




VERMONT COALITION TO END HOMELESSNESS (VCEH - VT BOS COC – VT-501)

BALANCE OF STATE CONTINUUM OF CARE

POLICIES AND PROCEDURES MANUAL

<p><i>HUD Continuum of Care # and Name:</i> VT 500 - Vermont Balance of State CoC</p>	
<p><i>VT BoS CoC Primary Decision-Making Body:</i> Vermont Coalition to End Homelessness (VCEH)</p>	
<p><i>Policy/Procedure:</i> CoC Program Project Monitoring</p>	
<p><i>VT BoS CoC approved/revised:</i> 9/12/2018, 9/17/2019</p>	

Purpose

The Vermont Coalition to End Homelessness (Vermont Balance of State CoC (or VT BoSCoC) is committed to monitoring Continuum of Care (CoC) Program funded projects. Monitoring how housing and services projects are performing provides VT BoSCoC with the information needed to improve the way resources are allocated and services are delivered. Monitoring is critical to being accountable in our efforts to end and prevent homelessness. It should also improve the continuum of care for individuals and families who are experiencing homelessness or are at risk of becoming homeless.

This policy will establish who will be responsible for monitoring CoC Program-funded projects, how often monitoring will occur, what data sources will be used to report performance, how outcomes will be measured, and resources provided to underperforming projects. It will also ensure the CoC has accurate and timely information about the projects, organizations, services and processes that play key roles in making homelessness in Vermont rare and brief.

Principles

- This is not a once a year or periodic exercise but an on-going process of feedback, adjustments and communication.
- The goals are project compliance and success and to assist recipients and subrecipients in carrying out their project.
- Accomplishments, successful techniques and best practices should be recognized. By operating under the basic belief that a team approach to problems solving is in the best interest, we will work together to explore options and develop mutually agreeable solutions.
- We operate in an environment of mutual respect and treating all persons fairly.
- Effective communications is a key factor in facilitating a good relationship and positive outcomes; we are committed to keeping lines of communication open.

Policy

Monitoring of projects receiving Continuum of Care funding is a multi-layer process.

- Recipients and subrecipients should monitor themselves internally
- Recipients monitor subrecipients
- The CoC monitors recipients and recipients can include subrecipients as necessary
- HUD monitors recipients as needed

The Federal Department of Housing and Urban Development (HUD) Continuum of Care Program Interim Rule 24 CFR Part 578 requires that the CoC consult with recipients and subrecipients to establish performance targets appropriate for population and project type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performance. This policy was developed to ensure a procedure for on-going evaluation and monitoring of projects recommended for CoC Program-funding in the VTBoSCoC.¹⁰ The MOA between VSHA, AHS and ICA include duties related to the CoC function and includes Vermont Coalition to End Homelessness (VCEH) (VT BoSCoC) as the responsible entity for monitoring.

The policy also serves to assist recipients and subrecipients in improving project performance, increasing their organizational capacity and technical compliance with the CoC Program. Lastly, this policy will assist the VTBoSCoC in providing recommendations and information to funding agencies to include but not limited to: US Department of Housing and Urban Development (HUD) and State of Vermont Office of Economic Opportunities (OEO). The VTBoSCoC and the State of Vermont Office of Economic Opportunity, the Emergency Solutions Grant (ESG)ESG recipient, consult on funding priorities, recipient and subrecipient reporting and evaluation, coordinated entry and HMIS for the ESG Program.

¹⁰ 578.7 (a) (6)

Levels of Monitoring

Self-Monitoring

Recipients and subrecipients should institute regular self-monitoring to check for compliance with all requirements. Self-monitoring should include monitoring for performance and assessing compliance with policies, including file review to verify appropriate documentation is being maintained. Self-monitoring can identify potential issues and allow the recipient or subrecipient to make corrections proactively in advance of external monitoring. Recipients and subrecipients may request assistance from the CoC and/or a peer project to resolve any self-identified issues.

Subrecipient Monitoring by Recipient

Recipients are required to monitor subrecipients at least annually for compliance with the CoC Program and subrecipient agreement terms. Recipients are required to establish a programmatic and financial monitoring plan of subrecipients that includes regular desktop review and onsite monitoring in accordance with OMB Uniform Guidance and HUD CoC Regulations. Recipients must keep documentation of subrecipient monitoring, including any findings and required corrective actions. Recipients may impose the same types of remedial actions and sanctions on subrecipients as HUD can impose on recipients.

Recipient Monitoring by CoC

The VTBoSCoC will monitor CoC Program-funded projects to ensure compliance with both federal and local goals. A CoC Monitoring Workgroup will be established and will consist of **members to be determined and voted on by the VT BoS CoC**. Monitoring will include project performance, project compliance, and system level performance.

PSH, RRH, Transitional Housing, SSO (non-CE) Project Monitoring

Project monitoring for compliance and performance for permanent supportive housing (PSH), rapid rehousing (RRH), transitional housing (TH), joint TH-RRH, supportive services only (non-CE) will be assessed once a year offsite and will occur in the beginning of the calendar year when possible. The **VT BoS CoC** will maintain electronic and/or paper records of monitoring visits for at least 5 years.

