

CoC Monitoring Plan

Ohio Balance of State Continuum of Care

Updated: August, 2021



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Background

Overview

The Ohio Balance of State Continuum of Care (BoSCoC) establishes project and system performance goals for the CoC and conducts ongoing monitoring of program performance for all CoC-funded projects. Additionally, project providers are required to monitor their own performance on a regular basis to ensure that they are meeting the goals established by the CoC.

Continuum of Care

A Continuum of Care (CoC) is a geographically based group of representatives that carries out the planning responsibilities required by the U.S. Department of Housing and Urban Development's (HUD) CoC Program. These representatives generally come from organizations that provide services to persons experiencing homelessness.

The Ohio Balance of State Continuum of Care

The Ohio BoSCoC represents the 80 largely suburban and rural counties in Ohio. Within these 80 counties there are approximately 400 homeless programs including emergency shelters, transitional housing, rapid re-housing programs, and permanent supportive housing. On any given day, these programs can serve over 7700 persons experiencing homelessness.

BoSCoC In-Person Monitoring

Beginning in 2019, a Continuum of Care Coordinator from the Coalition on Homelessness and Housing in Ohio will be traveling to CoC funded agencies throughout the 80 rural counties in the BoS to conduct monitoring visits. These visits will be scheduled in advance via email with program leadership in an effort to allow agencies to prepare and be aware of any upcoming visits.

Additionally, in an effort to understand which programs in our CoC are utilizing best practices and procuring the highest outcomes, results of program monitoring will be evaluated on a 125-point scale. Programs that illustrate high quality outcomes and compliance with best practices and procedures will only be required to participate in monitoring visits on a biennial basis (every two years). In contrast, programs that receive lower scores may be required to participate in monitoring visits on an annual basis or at the discretion of the CoC Coordinator. Programs will be informed of their ranking and frequency of monitoring visit, at most, 30 days after their most recent evaluation has taken place.

BoSCoC Virtual Monitoring

Beginning in 2021, in response to the ongoing COVID-19 pandemic, the Ohio BoSCoC team has adjusted the monitoring process to allow for virtual remote monitoring of CoC funded programs. Virtual monitoring's will review for compliance with the same items as in-person monitoring. However, instead of a CoC Coordinator traveling to various agencies, projects will be required to email or upload necessary documentation and evidence of compliance. All other aspects of monitoring will remain the same.

Purpose

Superficially, the purpose of these monitoring visits is to ensure that CoC funded programs are compliant with HUD regulations. However, these visits are also to ensure that the most vulnerable in our communities seeking assistance from CoC funded programs are receiving the best services possible.

Outline of Monitoring Activities

Documents used for Monitoring:

1. Client File Review
 - a. Program leadership should choose two client files for CoC Coordinator to review during scheduled monitoring. Both files should represent a client that entered the program no earlier than January of 2018. Additionally, if possible, at least one file should be of a client who has been in the program longer than 12 months.
 - i. To ensure privacy and security of client personally identifying information (PII) during on-site monitoring, program staff will hand client file to CoC Coordinator who will then review file in a private room. Once the client file review is complete, CoC Coordinator will hand client file back to the same person and the file will be locked away. No client identifying information will be written on scoring sheet in order to protect client confidentiality.
 - ii. If monitoring is done virtually, program staff will upload any documentation necessary to gain points on the Monitoring Scoring Tool directly to Clarity via the "Files" tab of the client's record. As the selected HMIS system for the entire Ohio BoS, Clarity provides secure access of client information to the CoC staff monitor who, as an end user, will ensure data and client privacy.
 1. For domestic violence agencies, the CoC Coordinator will work directly with agency staff in advance of monitoring to determine the most secure way to access client files.
2. Annual Progress/Performance Reports
 - a. CoC Coordinator will run these reports via Clarity and review prior to site visit.
3. HMIS Client Records
 - a. Program leadership will provide CoC Coordinator with four client HMIS IDs to view prior to site visit or virtual monitoring. CoC Coordinator will pull two of the four client IDs and review remotely prior to site visit. No client identifying information will be written on scoring sheet in order to protect client confidentiality.
4. CoC Applications
 - a. CoC Coordinator will review the most recent CoC application submitted by project during CoC Competition. This review will happen prior to site visit.
5. Agency Policies and Procedures
 - a. CoC Coordinator will review the most recently submitted Policies and Procedures documents submitted to CoC staff during CoC Competition. If an agency has updated their Policies and Procedures more recently, they may submit via email updated documents prior to the scheduled monitoring.
6. Financials
 - a. Program leadership should review the Financials tab of the Scoring Tool to determine which documents they need to submit in order to provide evidence of each scoring criteria.

