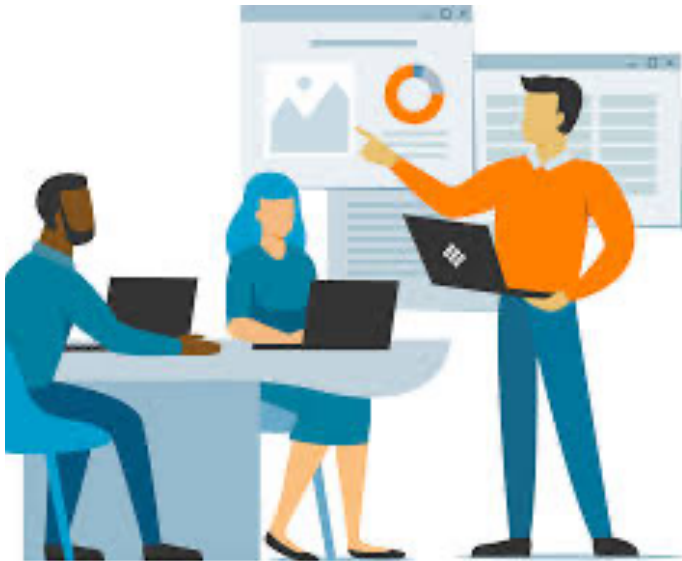


Monitoring Goals

- Help projects to understand and follow federal, state, and CT BOS 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



2022 Monitoring Webinar



For more information about monitoring see:

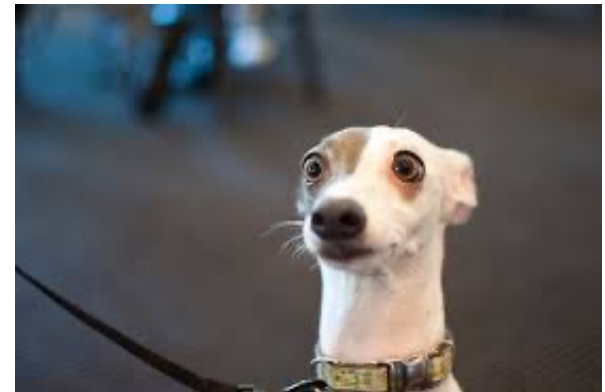
[CoC Monitoring Webinar Slides 2022 – PDF](#)

Video Recording:

• <https://youtu.be/iUpnPfICGVQ>

CoC Monitoring Guide - No Surprises!

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



CH-CH-CH-CHANGES!

Changes to Monitoring in 2023



More Training, Less Monitoring

REDUCED NUMBER OF VISITS
ENABLES RESOURCES FOR
ADDITIONAL TRAINING

New Section in Monitoring Guide: Emergency Preparedness and Response



Agencies required to have an **Emergency/Disaster Preparedness and Response Plan** that includes:

- A risk assessment to identify the potential crises on which to focus
- Plan to coordinate with relevant partners (e.g., public health, emergency management, etc.)
- Emergency Protocols to minimize the impact and loss & ensure that time-sensitive and critical services can continue or be quickly resumed
- Plan to communicate with staff, clients, volunteers, board, funders, partners, public during an emergency

New – Emergency Preparedness and Response (2)

Plan must also include:

- Steps & timeline for post-crisis evaluation and plan revisions
- Protocols for training staff on executing and following the plan



ARE YOU PREPARED?

New – Infection Control & Public Health Emergencies



Has the project incorporated into its approach to infection control and response to public health emergencies:

- Maintenance of operations to ensure continuation of critical services
- Coordination with local public health partners
- Monitoring of the situation and distribution of critical information to staff & clients
- Adjusting job duties and providing self-care resources to staff

New – Infection Control & Public Health Emergencies(2)

In addition:

- Risk reduction protocols, symptom screening & testing in accordance with guidance from public health authorities
- Efforts to build vaccine confidence among participants & staff
- Coordination with public health partners to ensure vaccine prioritization for high-risk participants and staff and convenient vaccination opportunities



Emergency Transfer Notice

Required under the Violence Against Women Act (VAWA)

Participants experiencing domestic violence, dating violence, sexual assault, stalking, or human trafficking can transfer to a different housing unit for safety reasons if:

- They reasonably believe they are at imminent risk of violence if they remain in their current unit
- If a sexual assault happened in the unit or on the property within 90 days of the transfer request

[CT BOS Emergency Transfer Plan](#)



Emergency Transfer Notice (2)

All CANs and CoC/ESG funded projects are required upon application, at project entry, and at annual recertification to:

- Inform all individuals/families seeking or receiving assistance, regardless of known DV survivor status, of their rights under the emergency transfer plan and of the process to seek a transfer.
- Provide a brief user-friendly notice that clearly explains the emergency transfer rights and process

NEW DOCUMENT: [Info for Residents - Emergency Transfer Plan](#)





Proposed: Grievance Notice

CoC projects and Coordinated Access Networks (CANs) required to:

- 1) Document provision of notice to all households seeking or receiving help upon application, at project entry and at a minimum annually; and
- 2) Review the notice to help people understand their grievance rights.

Pending Steering Committee approval - will be:

- Announced via CT BOS listserv
- Posted to www.ctbos.org/resources

Coming Soon: Updated Client Bill of Rights



CT BOS Rights Notices - Acknowledgement of Receipt (Coming Soon)

Sample form to obtain participant sign-off for the following CT BOS Notices:

1. Client Bill of Rights
2. Emergency Transfer
3. Grievance

Pending Steering Committee approval - will be:

- Announced via CT BOS listserv
- Posted to www.ctbos.org/resources



Providers can opt to use a different method to document notification.

Participant Chart Documentation

Requirements by Project Type - Updated

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/ <u>DivRE</u>)	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 & <u>DivRE</u> Only	X YHDP Crisis Housing Only	X

Record Retention Reminder



All records pertaining to CoC funds must be retained as follows:

Federal Requirements

- Minimum of 5 years
- Participant eligibility documentation must be maintained for 5 years after the end date of the last grant period under which the participant was served.

DMHAS advises

- Minimum of 5 years from the end of the relevant grant end date
- Participant eligibility documentation maintained forever



New: HMIS Access for Monitoring Team is Required

- Agencies may also provide access to certain client chart documents via your own electronic case management system.

New: HUD Notice on Risk Analysis

Notice [CPD-22-11](#) Implementing Risk Analyses for Monitoring

Key factors HUD uses to assess risk and select for monitoring include:

- Inaccurate and/or untimely reporting
- Multiple subrecipients
- Staff turnover
- Total cumulative grant awards for recipient of more than \$2.17M
- Leasing or rental assistance award greater than \$400K



New: HUD Notice on Risk Analysis (2)

Additional key factors HUD uses:

- Failure to draw from eLOCCS by quarterly deadlines
- Previous monitoring findings or no monitoring in past 3 grant years
- Untimely submission of audits or presence of audit findings/recommendations
- Negative media exposure or complaints



Questions & Suggestions



For general information:

CT BOS CoC Team- ctboscoc@gmail.com

For questions specific to CT BOS or DMHAS monitoring:

Lauren Pareti - lpareti@housinginnovations.us

For questions specific to DMHAS monitoring:

Alice Minervino - alice.minervino@ct.gov