Projects that do not meet the established threshold, and/or meet fewer than half of the performance standards, will be considered “projects of concern” and will be required to develop a 12-month action plan for improving performance in the substandard area(s). Projects of concern will be required to provide at least semi-annual progress updates to the CoC Monitoring Workgroup on their project’s progress toward implementing their 12-month action plans, which may include in-person or phone meetings. The CoC Monitoring Workgroup will assess performance at the end of the 12-month period and determine if the projects are improving in the target areas, as well as assess performance in meeting local, state, and federal goals. If the CoC Monitoring Workgroup determines that project performance has not improved sufficiently then the project will be recommended to the CoC to be considered for possible funding reallocation or project repurposing during the annual HUD McKinneyVento CoC Program NOFA.

Coordinated Entry System Monitoring

As part of its CE Policies and Procedures, VCEH has established an evaluation policy for review of how effective CE implementation is achieving the goals of CE. The VCEH CE Committee reviews and presents an evaluation of CE to the VCEH Board as laid out in the CE Policies and Procedures. CE Project Policies and Procedures are developed by the CE Committee and approved by the VCEH Board. The CE Committee provides an annual report to the VCEH (CoC) Board on CE performance. The Office of Economic Opportunity, as the CE SSO Recipient, conducts monitoring of CE project subrecipients.

HMIS Monitoring

The Data Quality Subcommittee will develop a formal evaluation and monitoring process for HMIS. HMIS monitoring will be implemented by edits to the existing Memorandum of Agreement currently in place for VTBoSCoC. The process might include agency satisfaction surveys, ability and accuracy of mandated HUD reports, ability to provide reports for CoC planning as agreed upon in contract, and other measures as determined applicable.

CoC Monitoring Workgroup

The CoC Monitoring Workgroup provides oversight of CoC Program project monitoring and provides recommendations, training and assistance to the VCEH (VTBoSCoC) Board on CoC Program policy, requirements and performance. It will oversee the processes and methodologies used to monitor projects that intend to apply for renewal CoC Program funds through the CoC.

The workgroup will be selected by nominations from the CoC and will include at least 3 people. The workgroup will use two tools to score PSH, RRH, TH, Joint TH-RRH and SSO (non-CE) projects: the Monitoring and Evaluation Form and the Monitoring Threshold Tool. The Monitoring and Evaluation

Form will be completed by the CoC Program project recipient and reviewed by the CoC Monitoring Workgroup. The workgroup will use the Monitoring Threshold Tool to designate an acceptable or unacceptable answer to each question.

Roles and Responsibilities

Monitoring Workgroup

The overall responsibility for the monitoring of recipients receiving CoC Program funds remains with the VT BoSCoC Board but is designated in this policy to the monitoring workgroup. This group is charged with monitoring and evaluating all CoC funded projects to ensure compliance with project requirements, ensure projects are meeting performance measures set by the CoC, and take action against poor performers. The specific responsibilities are outlined above.

Project Ranking Committee

The Committee is provided with information about the performance of CoC Program-funded projects. Along with this information, this committee is responsible to review project applications and propose funding and ranking to the CoC.

Collaborative Applicant

The Collaborative Applicant's, as named in the governance charter, prime responsibility is to assemble

VT BoSCoC's consolidated application which includes a ranking process for of projects. As such, the Collaborative Applicant will also take the lead on desktop monitoring, working with the HMIS Lead Agency to provide data for the Ranking Committee as well as for the annual report card. The Collaborative Applicant will support the execution of monitoring process unless another entity is designated.

Recipients

Recipients, who are directly contracted with HUD, will be responsible to report on the progress of their CoC Program-funded projects at least annually and are responsible to respond to monitoring requests as appropriate. A recipient will also be responsible to respond to corrective actions.

Monitoring Timeline

1. All projects will be monitored annually during the beginning of the calendar year.
2. The project monitoring schedule will be kept by the VT BoS CoC Collaborative Applicant and be made available as requested by projects and interested parties.
3. A project will have 14 calendar days to respond in writing to the monitoring workgroup request.
4. The CoC Monitoring Workgroup will have 30 calendar days to review and request additional information from projects.
5. The projects will have 14 calendar days to submit additional information requested by the CoC Monitoring Workgroup.

Project Performance and Compliance Criteria

Annually, the Ranking Committee is provided with information about the performance of funded projects as determined on the renewal scoring tool approved by the CoC each year. This process and tool includes objective criteria, past performance data that improves participant outcomes and CoC's system performance including but not limited to:

- utilization rates, housing outcome measures,
- income and benefit links,
- serving vulnerable populations,
- participation in CoC systems,
- financial management,
- cost effectiveness,
- target populations and
- implementation of best practices.

