


HUD Continuum of Care # and Name: VT 500 - Vermont Balance of State CoC	
VT BoS CoC Primary Decision-Making Body: Vermont Coalition to End Homelessness (VCEH)	
Policy/Procedure: CoC Program Project Monitoring	
VT BoS CoC approved/revised: 8/21/2018 (pending)	

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Purpose

The Vermont Balance of State CoC (VT BoS CoC) is committed to monitoring CoC Program funded projects. Monitoring how housing and services programs are performing provides CoCs 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.

The MOA between VSHA, AHS and ICA include duties related to the CoC function and includes Vermont Coalition to End Homelessness (VCEH)/(VT BoS CoC) as the responsible entity for monitoring. This policy will establish who will be responsible for monitoring, 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 programs, 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 program compliance and success and to assist recipients and subrecipients in carrying out their programs.
- 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 subrecipients
- 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 local CoC consult with recipients and subrecipients to establish performance targets appropriate for population and program 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 programs the VT BoS CoC recommends for funding. The VT BoS CoC will consult with the State of Vermont Office of Economic Opportunity (ESG recipient) on funding priorities, ESG/HOP (Housing Opportunity Program) grantees, coordinated entry and HMIS as part of the process. The policy also serves to assist recipients and subrecipients in improving their performance, increasing their organizational capacity or enhancing their management or technical skills. Lastly, this policy will assist the VT BoS CoC 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 Opportunity (OEO).

Process

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 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 AND SUBRECIPIENT MONITORING BY COC

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

Program monitoring for compliance and performance will be assessed once a year and will occur in the beginning of the calendar year when possible. The VT BoS CoC Collaborative Applicant 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 participate in semi-annual progress meetings with the CoC Monitoring Committee to assess their project’s progress toward implementing their 12-month action plans. The CoC Monitoring Committee 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 Committee determines that program performance has not improved sufficiently then the program will be recommended to the CoC to be considered for possible funding reallocation or project repurposing during the annual HUD McKinney-Vento CoC Program NOFA.

Coordinated Entry System Monitoring – The Coordinated Entry Subcommittee will develop a formal evaluation and monitoring process for coordinated entry. Coordinated Entry monitoring will be implemented under a Memorandum of Agreement between agencies participating in Coordinated Entry. This process might include an interim and annual data report on agreed upon measurements, site visits to agencies participating in the CES, and file reviews as applicable. The goal of Coordinated Entry evaluation is to review how effectively the Coordinated Entry process is achieving its goals. The goal of Coordinated Entry monitoring is to review implementation of CE policies and procedures for compliance, provide technical assistance to CE partners, and identify opportunities for ongoing CES improvement.

CoC Monitoring Committee

The CoC Monitoring Committee will oversee the processes and methodologies used to monitor projects that intend to apply for renewal McKinney Vento funding through the CoC.

The committee will be selected by nominations from the CoC. The CoC Monitoring Committee should include at least 3 people. The committee will use two tools to score 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 Committee. The Committee will use the Monitoring Threshold Tool to designate an acceptable or unacceptable answer to each question.

Monitoring Procedure

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

1. Develop and refine the Monitoring and Evaluation Form, and the methodology used to monitor and evaluate ongoing program performance.
2. Determine an annual threshold score.

3. Present the Monitoring and Evaluation Form and annual threshold score for approval by the CoC prior to the start of the monitoring process.
4. Once approved by the CoC, provide the Monitoring and Evaluation Form to all projects 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 the CoC Program project Executive Director.
5. Review all monitoring returns and determine if each program has adequately responded to each of the monitoring questions.
 - a. If members think that an answer is acceptable they will assign a "1" to the corresponding box in the Monitoring Threshold Tool table.
 - b. If members think that an answer is not acceptable, they will assign a "0" to that box
 - c. The CoC Monitoring Committee will create written criteria and submit for approval to the CoC to make it clear when to assign a 1 or 0.
6. Notify projects by email of their deficiencies within 21 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's Executive Director.
 - b. Projects will be given one opportunity to correct or amend their monitoring returns in order to address any deficiencies found by the Committee.
 - c. The Committee 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.
7. Provide a one-year probationary period for projects that fail to meet the threshold.
 - a. Projects will be required to demonstrate improvement in that area during the probationary period.
 - b. The CoC Monitoring Committee will also offer and/or refer agencies to appropriate assistance and training if available.
 - c. Deficiencies may be addressed through staff training and/or program policy changes.
8. Provide all monitoring results to the CoC Project Ranking Committee.

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 2 weeks to respond in writing to the monitoring committee request.
4. The CoC Monitoring Committee will have 3 weeks to review and request additional information from projects.
5. The projects will have 2 weeks to submit additional information requested by the CoC Monitoring Committee.

Project Performance Criteria

Annually, the Ranking Committee is provided with information about the performance of funded programs 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 to include but 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 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 BoS CoC will consider other system-level performance measures.

Another tool to review the performance of the VT BoS CoC is to add an annual report card of CoC efforts and outcomes relative to strategic priorities. This annual report will be the responsibility of the Collaborative Applicant and the VT HMIS Lead.

In addition to reviewing data, performance, and outcomes, the VT BoS CoC 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 and issues 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 BoS CoC 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.

Roles and Responsibilities

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

Project Ranking 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 is the Vermont State Housing Authority (VSHA). The Collaborative Applicant's primary responsibility is to assemble VT BoS CoC's consolidated application and ranking of projects annually. 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 will be responsible to present 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.

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.