Overview of CT Continuum of Care Monitoring

2027 Monitoring

Why monitoring happens

HUD requires Continuums of Care (CoCs) to monitor their funded projects and requires recipients of CoC funds to monitor their subrecipients. Each year, the Connecticut Balance of State CoC (CT BOS) and the Connecticut Department of Mental Health and Addiction Services (DMHAS) monitor a subset of CoC projects to:

- help projects prepare for HUD monitoring and reduce the risk of HUD recapturing funds,
- support compliance with DMHAS and CT BOS requirements, and
- identify technical assistance and training needs.

Most projects selected are in CT BOS. DMHAS also monitors its projects in the Opening Doors Fairfield County CoC.

Housing Innovations (HI) conducts monitoring on behalf of CT BOS and DMHAS, typically remotely.

> **Questions?** Contact the HI staff member leading your visit: lpareti@housinginnovations.us, shannon@housinginnovations.us, or saraz@housinginnovations.us. We welcome suggestions for improving the process.

What we monitor

Monitoring follows the **2027 CT CoC Monitoring Guide**, which draws on:

- HUD CPD Monitoring Handbook
- CT PSH Requirements & Operations Guide
- CT Statewide RRH Operations Guide
- CT BOS Policies (applied only to projects in CT BOS)
- CT Coordinated Access Network (CAN) Policies and Procedures

Standards are selected so the review fits in one day. Some visits are abbreviated to focus on items that pose a recapture risk or significantly affect service quality.

> **Projects must comply with all applicable HUD, DMHAS, CT Department of Housing (DOH), and CoC requirements, including those not monitored.**

The monitoring day

Time	Activity	Who should attend
9:00–10:00 am	**Entrance Conference** — HI explains the process, confirms documents and access, answers questions, and interviews senior staff to obtain needed information	Program director and others with oversight responsibility (required); additional staff optional
10:00 am–4:00 pm	**Record review and interviews** — participant and applicant charts, financial records, staff and client interviews	Fiscal staff as scheduled; point of contact available by phone
4:00–5:00 pm	**Exit Conference** — HI shares preliminary feedback and requests any needed clarifications and additional documents	Program director and others with oversight responsibility (required); additional staff optional

See "After the visit" below for the report and follow-up process.

How to prepare

When	What to do
On notification	Note which agencies and projects are being monitored (listed in your notification). Assign a staff point of contact. Begin coordinating with project partners, e.g., the local mental health authority (LMHA) or housing coordination agency and any nonprofit subrecipients or service providers.
As soon as possible	Confirm the monitoring date with staff, partners, and HI. Submit a Homeless Management Information System (HMIS) Helpdesk request for HI's view-only access (see "How HI will access participant records" below). If you choose to give HI access to your agency's Electronic Health Record (EHR) system, coordinate with your IT staff to set it up.
At least 4 weeks before the monitoring date	HI sends a Document Request form with instructions and a deadline. Complete the form, including your preferred chart review method, and submit all listed documents by the deadline.
Before the monitoring date	If financial review applies, arrange for fiscal staff to meet with HI. Select a case manager or other direct care staff person and a client for HI to interview. HI will propose times and send calendar invites for the fiscal review and interviews.
2 business days before the monitoring date	HI sends the list of specific participant documents to be reviewed.

When	What to do
By 5:00 pm the day before the monitoring date	Make sure all requested participant documents are uploaded and accessible to HI.
Monitoring day	Have your point of contact available by phone for questions and additional document requests.
Within 2 business days after the monitoring date	Upload any documents missed in the initial upload and anything additional requested by the monitoring team.

How HI will access participant records

HI reviews participant and applicant records remotely, through view-only access to your project's client records in HMIS and, if you choose, your agency's EHR. Here is how it works:

1. **Choose your review method.** On the Document Request form, tell HI whether records will be reviewed in HMIS only, or in HMIS plus your agency's own EHR. HMIS access is required either way.
2. **Request HMIS/EHR access.** Each agency being monitored submits an HMIS Helpdesk request authorizing view-only access for each HI team member on your visit (details below). If you choose to give HI access to your agency's Electronic Health Record (EHR) system, coordinate with your IT staff to set it up.
3. **HI sends the review list.** Two business days before the monitoring date, HI identifies the participants and applicants selected for review and the specific documents it needs to see.
4. **You upload the documents.** By 5:00 pm the day before the monitoring date, make sure each listed document is uploaded to the participant's record in HMIS (or available in your EHR, if you chose that option). Scan and upload any records kept on paper or outside of HMIS/EHR.
5. **HI reviews the records.** On the monitoring day, HI reviews the records remotely.
6. **Follow-up uploads.** Within 2 business days after the monitoring date, upload anything missed in your initial upload or requested. HI's access remains open so it can review these uploads.

Your HMIS Helpdesk request must include:

- the project name and HMIS project ID,
- the names of all HI team members on the visit, and
- the access dates, beginning **at least 2 business days before** and ending **at least 5 business days after** the monitoring date, so HI can test access in advance and review new uploads.

Copy the HI team on the request so we can follow up if needed.

EHR access: Consult with your IT team to determine what is required.

> **DV providers:** If you are prohibited from using HMIS, HI will work with your team to arrange an alternative way to review records.

Financial review

If the project includes a nonprofit recipient or subrecipient, HI will review fiscal records, which may include the most recent complete annual audit, fiscal policies and procedures, LOCCS vouchers, timesheets and payroll records for staff paid with CoC funds, personnel activity logs, and other reports from your fiscal system.

Records HI may review

HI will review records for about **5 current or recently discharged participants**, including at least one admitted and one discharged in the past 12 months, plus records for **at least one applicant denied admission** in the past 12 months, if applicable. HI may request additional records. Examples:

Record type	Examples
Housing coordination	Leases/occupancy agreements; HAP contracts; owner assurances; rental assistance certificates; requests for lease approval; recertification letters; rent calculations; income documentation; participant notices of subsidy amount, tenant share, and duty to report changes; environmental reviews; rent reasonableness determinations; unit inspection records; lead hazard information provided to participants; approved DOH/DMHAS exceptions; security deposit return records
Supportive services	Eligibility documentation (homelessness, disability, and age and income if applicable); service needs assessments; service plans; safety plans; releases of information; VAWA notices; evidence of the required CT BOS participant rights notice; case notes; moving-on assistance; discharge summaries and termination records; aftercare records
Applications	Outreach records for CAN referrals; applications; acceptance/denial notices; reasons for denial
Grievances and appeals (past 12 months)	All related correspondence and documents
Reasonable accommodation requests (past 12 months)	All related correspondence and documents

After the visit

Monitoring ends with a final report and, when required, a Follow-Up Plan from your agency.

Step	What happens
1. Review the draft report	HI sends you a draft report of the monitoring results. Review it and send HI any comments by the deadline provided with the draft (typically 10 business days).

Step	What happens
2. Final report	HI incorporates your comments and issues the final report.
3. Submit a Follow-Up Plan	**Due within 30 days of the final report date.** The plan describes how your agency will address the findings identified in the report. A Follow-Up Plan is typically required only for findings that pose a recapture risk or significantly affect client services, and for findings that remain unresolved across multiple monitoring cycles.

Thank you for your work to end homelessness in Connecticut. We look forward to learning more about your project.