CoC Coordinator will communicate with program leadership to determine the best time for a monitoring visit to occur. This communication will happen at least one week in advance to allow for the program to gather necessary documents and assign a contact person.

For in-person monitoring, CoC Coordinator will arrive at program at scheduled time and briefly meet with program contact person to provide an overview of the visit and obtain necessary documents. For virtual monitoring, CoC Coordinator will schedule a time and provide a link to a GoToMeeting to provide an overview and answer any questions before monitoring begins. CoC Coordinator will utilize a standardized monitoring scoring sheet to determine how many points agency will receive overall. After reviewing documents and calculating score, CoC Coordinator will conduct a brief exit interview, either in person or via GoToMeeting, with program contact to go over findings and allow time for any questions and/or clarifications. Finally, a follow-up letter detailing monitoring results and any corrective action suggestions will be drafted and sent to agency lead within 30 days.

Ultimately, if the results of the monitoring visit indicate that the agency has scored an 80% or higher, monitoring visits will occur on a biennial (every two years) basis. If the agency scores between 79%-50%, monitoring visits will occur annually. And if an agency scores below 50% on the monitoring scoring tool, the agency will be subject to monitoring visits at the discretion of the CoC Coordinator. Additionally, if the need for specific technical assistance and training should arise during the monitoring visit, the CoC Coordinator will communicate and schedule the TA with the project representatives.

Below, please find an outline of the monitoring visit process outlined above:

Step:	Objectives:
1. Written Notification	<ul style="list-style-type: none"> • Confirm the dates and the scope of the monitoring • Provide a description of the information the grantee will review during the visit • Specify the expected duration of the monitoring, which staff will be involved, and what office space is required
2. Entrance Conference	<ul style="list-style-type: none"> • Meet on-site, or virtually, with agency contact person prior to CoC Coordinator file review • Clarify purpose, scope and schedule of the visit
3. Documentation, Data Acquisition, and Analysis	<ul style="list-style-type: none"> • Use monitoring checklist or handbook to make notes about case files, statistics or financial figures and subgrantee's written policies
4. Exit Conference	<ul style="list-style-type: none"> • Present preliminary results of the monitoring visit • Highlight subgrantee's areas of compliance, agency strengths, innovative or commendable practices • Provide an opportunity for the subgrantee to correct any misconceptions or misunderstandings • Secure additional information from subgrantee staff to clarify or support position • Provide subgrantee the opportunity to report on steps already being taken to correct deficiencies
5. Follow-Up Monitoring Letter	<ul style="list-style-type: none"> • Recognize positive areas and/or areas of significant improvement • Make recommendations for improvement, if there is a concern • Specify corrective action steps, if any • Provide numerical overall score of monitoring visit • E-mail within thirty days, or within timeframe established by the grantee

