



Oakland County
Alliance for Housing

CoC HUD Program Monitoring Instruction Guide

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Introduction

As a Continuum of Care, The Alliance for Housing (Alliance) must establish and maintain standard operating procedures for ensuring the CoC Program funds are used within the accordance with the requirement established in 24 CFR Part 578. All CoC funded programs must be monitored for compliant with federal regulations, rules, guidelines, CPD Notices and should adhere to national best practices.

The intention of the Alliance's monitoring process is to evaluate and access all CoC funded programs in the following areas:

- Program performance
- Data quality
- Quality assurance
- Improvement strategies

All CoC funded programs are required to operate in alignment with all CoC and HUD standards. Annual monitoring will support our overall goal of producing a high quality and effective Continuum of Care program, that meets our mission to support housing solutions by promoting community partnerships.

Through monitoring, the Alliance will address and help resolve performance concerns related to policies, procedures and outcomes. The following documents contains a step by step procedure that has been streamlined to create a coherent and structured system.

If you have any questions on the following document please contact the following:

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CoC Program Monitoring Process Policy

Introduction

The purpose of the Alliance for Housing Continuum of Care Monitoring is to produce a high quality and productive Continuum of Care program by:

- Addressing and helping resolve performance concerns related to policies, procedures and outcomes.
- Evaluating CoC-Fund program data in efforts to improve data quality.
- Proactively assisting CoC funded projects with efforts to comply with the Department of Housing and Urban Development (HUD) regulations and established CoC standards.
- Providing guidance and Technical Assistance (TA) opportunities to all CoC-Funded projects
- Ensuring all CoC-Funded programs are being consistent in their service delivery and program implementation

Program Monitoring

The Alliance for Housing (the Collaborative Applicant), will establish and maintain standard procedures for ensuring that the Continuum of Care (CoC) Program funds are used in accordance with federal requirements and will establish and maintain sufficient records to enable HUD to determine where the recipient and its subrecipients are meeting the requirements of 24 CFR Part 578.

To support this role and responsibility, CoC Program monitoring activities will include programmatic management and compliance as outlined in 24 CFR Part 578 identified in this policy. HUD maintains responsibility for monitoring CoC recipients and this will include monitoring a sample of subrecipients when a recipient is selected for HUD program monitoring.

Communication Strategy

The Alliance aims to work collaboratively with monitored agencies and will provide clear communication and expectations throughout all components so that activities can be successfully fulfilled. The Alliance will schedule a date and time for the monitored agencies that fits with schedules of the agency and the CoC.

Program Selection

Monitoring Selection: The Alliance will monitor all CoC funded programs on an annual basis. In the start of April Alliance will send out, via email, a scheduling platform to aid in finding dates and times that work for each agency. If an agency has a conflict with the selected dates please email Ashley at aburton-alliance@oaklandhomeless.org.

Methods

The Alliance will utilize three monitoring tools, a current APR of the program, and will conduct one Program On-site Visit. The 3 monitoring tools consist of a: Grant Overview Questionnaire, Desk Audit Tool and Agency Evaluation Tool.

Remote Monitoring Tools:

- **Grant overview Questionnaire:** Each project will start the monitoring process by completing a grant overview questionnaire containing questions that will cover the history of the grant, special populations served, family or individual project, project-based or scattered site, and other funding sources. If an agency has been awarded with more than one grant type (RRH, TH, PSH) a separate questionnaire will need to be completed for each type of project. A copy of the questionnaire can be found under the CoC monitoring section of the Alliance's website
- **Agency Evaluation Tool:** The agency evaluation tool is an opportunity for the project to reflect on performance and challenges related to practices that are priorities in our community. It is an opportunity for the agency to self – evaluate their project and discuss areas in which they would like to request technical assistance (TA). Topics covered in the agency evaluation tool include homeless and chronic homeless definitions, recordkeeping, coordinated entry, enrollment, housing, eviction prevention, data collection, staff development, service provisions, and grant management. Question types include narratives, checkboxes, Yes/No, and rating scales. The self-assessment also provides an opportunity for the project to identify additional TA needs related to performance. The Self-assessment PDF form is available under the CoC monitoring section of the Alliance's website.

