

Chittenden County Homeless Alliance

Continuum of Care

Monitoring Policy and Procedures

Purpose: The Chittenden County Homeless Alliance (CCHA) Governance Charter references the establishment of system and project-level performance targets appropriate for population and program type, monitoring grant performance and performance improvement. This responsibility falls under the purview of the Alliance as a whole, the Steering Committee, as well as the Application Ranking Committee and the Collaborative Applicant. 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. This policy is designed to meet the assigned regulatory and fiduciary annual monitoring and evaluation process; it will also ensure the Alliance has accurate and timely information about the efficiency, effectiveness and appropriateness of programs, organizations, services and processes that play key roles in making homelessness in Chittenden County rare and brief. Information provided through this process must adequately support the role of the Alliance in the Collaborative Application process, meeting assigned regulatory and fiduciary responsibilities, reviewing, recommending or applying for grants, and/or aligning resources that further the mission and strategic priorities of the Alliance.

Principles:

- Monitoring is not a once a year or periodic exercise but an on-going process of feedback, communication and evaluation.
- The overall goal of monitoring is program compliance and also to assist grantees in carrying out their programs.
- Monitoring is also a time to recognize grantee accomplishments, successful techniques and best practices. 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.

Overall, a grantee's success becomes a success for the Chittenden County Homeless Alliance and for the program beneficiaries served.

Policy: 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 robust procedure for on-going evaluation and monitoring of programs the Alliance recommends for funding. It is the responsibility of the Alliance to review HUD-funded (CoC and ESG) programs for efficiency and effectiveness, as well as compliance with applicable laws and regulations. The Chittenden County Homeless Alliance 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, and other areas as feasible. The policy also serves to assist grantees in improving their performance, increasing their organizational capacity or enhancing their management or technical skills. Lastly, this policy will assist the Alliance in providing recommendations and information to grantor agencies to include but not limited to: US Department of Housing and Urban Development (HUD), State of Vermont Office of Economic Opportunities (OEO), and the University of Vermont Medical Center.

Procedures: Monitoring for the Alliance will include project performance monitoring (both onsite and desktop), system level performance monitoring.

Risk Assessment: The Alliance will use the criteria listed below to determine potential areas and levels of risk for CoC-funded projects. If a grantee is determined to have high risk levels in one area or indicate higher levels of risk across multiple areas, an onsite visit will be required. While certain activities or programs may be more subject to monitoring than others, standard criteria will cause every organization to be monitored at some point in a three year cycle.

Standard criteria for determining risk for CoC-funded projects

1. Desktop monitoring

Collaborative applicant conducts an annual desktop monitoring of each agency's progress in meeting performance and expenditure goals. This review will help inform areas of risk for further review and will generally include both programmatic and financial reviews which include, but are not limited to:

- The cumulative accomplishments of beneficiaries, as compared to goals set by the program
- Appropriate policies, procedures and memoranda for agreements

The financial review includes:

- Cumulative expenditure rate to budget.
- Timely drawdowns
- Adequacy and clarity of supporting documentation for line item expenditures.

2. New Grantees or Organizational Change

First time grantees or grantees experiencing organizational change will be selected for an onsite

review when staff turnover results in a new Program Manager, Financial Officer or Executive Director. Organizational change may also include merging with another non-profit.

3. Cumulative Grant Award

Grantees receiving collective federal grant awards of \$750,000 or more are subject to the Single Audit Act and are required to provide a copy of this audit to the Collaborative Applicant.

4. Administrative History

The extent to which a grantee has correctly submitted APRs and other HUD related reports.

5. Program Performance

The extent to which program performance goals were met.

6. Financial Capacity

The extent to which drawdowns are requested at least quarterly and funds are being expended at a reasonable rate to allow for full expenditure of the grant.

Project Performance Monitoring for CoC-funded projects:

Currently, the Application Ranking Committee is provided with information about the performance of funded programs in HUD required measures only.

How much:

- ◆ # of beds/CH beds
- ◆ # served
- ◆ Bed utilization rate
- ◆ % of missing HMIS data.
- ◆ Match/leverage secured by each organization.

How well:

- ◆ % of participants entering program with status of literally homeless
- ◆ Length of time participants are homeless
- ◆ % of participants accessing one or more mainstream resources/benefits
- ◆ Cost per bed
- ◆ Cost per person (adult only)
- ◆ Timely submissions to APRS
- ◆ Timely draws from LOCCS

Is anyone better off:

- ◆ % and # of participants (stayers/leavers) who increased income
- ◆ % of participants who exit to permanent housing
- ◆ % of participants remaining in permanent housing after 6+ months

Note: Highlighted areas have minimum performance goals established by HUD.

To expand on this basic project performance monitoring, CCHA implements the following steps:

Steering Committee Meeting Presentations – Once the Notice of Funding Opportunity cycle begins, the Alliance makes time during the monthly Steering Committee meetings for each program receiving HUD funds through the Collaborative Application process to provide a mid-year report on progress to date. Those projects that have received funding for more than one year should provide some historical perspective. During the meeting, the Steering Committee will provide input as needed

Desktop Monitoring for CoC-funded grantees – Annually, the Collaborative Applicant will conduct a desktop review of CoC-funded grantees. The Collaborative Applicant will provide a checklist to each grantee 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, 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.

