Cape Fear Homeless Continuum of Care
Monitoring Policy

Purpose:

The purpose of the policy is to outline the process for monitoring recipients and subrecipients of ESG and CoC funded programs as outlined in 24 CFR 578. This process will outline the roles and responsibilities of the Collaborative Applicant, recipients and subrecipients of CoC funding, and the Cape Fear Homeless Continuum of Care (CFHCoC) in the monitoring process. The purpose of this monitoring process is to assess programs for their ability to meet system performance measure goals, effectively operate programming, comply with HUD requirements, meet HMIS data standards and requirements, and meet any additional CoC requirements as outlined below.

Scope:

This policy applies to everyone who operates under the umbrella of the CoC, including the CoC and HMIS Lead Agencies, the CFHCoC Board of Directors, and agencies that receive ESG and CoC grant funding.

Policy:

Each year, the CoC Lead Agency, who serves as the Collaborative Applicant, will monitor HUD CoC grant funded programs on a schedule that does not impede the grant application processes but ensures all funded projects are monitored at least once every three years. The timeframe for monitoring will occur based on staff capacity and the timeframes of annually occurring grant competitions, with flexibility afforded to the CoC Lead Agency to accommodate scheduling with programs.

Monitoring Activities

The CoC Lead Agency will schedule monitoring with each agency that receives ESG and CoC funding, selecting one or more projects for review at each monitoring event, based on staff capacity. Activities will include:

- Documentary Review: A checklist will be sent each agency selected for monitoring approximately 2 weeks prior to the monitoring meeting. Grant specific documentation will be collected up front for review prior to an on-site visit to review files and other relevant information. The information collected will be reviewed by the CoC Lead Agency and will assess the program's capacity to meet program requirements in the areas of project performance, compliance with project requirements for specific project activities per the grant documents and project operations manual(s), eligible costs/expenses, spending, HMIS usage, and project success measures based on HMIS data and the grant application under which the project was funded.

- <u>File Review:</u> Prior to the on-site visit the Lead Agency will select at least 5% but no more than 10% of random participant files to be physically reviewed for program's abilities to meet record keeping requirements, HMIS data standards, and supportive services requirements, as applicable to the project. The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services.

- <u>Site Visit Interview:</u> This interview will allow the program staff to give feedback and insight into the success and challenges faced in the operating the program and discuss information that may help guide project management and CoC system improvements.

Monitoring Results

Agencies will receive reports from the Lead Agency reviewing the information included in the monitoring and noting any items of concern including specific deficiencies or discrepancies identified by the Lead Agency as well as required next steps or corrective action to be taken, if any. The goal is to ensure agencies are performing in accordance with HUD and CoC expectations. Agencies who show a need for improvement will be provided appropriate support and/or guidance to improve both project and CoC performance.

Specific monitoring results, such as poor project performance or projects not following policies outlined in CoC policies, project operations manuals and/or the regulations, may also require projects to be placed on a Performance Improvement Plan (PIP) to address programmatic concerns. CoC Lead Agency staff will inform agencies and the CoC Oversight Committee of identified issues. If a PIP is required, the agency/project staff will complete the plan, reporting progress to CoC Lead Agency staff for review. The Lead Agency staff will review completion of the plan and provide an updated report to the CoC Oversight Committee. The PIP will include measurable goals, action steps that will be taken to meet goals, and any identified technical assistance (TA) that may be needed from CoC Lead Agency staff or HUD TA to support the agency's effort.

Monitoring evaluations are kept on file for each project by the CoC Lead Agency and shared with the CoC Oversight Committee for review. Results are used to improve project and system performance, contribute data for ESG and CoC federal grant applications, and inform ESG and CoC funding eligibility and awards at federal, state and regional levels (i.e. CoC NOFA and ESG RFP process). These reviews collectively provide the opportunity to see performance at a system-level for overall progress toward ending homelessness as well as specific areas where performance improvement can enhance the CoC's efforts.

CoC Lead Agency Responsibilities

CoC Lead Agency staff will be responsible for scheduling monitoring meetings, reviewing documents provided by the project staff for the agency, and conducting the monitoring reviews and interviews. CoC Lead Agency staff will also be responsible for informing the CoC's Oversight Committee of any findings from the monitoring evaluation review, including program successes or concerns.

Monitored Agency Staff Responsibilities

Agency staff are responsible for attending monitoring visits, preparing, and providing all documentation necessary for the monitoring process, and communicating with CoC Lead.

Agency staff are also responsible for meeting deadlines outlined in the monitoring process. Timeliness and/or non-compliance issues will be noted by CoC Lead Agency staff and included in the monitoring evaluation review that is provided to the Oversight Committee.

Sharing Monitoring Results

Specific groups have the potential to receive monitoring results that disclose the performance of specific agencies/projects. Agency specific monitoring results may be shared with the CoC's Oversight Committee, Ranking Committee, the Board of Directors, and HUD.

The circumstances under which identifiable information will be shared with these groups are: if findings from the monitoring are significant enough that those deciding on matters of funding and/or ranking should be made aware of them or if the agency/project does not participate in all components of the monitoring process.

Aggregate monitoring results may be shared with workgroups and the CoC at large to illustrate system strengths and weaknesses that are identified through the monitoring process.

Use of Electronic Monitoring

To ensure that monitoring procedures can be completed in the most effective and efficient ways, the CoC Lead Agency reserves the right to complete monitoring in person, electronically, or a combination of both.