On-Site Visit

All CoC funded agencies will be scheduled for an on-site visit on an annual basis. Alliance will send out, via email, a scheduling platform to aid in finding dates and times that work for each agency. CoC staff will be in attendance. Any pertinent agency staff is requested to be present during an on-site visit. The following is a sample agenda on a typical On-site Monitoring Visit

Agenda

1. Welcome and Introductions
2. Monitoring Expectations
3. Collection of any missing requirements or documentation
4. Program Site Tour
5. Data Privacy and Security Check
6. Program Client File Review
7. Closing

The schedule and projects that will be reviewed on a one-site visit can be found on the 2023 CoC Program Monitoring Schedule after dates are picked.

The following are 3 key components of an on-site visit

1. Data Privacy and Security Check

While onsite the CoC Staff & HMIS team will check that all client's files (physical or electronic) are being properly secured and meet specific Confidentiality and Security Requirements for HMIS data. Physical records shall be kept in individual locked files or in rooms that are locked when not in use. Records in use (i.e. on the desktop) shall be maintained in such a manner as to prevent exposure of information to anyone other than the user directly utilizing the record. Electronic files will be checked for password protection and passwords should be secured and not shared. The HMIS team will be sending out documents prior to the onsite visit in preparation for their portion of monitoring. For more information regarding HMIS data Privacy and Security please reference the HUD Alliance Site Review provided by the HMIS team. If you have any specific HMIS related questions please reach out to HMISHelp-alliance@oaklandhomeless.org

2. Program Client File Review

The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services. A cross reference between the physical files and HMIS databased is performed for areas such as: consent, enrollment, move-in dates, housing status and income. When selecting participant files, the Alliance will choose 10% of the program participants per program. To prepare for the program file review, an agency may reference the Documentation and Record Keeping Review Checklist and On Site CoC Program Monitoring Tool.

3. Monitoring Summary Report

The Alliance will create and send via email a summary report. The following could be found in a Monitoring Summary Report

- a) A *concern* is a deficiency in program performance and may result in a finding if the concern is not corrected by the requested date stated in the summary report.
- b) A *finding* is a deficiency in program performance based on material non-compliance with a statutory, regulatory, or program requirement of which sanctions or corrective actions are authorized. A *finding* depending on the nature may be immediately reportable to HUD, or invoke other sanctions as defined by 24 CFR 578, a Continuum of Care responsibilities.
- c) The Monitoring Summary Report will address all concerns with a list of action(s) and measurable goals to correct the problem(s) within a reasonable timeframe.
- d) The CoC reserves the right to request immediate corrective action for housing quality standards issues, or other issues that may affect the

health and safety of consumers, and reserves all rights under federal law in regards to legal compliance.

Results

If during the on-site visit a concern, finding, and/or recommendation has been identified, it will be noted on the agency's Summary Report. As stated above, the Monitoring Summary Report will address all concerns with a list of action(s) and measurable goals to correct the problem(s) within a reasonable timeframe. The Alliance may also address areas in which there are not requested actions, but where recommendations may be made to help strengthen policies or procedures. If needed the agency will be asked to complete corrections by a specific date. The Alliance will review the updates at that time and advise the agency if a significant item of noncompliance remains. Agencies will not be required to resubmit documentation, but the agency may request further review of updated policies and procedures.

Technical Assistance

Types of technical assistance may include formal or informal discussions, referrals to training, HMIS assistance, special/tailored training sessions, referrals to written technical assistance articles or resources, feedback on drafted or revised policies, and referrals to other content experts within or outside of Oakland County's CoC. The process of completing monitoring components and receiving results from the Alliance is also considered technical assistance due to the potential for agencies to develop additional understanding of requirements and practices by participating.

Step by Step Procedure

1. CoC Program Monitoring Notice

- CoC staff will send a monitoring notification with a scheduling platform to subgrantees for on-site monitoring
- Agencies shall begin preparing responses and gathering requested documentation for all 3 monitoring tools due before on-site visit

2. CoC Program Monitoring Start Date Window

- Start of CoC Program Monitoring Window. CoC Program Monitoring Window is approximately 30 days
- All 3 monitoring tools are due via email before the scheduled onsite visit, based on the agency's selected date and time.

3. CoC Program Evaluation

- CoC Staff will evaluate tool submissions and will review HMIS related documents.

4. On Site Monitoring Visit

- CoC Staff Members will meet with agency staff on site to complete a targeted file review and Data Privacy and Security Check
- On-Site Visits are scheduled within the last two weeks of the monitoring window

5. CoC Program Monitoring Closing

- After the on-site visit a CoC staff will send out closing remarks and a Monitoring Summary Report.