CoC Monitoring 2024

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Agenda

- Background

- What to Expect During Monitoring

- Monitoring Guide Changes

- Avoiding Common Monitoring Findings

- Addressing Findings

- Preparing for HUD Monitoring

- Final Suggestions & Questions

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. In 2024:
  - ✓ 4 agencies selected by DMHAS
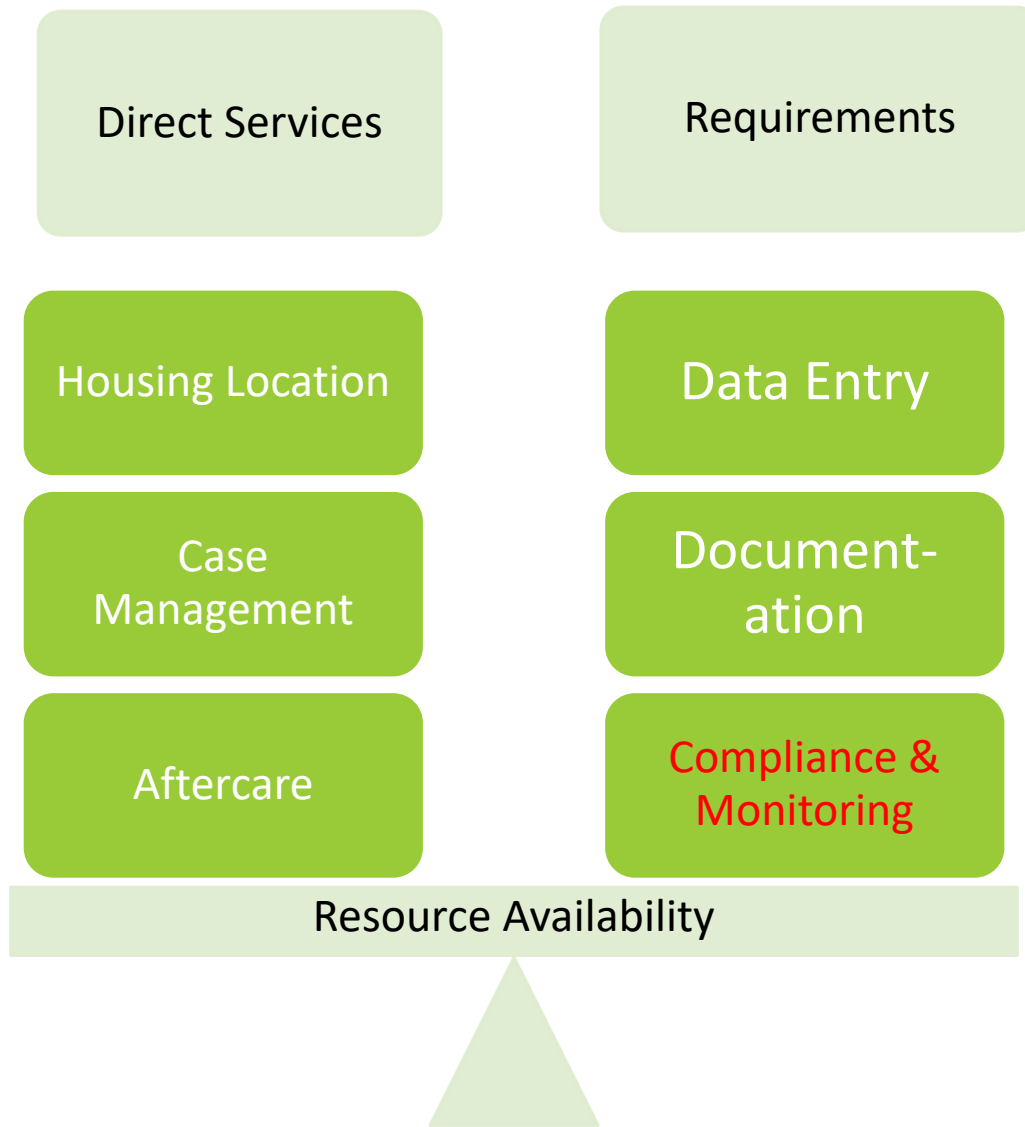 - ✓ 4 agencies selected by CT BOS
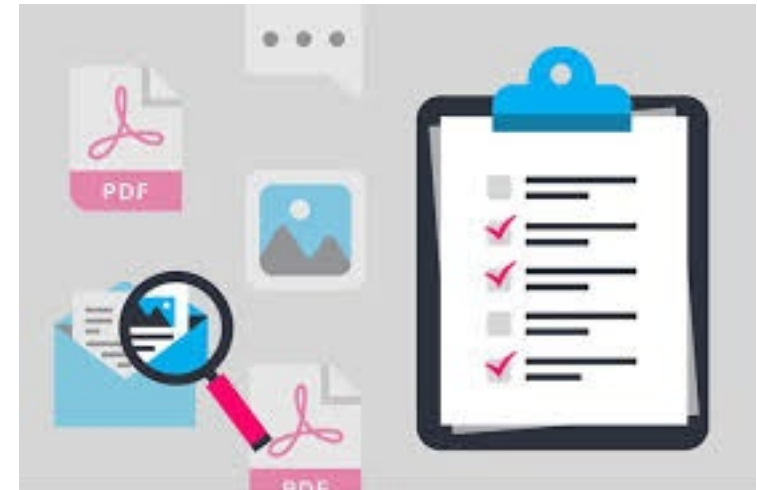
Monitoring Goals