Desktop Monitoring Materials

As part of the desktop monitoring each recipient will be provided a checklist requesting documentation which may include but is not limited to: executed grant agreement and amendments, any Memorandum of Understanding with subrecipients, debarment documentation subrecipients, any monitoring of subrecipients,

submitted Project Application, documentation of timely Annual Performance Report submittals, LOCCS drawdown history, written CoC Program Policies and Procedures to include intake/screening, personnel policies/procedures, termination policy, grievance policy, privacy/confidentiality policy, drug-free workplace policy, domestic violence policy, policy identifying the involvement of those with lived experience, environmental review, compliance with fair housing requirements, financial policies, procurement policies, conflict of interest policy, documentation of match, grant expenditures and quarterly draw requests.

System-level Performance Monitoring

System wide performance measures currently include the following: Length of Time Persons Remain Homeless; Returns to Homelessness; Number of Homeless Persons; Employment and Income Growth for Homeless Persons in CoC projects; Number of Persons who Become Homeless for the First Time; Successful Placement from Street Outreach and successful Placement in or Retention of Permanent Housing. The VT BoSCoC will review these system level performance measures at least annually with information provided by the HMIS Lead. The VT BoSCoC will consider other system-level performance measures.

In addition to reviewing data, performance, and outcomes, the VT BoSCoC needs to build agreement and formalize the ways we include and engage, as well as gather and utilize feedback from, the individuals, families and communities we serve. Once there is general agreement, appropriate ways to track and evaluate the impact as well as the effectiveness, efficiency and appropriateness of efforts and activities will need to be developed and implemented. This can also include an annual satisfaction survey to members and community partners.

Concerns/Deficiency/Noncompliance Notifications

Where an issue is identified that is in non-compliance with CoC Program rules or CoC Standards or is a possible trouble area, the information should include the condition, criteria, cause, effect, and required corrective action.

- a. The condition describes what was wrong or what the problem was.
- b. The criteria cite the regulatory or statutory requirements that were not met.
- c. The corrective action identifies the action(s) needed to resolve the problem, if applicable.

The monitoring letter should also provide timelines for response and corrections as noted above.

Actions for Identified Issues

Recipients will be provided with technical assistance towards resolution and improvement. It is the general policy of VT BoSCoC to allow at least one full grant cycle for resolution and improvement before any changes to funding are recommended, except in the case of extreme non-compliance.

Tools Used in Monitoring:

The following tools will be utilized for the monitoring as described in this policy. Each tool will be provided to the recipient.

- Project Monitoring Form
- System-level performance monitoring
- System-level annual report card
- Coordinated Entry System Monitoring

The CoC will review and approve of these tools before implementation.

Monitoring Procedure for PSH, RRH, TH, Joint TH-RRH and SSO (non-CE)

The roles and responsibilities of the CoC Monitoring Workgroup are as follows:

1. Develop and refine the Monitoring and Evaluation Form, and the methodology used to monitor and evaluate ongoing project performance.
2. Determine an annual threshold score for determining which projects may be considered “projects of concern” and require additional monitoring during the year.
3. Present the Monitoring and Evaluation Form and annual threshold score for approval by the VTBoSCoC Board prior to the start of the annual monitoring review.
4. Once approved the Monitoring and Evaluation Form is provided to all project types noted above who are currently receiving CoC Program funds, along with a request for the project’s most recent APR and any relevant policies.
 - a. Send the notice of the monitoring and requirements for completion via e-mail to the contact person of record and chief executive officer of the CoC Program project recipient.
5. Review all monitoring returns and determine if each project has adequately responded to each of the monitoring questions.
 - a. If workgroup members think that an answer is acceptable they will assign a "1" to the corresponding box in the Monitoring Threshold Tool table.
 - b. If workgroup members think that an answer is not acceptable, they will assign a "0" to that box
 - c. The CoC Monitoring Workgroup will create written criteria and submit for approval to the VTBoSCoC Board to make it clear when to assign a 1 or 0.
6. Notify projects by email of their deficiencies within 30 days of submission deadline and provide 14 days to respond with additional information.
 - a. The email address used will be the email written on the front of the Monitoring and Evaluation Form with a copy to the project organization’s Executive Director.
 - b. Projects will be given one opportunity to correct or amend their monitoring returns in order to address any deficiencies identified by the Workgroup.
 - c. The Workgroup will then meet again to decide if any new information provided adequately answers the question or addresses the deficiency, and will amend the table accordingly.
 - d. Within 14 days, the Workgroup will provide the project recipient a final monitoring report, including specific information on areas of strengths, noted deficiencies, an offer of training and/or technical assistance to support improvement, and a request for an action plan.
7. Provide a one-year probationary period for projects that fail to meet the threshold
 - a. Projects will be required to demonstrate improvement and submit an action plan and provide progress updates on implementation at least semi-annually.
 - b. The CoC Monitoring Workgroup will offer and/or refer agencies to appropriate technical assistance and training as available.
 - c. Deficiencies may be addressed through staff training and/or project policy changes.
8. Provide all monitoring results to the VTBoSCoC Board and CoC Project Ranking Committee.