Sample Monitoring Scoring Tool

Agency Review

Review Type:	Question:	Yes	No	Points Available:
Agency				
1	Was the most recent APR submitted on time?			2
2	Is there an agency written standards and procedures for assessment, eligibility, outreach, intake, prioritized individuals, and reassessing participants?			2
3	Does the agency operate a housing first program. Specifically, project admission is not contingent on pre-requisites such as abstinence of substances, min income, health/mental health history, medication adherence, criminal justice record (within reason), financial history, completion of treatment, participatoin in services, 'housing readiness', or other unnecessary conditions unless required by law.			2
4	Are the number of participants currently being served consistent with the service number in the approved application? The subrecipient must serve at least as many program participants as shown in its application for assistance.			1
5	Do the majority of program participants exit to a positive housing destination?			1
6	Are there data quality errors and warnings in R minor elevated for the project being evaluated?			1
7	Does the agency have a policy on client confidentiality or a filing system to safegaurd client confidentiality?			2
8	Project admission process is not overly burdensome to clients by requiring, for example, completion of unnecessary paperwork, or sharing of applicant documents/information that are neither required by HUD nor directly relevant to project eligibility or prioritization efforts			2
9	Project has policies that outline some method for prioritizing for assistance those persons with greater levels of need and/or greater barriers			2
10	Staff helping participants are aware of and know how to access a wide array of housing options (public/private, subsidized/unsubsidized, all local permanent supportive housing etc) to help participants achieve their Housing Plan goals			2
11	Are agency grant funds matched with no less than 25% of cash or in-kind contributions from other sources?			2
12	Does the agency enable homeless or formerly homeless persons the opportunity to participate in policymaking on the board of directors or other equivalent policy making procedures?			2
13	Service planning is individualized and driven by client needs and desires			2
14	Leases and occupancy agreements do not include provisions that would not be found in standard rental agreement			2
15	Does the agency make known the avallability of the housing to eligible participants regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply without special outreach?			2
16	Is there written termination policy and does it provide for a formal process that recognizes the due process rights of individuals receiving assistance?			2
17	The overall focus of the of the project is on helping clients obtain and move into housing quickly, and providing supports and serviecs to help them retain housing			2
18	Does agency have written procedure for termination of assistance, complaints, and appeals?			2
19	Does the recipient have written intake procedures demonstrating participation in the CoC's Coordinated Entry System (CES) and compliance with CoC guidance?			2
20	Does the recipient have written procedures which include an Equal Opportunity statement (Fair Housing, Non-Discrimination, and Reasonable Accommodations)?			2
21	Does the agency have a record retention policy?			2
22	Does the agency have a policy/procedure that addresses an emergency transfer plan for those who experienced domestic violence in their unit?			2
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Financials Review

Review Type:	Question	Yes	No	Points Available	P
Financial Documentation					
	1 Sample transaction records indicate that grant expenditures were eligible costs, necessary and reasonable for proper and efficient administration of the program, allocable to the program, and supported by adequate source documentation.				2
	2 The recipient's financial records (e.g. drawdowns, unexpended balances) should match the information in HUD's financial management systems (LOCCS and IDIS) for the period under review.				2
	3 The grant agreement and financial records indicate that costs are eligible, being expended to the correct line item, and meet specific restrictions on combining grant funds.				2
	4 Review of financial records indicate that the match contributions were equal to the match requirement of all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources.				2
	5 Review of financial records indicates that match contributions consist of cash and/or in-kind contributions from eligible non-CoC sources.				2
	6 Review of financial records indicates that cash match contributions from both the recipient and its subrecipients are limited to eligible CoC Program costs.				2
	7 Review of financial records indicate that the value of each in-kind contribution was calculated properly.				2
	8 Review of financial records indicate that the recipient has adequately documented the eligibility and value of the cash and in-kind match contributions for the operating year(s) reviewed?				2
	9 Project Administrative Costs do not exceed 10% of the grant awarded.				2
	10 Program income earned during the grant term is retained by the recipient and added to funds committed to the project by HUD and the recipient to be used for eligible activities.				2
	11 The recipient maintains records of the receipt and use of program income.				2
	12 The recipient uses program income received (rent-PSH or occupancy charge -TH) for eligible costs of the CoC project.				2
					24