- 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

Don't Fear the Finding!

- CoC Program requirements are complex.

- Findings are very common.

- The goal is to know what needs to be adjusted and make the necessary changes.

- Monitoring is an opportunity to course correct.

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

Resource Availability

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

- 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)

- 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, State or CT BOS requirements

What to Expect During Monitoring

CoC Monitoring Guide - No Surprises!

- Compiles federal, state, & CT BOS 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

Remote Monitoring

- All visits will be remote.

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

- HI will send a list of client records to be reviewed at least 2 days prior to the monitoring date.

HMIS Access for Monitoring

- Agencies must authorize HMIS view only access for the monitoring team.

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

Zengine

- BOS Grants Management Database
- Providers will submit Monitoring documents through Zengine.
- More information available on the CT BOS Zengine webpage

Written Policies & Administrative Requirements

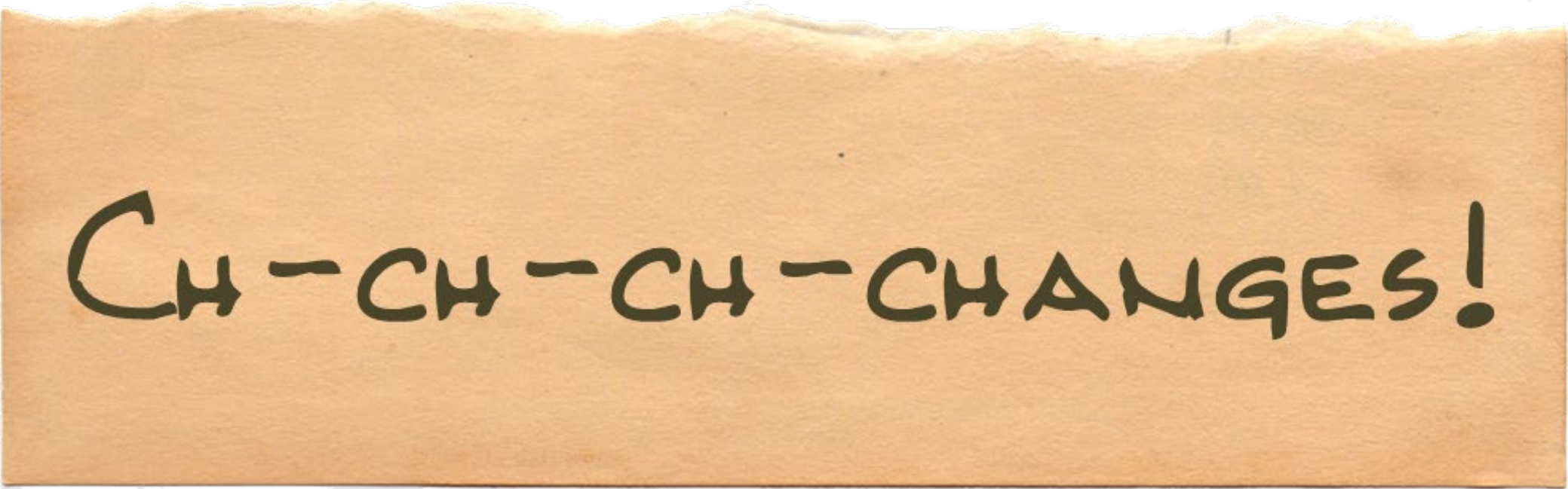If your agency has had a previous CoC Monitoring, you need **_only_** submit:

