**SC Upstate Continuum of Care**

Abbeville County, Anderson County, Edgefield County, Greenville County

Greenwood County, Laurens County, Pickens County, Oconee County

# SC UPSTATE CoC MONITORING POLICY AND PROCEDURES

1. **Purpose**

The purpose of this document is to provide guidance for conducting Continuum of Care (CoC) monitoring. Based on Section 578.7 of the CoC Program Interim Rule, the Monitoring Committee of the CoC Advisory Council is responsible for monitoring and enforcing compliance by all CoC-funded providers with all HUD requirements and will report compliance to the Continuum of Care and HUD. Each provider will be monitored on an annual basis. Monitoring shall be conducted using the CoC approved Monitoring tool. All the documentation related to the CoC monitoring will be posted on the Upstate CoC website at upstatecoc.org.

CoCMonitoring addresses compliance with the following: national objectives; client eligibility; project progress; fiscal policies; confidentiality; overall management systems; conflict of interest; financial management and audits, allowable costs; cost principles and adherence to federal grant regulations; program income and program disbursements; records maintenance; anti-discrimination, affirmative action and equal employment opportunity; documentation that there is a homeless/formerly homeless persons on Board or involved in other policy making group if available.

1. **Process**

Monitoring will be a Two-Part process:

**Part I** will consist of remote monitoring evaluating risk assessment and program performance data tracking for rating and ranking purposes. Only programs deemed “high-risk” during remote monitoring will be required to comply with Part II of the monitoring process.

**Part II** consists of a site visit. During the site visit the detailed monitoring checklist will be utilized to thoroughly evaluate the program compliance. The monitoring team will consist of, at a minimum, one individual familiar with the CoC housing program process and one individual familiar with HMIS Compliance.

**1. Risk Assessment**

The Monitoring Committee will complete the risk assessment and prioritize the programs deemed “high-risk” to be monitored.

**2. Standardized Monitoring Notification Letter**

The Monitoring Committee will send each agency a Standardized Monitoring Notification Letter to the agency’s Executive Director and HMIS Agency Administrator or Program Manager most familiar with the CoC-funded projects. A minimum notice of 14 business days will be given from the postmark date on the letter. The standardized monitoring notification letter template shall be used to request materials necessary for review prior to the onsite visit. The Monitoring Committee shall use the standard monitoring notification letter. (ATTACHMENT

**3. Uniform Monitoring Instrument**

The Uniform Monitoring Instrument has been developed with CoC-wide input and shall be used by the Monitoring Committee without exception as the sole document in reviewing and recording all program reviews.

This Instrument shall accompany the Standardized Monitoring Notification Letter. This will allow the agency to properly prepare and provide materials needed to ensure a more efficient and transparent monitoring process.

**4. Preliminary Remote Monitoring**

The Monitoring Committee will complete remote monitoring using the online tool. If a site visit is warranted, a Monitoring Notification letter will be sent to the identified agency.

**5. Site Monitoring**

The Monitoring Committee will have an entry meeting with the Executive Director and HMIS Agency Administrator or Program Manager most familiar with the CoC-funded project(s).

The on-site monitoring visit will take place immediately following the entry meeting.

The Monitoring Committee will conduct an exit interview to explain preliminary results of the monitoring visit.

**6. Monitoring Summary Letter**

The Monitoring Committee will send a Monitoring Summary Letter that will contain any findings and concerns within 30 calendar days of the last date of the monitoring visit.

**7. Agency Response Letter**

If relevant, the agency will provide a response letter within 15 days of date of the Monitoring Summary Letter. The response letter must include materials addressing any concerns and findings and corrective action plans to address such if all materials clearing issues are not provided with the response letter.

The agency’s Corrective Action Plans must provide a timeline in which the concerns and findings will be fully addressed for the agency to be in full compliance with the effected regulations.

The Monitoring Committee will review the agency’s response letter, materials and corrective action plans and work with the agency to facilitate resolution of the concerns and findings.

**8. Appeal**

The monitored Agency has the right to appeal concerns and findings in the Monitoring Summary Letter within 15 days of the date of the Monitoring Summary Letter.

The appeal must be presented on agency letterhead and provided to the Upstate CoC Advisory Council Executive Committee and the CEO of the lead applicant, United Housing Connections. Both parties will review all materials and allow the Agency and the monitors to present information.

The Advisory Council may choose to visit the Agency location and do a physical inspection.

The appeal will be resolved within ten business days from the date of the agency’s appeal letter.

**9. Monitoring Final Disposition Letter**

The Monitoring Committee will send a Monitoring Final Disposition Letter to the agency within 15 days of the date of the agency’s response letter (see 7. Above.)

This Monitoring Final Disposition Letter may contain notice of referral of findings to State and HUD representatives if the Corrective Action Plans have not yielded agency compliance by the date of the Monitoring Final Disposition Letter.

This Monitoring Final Disposition Letter may contain notice of referral of findings to State and HUD representatives if the Corrective Action Plans have not yielded agency compliance by the date of the Monitoring Final Disposition Letter.