Client File Review

Review Type:	Question	Yes	No	Points Available
Client File				
	1 Does the recipient have a sample of a complete client intake packet available for review?			2
	2 Is there documentation to show that participant has been screened via centralized assessment system and determined eligible for CoC Program assistance?			2
	3 Client files for those receiving leasing assistance indicate that unit does not exceed HUD-determined FMR. Clients files for those receiving rental assistance indicate that unit meets rent reasonableness standard.			2
	4 Is the program participant coming from the target populations (e.g chronically homeless youth, substance abuse, mentally disable, etc) listed in the CoC application?			2
	5 Does the program participant's intake form or assessment document that the individuals or families were homeless prior to entry?			2
	6 Is homeless status properly documented? (what type of documentation is included to verify homeless status?)			2
	7 Are supportive services being offered to clients as needed?			2
	8 Is there a completed verification on all sources of income?			2
	9 Is the rent charged accurately calculated, including deductions and utility allowances, if applicable?			2
	10 Is there a completed HQS inspection?			2
	11 Is there a completed HQS annual inspection?			2
	12 Do program participants have a lease or occupancy agreement?			2
	13 Is there documentation showing that the case manager has met with the household at least monthly during their program enrollment period to develop individual service plans?			2
	14 Is there evidence of referrals to mainstream resources?			2
	15 Is there an HMIS Consent to Release Information Form signed by both client and staff?			2
				30

Transitional Housing Review

A	B	C	D	E	P
Review Type:	Question	Yes	No	Points Available	P
Transitional Housing Only					
	1 Do program participants have a lease or occupancy agreement for a term of at least one month that is automatically renewable upon expiration and may not exceed 24 months?				5
	2 Is the participant someone who has been assessed as not being able to quickly resolve their homelessness on their own, but who does not have a need great enough to necessitate placement into PSH?				5
	3 Is there proper documentation of homeless status and project eligibility?				5
	4 Is obtaining permanent housing the highest priority for the participant?				5
	5 Do participants meet category 1 or 4 of HUD's homeless definition?				5
	6 Are participants required to meet with case manager on a regular basis to evaluate ongoing need?				5
					30

Rapid Re-Housing Review

Review Type:	Question	Yes	No	Points Available	P
Rapid Re-Housing Only:					
	1 Is income reviewed at least every 90 days or when there is a change in income and is documentation of the review on file.				5
	2 Were housing identification services, rent/move-in assistance (financial), and Rapid Re-housing Case Management and Services offered without being required?				5
	3 Is income calculated in accordance with 24 CFR 5.609 and 5.611 and is the rent charged not more than 30% of family's adjusted income?				5
	4 Is there a lease agreement under the participant's name with a term of at least 12 months?				5
	5 Did the person/family come directly from an emergency shelter or unsheltered location?				5
	6 Is there evidence in the client files that case managers are conducting an annual assessment of the service needs of all program participants and adjusting services as necessary?"				5
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Permanent Supportive Housing Review

A	B	C	D	E
Review Type:	Question	Yes	No	Points Available
Permanent Supportive Housing				
	1 Does the file include verification of chronic homeless status and disability?			5
	2 Was the participant provided permanent housing assistance without a designated length of stay?			5
	3 Do the program participants have a signed lease agreement that does not include provisions that would not be found in standard lease agreement and is for at least 12 months?			5
	4 Are program participants required to complete an annual assessment of their service needs with an adjustment of services as necessary?			5
	5 Does the file show prioritization of chronically homeless? If not chronic homeless, is there evidence that this person reasonably follows the order of priority?			5
	6 Is the tenant paying no more than 30% of their income toward rent and utilities			5
				30

Final Scoring

Review Type	Points Possible:	Points Given:
Agency	41	
Financials	24	
Client File	30	
Transitional	30	
RRH		
PSH		
Total Points Given:	125	