- 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 monitoring 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.

Zoom Poll

- Which of these are reasons why CT BOS monitors projects:
  A. So that CT BOS can recapture funds.
  B. Helps agencies to understand the requirements & prepare for HUD monitoring
  C. Fulfills a HUD requirement

- True or False: A project will not receive the standards used for monitoring until the day of the remote visit.

- True or False: A project that has a lot of monitoring findings will automatically lose its funding.

Changes to Monitoring Guide in 2023 & 2024

Permanent Supportive Housing (PSH) Requirements and Operations Guide

- NEW: Requirements are now standardized for all PSH.
  - PSH projects funded directly by HUD (not through DMHAS) must follow the requirements outlined in the Guide.

NEW: Security Deposit Refunds

- Document condition of the unit at move-in (e.g., photos in the chart)

- Document exit inspection to assess any damage caused by the Participant

- Property Owner may, subject to applicable State and local laws, use the security deposit as reimbursement for unpaid tenant rent or damages in accordance with lease

- Property Owner must promptly refund the full amount of the balance with interest – request in writing and include name/address to send the refund
  o DMHAS Projects: Owner must return balance to DMHAS
  o RRH Projects: Owner must return balance to Participant

- For more information see the CT Judicial Branch page on rental security deposits.

New: PSH Participants with High Income

- PSH providers must assess need and preference for ongoing case management prior to termination when a participant no longer qualifies for a rental subsidy.

- DMHAS projects should contact DMHAS Housing and Homeless Services Unit prior to re-certifying such a participant.

- Supervisors at other types of PSH should determine if to continue services.

NEEDS
ASSESSMENT

New: DMHAS SNOFO PSH Disability Definition

- Broader HUD definition of disability applies to DMHAS PSH funded through the SNOFO.

- SNOFO projects are not limited to serving people who meet the DMHAS disability definition.

dmhas
CT Department of Mental Health & Addiction Services

2022 Special NOFO: Address Unsheltered & Rural Homelessness

New Section in Monitoring Guide:
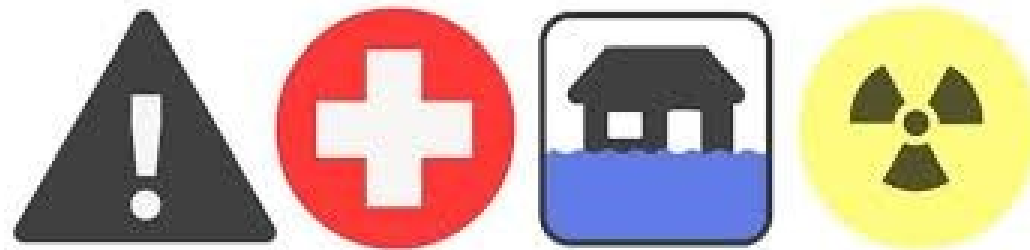# Emergency Preparedness and Response

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 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

CT BOS Emergency Transfer Plan

Required under the Violence Against Women Act (VAWA)

Participants experiencing domestic violence, dating violence, sexual assault, stalking, or human tracking 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

New: Emergency Transfer Notice

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: 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.