**10. Corrective and other Possible Actions on Program Non-compliance**

If there are compliance issues reported in the Monitoring Final Disposition Letter that are forwarded on to HUD, there may be remedial actions and sanctions as detailed in the HUD CoC Interim Rule in section 578.107. These may include but are not limited to the following examples:

a) Reprogramming grant funds that have not yet been expended from affected activities or projects to other eligible activities or projects;

b) Suspending disbursement of grant funds for some or all activities or projects;

c) Reducing or terminating the remaining grant of a sub-recipient and either reallocating those funds to other sub-recipients or returning funds to HUD;

d) HUD may suspend payments to the extent HUD determines necessary to preclude the further expenditure of funds for affected activities or projects;

e) HUD may continue the grant with a substitute recipient of HUD's choosing;

f) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible;

g) HUD may require the recipient to reimburse the recipient‘s line of credit in an amount equal to the funds used for the affected activities;

h) HUD may take other remedies that are legally available.

**11. Annual Monitoring Cycle Completion**

Regardless of actions required, all monitoring activity (see C. Schedule, 3. Below) shall be completed at the local CoC level no later than April 30 of each calendar year.

The completed monitoring reviews will be filed at the Lead CoC Applicant Agency for a period of no less than three (3) years.

Members will only discuss monitoring results with Monitoring Committee members and identified agency until the process is complete.

1. **Schedule**
   1. Risk assessments will begin in November. For agencies identified as “high-risk”, the process will be completed by April 30th.)
   2. Given the comprehensive instrument adopted for use, project monitoring shall be scheduled throughout the six (6) month monitoring period to ease burden and time constraints of all involved.
   3. All monitoring, including all follow-up, resolutions and referrals to HUD shall be completed not later than April 30.
2. **Preparation**
   1. The scheduling order of monitoring is determined by a risk assessment; each risk factor is weighted differently. The total score is 100 points. The projects will be monitored in order from highest to lowest according to the risk assessment (see E. below.)
   2. For each project, the provider will be informed of the date and time of the visit at least 14 business days before the site visit in the form of a mailed and emailed monitoring notification letter. At least two CoC Advisory Council Monitoring Committee members will perform the monitoring visit.
   3. The Monitoring notification letter will request standard documents be mailed or emailed to the monitoring lead prior to the site visit for initial review. These documents shall include, but not limited to, annual financial statement or single audit; board composition; etc.
   4. Monitoring is agency or provider based; however, if more than one project is located in the same location, they will be monitored at the same time. Separate forms will be completed for each project.
   5. It is possible that both HMIS and CoC monitoring will take place at the same visit. This will be determined by a combined risk assessment score.
3. **Risk Assessment**

**HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

Each recipient is evaluated annually out of 100 points to determine the risk inherent to the program. The recipients will be ranked from the highest score to the lowest score. Programs will be evaluated according to the following risk assessment:

|  |  |
| --- | --- |
| **Measurement** | **Risk Points Value** |
| HMIS staff turnover | 5 |
| Provider staff not participating/behind in HMIS and relevant training | 15 |
| Provider Responsiveness – Has there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? | 10 |
| Provider Responsiveness – Has there been previous issues with client entry and exit reporting not done within the prescribed time-period? | 20 |
| Data quality (>5% error rate) (APR and Monthly Report Cards) | 40 |
| Previous year monitoring concerns | 5 |
| Previous year monitoring findings | 5 |

**CONTINUUM OF CARE (CoC)**

Each recipient is evaluated annually out of 100 points to determine the risk inherent to the program. The recipients will be ranked from the highest score to the lowest score. Programs will be evaluated according to the following risk assessment:

|  |  |
| --- | --- |
| **Measurement** | **Risk Points Value** |
| Coc staff turnover | 5 |
| Provider participation in their relevant service area/s CoC Chapter/s meetings- Have they participated in 75% of scheduled Chapter meetings | 15 |
| Provider participation in CoC Advisory Committee meetings – Have they participated in 75% of Advisory Council Meetings | 10 |
| Provider Responsiveness – Has there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? Provider Centric | 20 |
| Staff Responsiveness-- Has there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? Staff Centric | 40 |
| Previous year monitoring concerns | 5 |
| Previous year monitoring findings | 5 |

# HMIS MONITORING POLICY AND PROCEDURES

1. **Purpose**

The purpose of this section is to provide guidance for conducting Homeless Management Information System (HMIS) monitoring. Based on the HMIS Proposed Rule 580.9 (e) and Section 578.7 of the CoC Program Interim Rule,the Monitoring Committee of the CoC Advisory Council is responsible for monitoring and enforcing compliance by all HMIS and CoC funded providers with all HUD requirements and will report compliance to the Continuum of Care and HUD. Each provider will be monitored on an annual basis. (See **ATTACHMENT D** for the updated HMIS Data Quality Plan.)

HMIS Monitoring addresses compliance with the following: national objectives; client eligibility; project performance; confidentiality and privacy policies; provider agreements with HUD; overall management systems; adherence to federal grant regulations; client records; records maintenance; anti-discrimination, affirmative action, and equal employment opportunity.

1. **Process**

Full details of the HMIS Monitoring Policies and Procedures are included in a separate statewide document, available at [www.upstatecoc.org](http://www.upstatecoc.org)

All documentation related to the HMIS procedures will be posted on the Upstate CoC website at upstatecoc.org.

1. **Objectives and Strategy**

Our objective is to monitor HMIS and CoC providers to:

1. Ensure HMIS Privacy and Security regulations are being met
2. Ensure that client records match HMIS client records
3. Ensure that projects are meeting national data quality objectives
4. Ensure that projects are meeting national and local performance objectives.
5. Documenting compliance with project rules and record requirements.