On-site Monitoring for CoC-funded grantees– A Sub-committee of the Application Ranking Committee, along with the Collaborative Applicant conducts site visits to all programs who receive CoC funding. The on-site monitoring will include random file reviews to ensure proper documentation for homelessness, disability documentation and other compliance requirements as well as qualitative interviews on project successes and challenges. A representative from another Housing Authority will perform the file review. Monitoring criteria for S+C and RRH grantees will include their participation with the CES, prioritization process and the Housing First approach. All organizations and programs will receive an initial on-site visit. After the baseline visit, an annual risk assessment will determine if an on-site visit is needed. Agencies will receive an on-site visit at least one time every 3 years.

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 Steering Committee will review these system level performance measures at least annually with information provided by the HMIS Lead. The Steering Committee will consider other system-level performance measures.

Another tool to review the performance of the Alliance is to add an annual report card of Alliance efforts and outcomes relative to strategic priorities. This annual report will be the responsibility of the Collaborative Applicant and ICA.

In addition to reviewing data, performance, and outcomes, the Alliance 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 seek to help. 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.

The Alliance may also choose to use the results from existing data and enhanced data collected to organize an annual Datawalk at a Quarterly Meeting. This activity would be the responsibility of the Steering Committee or designee and take place during the Winter Quarterly Meeting.

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.

ESG Project Monitoring - HOP grantees will be asked to provide updates during Steering Committee meetings at least two times per year in accordance with their agreement with the Vermont Office of Economic Opportunity. The Steering Committee may decide to provide formal feedback on priorities, outcomes and possible funding to the State as a result of these updates.

Proposed Timeline of Monitoring:

January – March

- Steering Committee conducts an annual satisfaction survey of Steering Committee members and other key community partners
- Steering Committee or assigned subcommittee conducts an annual evaluation of the Coordinated Entry System
- Collaborative Applicant begins desktop monitoring of CoC-funded programs
- Steering Committee or designated sub-committee debriefs PIT count participants, prepares for review of procedures, data and later analysis of PIT data.
- HOP grantees provide an update on project performance.
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April – June Each program receiving HUD funds through the Collaborative Application process will provide a mid-year report on progress to date along with a comparison to last year's accomplishments.

- Steering Committee provides input as needed and appropriate to the HOP application process
- Steering Committee reviews and adjusts strategic activities and priorities
- Steering Committee or designated sub-committee reviews PIT count procedures, and data, provides analysis of data quality, develops proposals for improving PIT count.

July – September

- Application Ranking Committee completes and Alliance confirms the Ranking and Prioritization process for HUD
- Sub-committee of Steering Committee may conduct site visits to all partners in the Coordinated Entry System
- HOP grantees provide an update on project performance

October – December

- Sub-committee of Steering Committee conducts site visits to selected CoC-funded programs
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Findings, Concerns & Noncompliance

Findings

Where an identified deficiency results in a finding of non-compliance with CoC rules, the finding must 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 cause explains why the condition occurred.
- d. The effect describes what happened because of the condition.
- e. The corrective action identifies the action(s) needed to resolve the problem and, unless inapplicable or there are extenuating circumstances, should include the time frame by which the grantee is to respond to the finding.

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

Concerns

Monitoring concerns brought to the grantee's attention should include the condition, cause, and effect as described above. The reviewer should suggest or recommend actions that the grantee may take to address a concern, based on sound management principles or other guidelines. However, corrective actions are not required for concerns.

Actions for Non-Compliance

Grantees who are found to be in non-compliance and receive a finding as a result of their monitoring will be provided with technical assistance towards resolution and improvement. It is the general policy of CCHA 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. Requested changes in policies or practice would have a timeline of implementation and response between 30 and 60 days. Unresolved findings or findings which may jeopardize future funding will be shared with CCHA's Steering Committee.

Roles and Responsibilities:

Steering Committee: The overall responsibility for the monitoring of grantees receiving CoC/ with the Steering Committee of the Chittenden County Homeless Alliance. The specific responsibilities as outlined in this policy include: conducting an annual satisfaction survey and evaluation of the Coordinated Entry System; hearing presentations by grantees during summer months at Steering Committee meetings, providing input into the HOP application process and final review of the ranking and prioritization of CoC-funded projects. The Steering Committee will work with the State of Vermont Office of Economic Opportunity to create a venue to evaluate the outcomes of ESG/HOP projects via their project performance reports. The Steering Committee may designate a sub-committee or an ad-hoc committee to do any of the previously mentioned responsibilities.

Application Ranking Committee is provided with information about the performance of CoC-funded programs in HUD required measures. Along with this information, this committee is responsible to review project applications and propose funding and ranking to the Steering Committee. In addition, the Committee along with the Collaborative Applicant and a representative from VSHA will conduct site visits to programs who receive CoC funding at least every three years or when the risk assessment warrants an on-site visit.

Collaborative Applicant is the *Community & Economic Development Office (CEDO)* of the City of Burlington. The Collaborative Applicant's prime responsibility is to assemble CCHA'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 Application Ranking Committee as well as for the annual report card. Finally, the Collaborative Applicant will coordinate both the risk assessment, scheduling of site visits to grantees and follow-up monitoring letter.

Grantees will be responsible to present on the progress of their CoC funded projects at least annually to the Steering Committee. ESG/HOP grantees will be required to report at least two times per year. CoC-funded grantees will also be responsible to respond to desktop monitoring and/or onsite monitoring requests as appropriate. A grantee will also be responsible to respond to corrective actions.

Tools Used in Monitoring:

The following tools will be utilized for the various types of monitoring visits in this policy. Each tool will be provided to the grantee.

Desktop monitoring checklist

On-site monitoring checklist

On-site monitoring tool

System-level performance monitoring

System-level annual report card

Coordinated Entry System Monitoring

The Steering Committee will review and approve of these tools before implementation.

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