Webinar on CT BOS Grievance Process: Slides, Recording

Updated: Participant Bill of Rights

New: CT BOS Rights Notices - Acknowledgement of Receipt

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

1. Participant Bill of Rights

2. Emergency Transfer

3. Grievance

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

Zoom Poll:

- True or False: When a participant's income is too high to qualify for a rent subsidy, they must be discharged from a PSH project.

- Which of these CT BOS Rights Notices are projects required to provide to all participants:
  - Participant/Applicant Bill of Rights
  - Emergency Transfer Rights
  - Voters' Rights
  - Grievance Rights

Avoiding Common Monitoring Findings

Required Forms & Documentation Checklists

Forms:

- DMHAS CoC Rental Assistance Documents

- DOH Rapid Rehousing Documents

Both are on CT BOS Website Resources Page

Checklists:

DMHAS CoC Rental Assistance:

Required Documents Checklist

RRH

1 – CT RRH File Checklist

All CoC Projects

Participant Chart Requirements by Project Type

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

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
Street Outreach	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 Tools

Updated February 2023:

- CT BOS Homelessness Verification Form

- Disabling Condition CT BOS CoC Form

- Sample Letters from Shelter & Outreach

- Self Certification Overview (updated 4/13/23)

- Sample Letters Documenting Dedicated Plus (updated 1/11/21)

- Sample Project Intake Policy (updated 11/23/20)

- YHDP Eligibility Tools (Updated 7/28/22)

Eligible Costs	Approved Costs
All costs included in the CoC Program interim rule	• Each project has approved budget line items
	• Recipients may only spend CoC Program funds on approved costs
	• 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:

- See Fiscal Requirements Webinars (2 Sessions) on Training Page

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 other backup e.g., case notes, maintenance logs, etc.).

- Time sheets must reconcile to activity logs.

- Sample personnel activity log

Addressing Findings

Steps to Address a Finding

1. Review internally to identify what caused the issue. Examples:
   - Agency policies and procedures not sufficient
   - Staff not trained on policies and procedures
   - Knowledge not transferred when staff turned over
   - Staff need more supervision & support

2. Determine the scope and severity of the issue.
   - Puts clients or staff at risk?
   - Isolated mistake vs. systemic issue?
   - Involves fraud, waste, or abuse?
   - Recapture risk?

Steps to Address a Finding (2)

3. Establish a plan to prevent it from happening again– do this for all findings.
   - Include specific action steps, who is responsible and a target date for each action.
   - Submit a Monitoring Follow Up Plan to CT BOS as required (typically only required for recapture risk)

4. Implement your plan
   - Prioritize the most serious issues

5. Check in with your team quarterly to evaluate progress & adjust the plan

Preparing for HUD Monitoring

Amended: 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 capacity (e.g. vacancies for > 6 months, unresponsive)

- Staff turnover

- Total cumulative grant awards for recipient of more than $2.17M

- Leasing or rental assistance award greater than $400K

Amended: HUD Notice on Risk Analysis (2)

Additional key factors HUD uses:

- Failure to draw from eLOCCS by quarterly deadlines

- Previous monitoring findings

- No monitoring in past 3 grant years

- Untimely submission of audits or presence of audit findings/recommendations

- Negative media exposure or complaints

HUD Monitoring Desk Guide

HUD CPD 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

What items from today's training will you follow up on?

PUT IN CHAT OR UNMUTE TO SHARE

Final Suggestions & Questions?

CT Balance of State Continuum of Care (CT BOS CoC) Onboarding Resources

Onboarding Recommendations for New Staff

Onboarding Webinars available on CT BOS Training Page:

- Introduction to CT BOS CoC – Coming Soon: 1/11/24
- Key Policies & Administrative Requirements –Coming Soon: 1/24/24
- Participant Eligibility Documentation - Feb 2023
- Housing Requirements– 2 Sessions, May 2023
- Fiscal Requirements – 2 Sessions, June 2023
- Grant Management Requirements, Nov 2024
- DMHAS Training Catalog

Rapid Rehousing (RRH) & Permanent Supportive Housing (PSH) Requirements

- CT Statewide RRH Operations Guide

- CT Statewide PSH Operations Guide

- Visit CT BOS Training Page for related trainings

- Visit CT BOS Resources Page for required forms

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