

Addendum B

Vancouver/Clark County COC Programs Monitoring Policies and Procedures

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1. SCOPE AND PURPOSE

The Vancouver/Clark County Continuum of Care (COC) monitoring policies and procedures apply to all COC funded programs. The policy applies to the monitoring of COC grantees. The purpose of this policy is to define a process for monitoring. Monitoring will be performed in accordance with grant requirements and best practices, which may include administrative, financial and programmatic components.

Monitoring is the observation and review of a service facility, its staff, its files and sometimes consumers receiving services. It is intended to gather information about the way a program functions. It identifies program policies and practices, analyzes how they affect the operations and consumers and asks how there can be changes to improve operational efficiencies and services provided to consumers. Monitoring usually focuses on practices and finding patterns as opposed to one time occurrences, looking at business and service delivery in the aggregate.

Monitoring should have a high degree of organization, formality and objectivity in the investigation, documentation and use of information and is based on the idea that presenting objective, detailed evidence about business operations and services provides the best information about how an agency is meeting statutory, regulatory and contractual obligations and identifies changes that are necessary to meet administrative and practice standards. An organized and formalized process reduces objections about preparedness and knowledge of the review team and allows for targeted technical assistance.

2. TYPES OF MONITORING

- 2.1. Routine On-Site monitoring: A review of performance outcomes, quality, documentation of services, file review, contract compliance, funder compliance and may include financial monitoring.
- 2.2. Targeted On-site monitoring: An investigation of a specific problem or risk area brought to the attention of the COC Steering Committee. A targeted monitoring may be triggered by the following: Questionable death or serious injury of a consumer, report of exploitation of consumer, report of waste, fraud and abuse, report of violations of law or regulation.

3. ROLES and RESPONSIBILITIES

- 3.1. COC Steering Committee: Is responsible for ensuring program compliance and performance.
- 3.2. Council for the Homeless: Is the administrative body of the COC and provides support to the entities performing the monitoring visits and providing monitoring responses.
- 3.3. COC Steering Committee Monitoring Task Force: Is responsible for monitoring COC programs for compliance and performance and providing the information to the COC Steering Committee. The Task Force develops programmatic and performance measurement based questions for programs to answer, then scores the answers based on pre-determined scoring scales. The Task Force also schedules, develops on-site monitoring tools, and conducts on-site program reviews using pre-determined scoring scales and in conjunction with the Council for the Homeless.

4. ON-SITE REVIEWS

- 4.1. Routine On-Site Reviews: The COC Steering Committee Monitoring Task Force will develop an annual schedule of routine on-site reviews for each calendar year.
- 4.2. Targeted: Targeted reviews should be schedule as needed, based on the identified targeted areas. The Council for the Homeless will alert the COC Steering Committee of a potential need for a review.

5. PROCEDURES FOR ON-SITE MONITORING – Routine and Targeted

- 5.1. Council for the Homeless will provide technical assistance and oversight of the monitoring process.
- 5.2. The COC Steering Committee Task Force will organize a monitoring team of at least two people for each on-site review and of at least three people to review the programmatic and performance measurement question responses. The team should consist of at least one person from the COC Steering Committee and people who are active in the Coalition of Homeless Service providers (CoC). To avoid any conflict of interest, team members should not have an employment or board member relationship with any agency receiving COC program funds (excluding CoC Planning and HMIS).

One team member will be identified as the Chair. The Chair is responsible for the following:

- 5.3.1. Organizing the monitoring:
 - 5.3.1.1. Planning the work

- 5.3.1.2. Ensuring the team works from the plan
- 5.3.1.3. Reviewing and adjusting the work plan according to findings when the review is initiated,
- 5.3.1.4. Seeking technical assistance from CFTH
- 5.3.1.5. Submitting monitoring scores to the COC Steering Committee Chair.

5.3. **Contacting the Contractor** being reviewed. The COC Program File Checklist will be provided to the housing program at least three weeks prior to the scheduled monitoring date. Notify the contractor of the planned entry date and time and arrange for:

- 5.3.1. Entrance meeting with contractor staff;
- 5.3.2. Space to work;
- 5.3.3. Schedule of individuals to be interviewed, if needed; and
- 5.3.4. Documents required (e.g. program files, policies and procedures).

5.4. **On-site Entrance Interview:** Meet with contractor staff, and:

- 5.4.1. Inform them of the purpose of the on-site review;
- 5.4.2. Determine lead representatives from the contractor to work with during the on-site, who will be available to answer questions, and how to contact them;
- 5.4.3. Inform the contractor about the files you want to review and that you want to randomly select the files;
- 5.4.4. Answer questions; and
- 5.4.5. Initiate review process.

5.5. **Conducting the On-Site Review:**

- 5.5.1. Review at least six files or 10% of total active files, whichever is less. Review of files and observations are important.
 - 5.5.1.1. Review files to ensure all items on the COC program file checklist are met and completely filled out.
 - 5.5.1.2. Review case notes for housing first program fidelity and adequate efforts to engage clients.
 - 5.5.1.3. Ensure programs are following their program's provided written policies and procedures.
 - 5.5.1.4. Discuss any questions or concerns with program staff.
 - 5.5.1.5. Observe and learn about how confidential information is stored (Is protected information readily accessible to patients or visitors or secured?)

5.6. **Preparing the Monitoring Score:** The Monitoring Score will stem from the completion of the contractor monitoring visit file review, the answers to the COC programmatic and performance measurement questions. In preparing the report, the chair will:

- 5.6.1. Review each file checklist scores and average the scores of reviewers.
- 5.6.2. Review COC programmatic and performance measurement question scores from the task force and average all scores.
- 5.6.3. Add the file checklist scores and the question scores. The point total of inapplicable questions will be deducted from the total scores amount.
- 5.6.4. Incorporate scores, ranked as percentages and suggestions for improvement into a scoring spreadsheet. The scoring spreadsheet will separately contain a score as to the programs' adherence to applying the Housing First model as well as a total score. Provide to:
 - 5.6.4.1. COC Steering Committee Chair; and
 - 5.6.4.2. Council for the Homeless Executive Director;
- 5.6.5. The Council for the Homeless will then incorporate the program score into the annual ranking and selection process and submit to the CoC Steering Committee.

5.7. The COC Steering Committee: The COC Steering Committee will review the Task Force's monitoring scores as part of the annual ranking and selection process.

5.8. Technical Assistance Scoring Threshold

- 5.8.1. During the 2017 monitoring process, programs that score less than 60% of the scoring points available will be identified as needing technical assistance.
 - 5.8.1.2. Technical assistance may include requiring staff and administrators to attend trainings, creating a program fidelity plan, contracting with experts in the field to provide support and shadowing best practice programs in the region.
- 5.8.2. A program scoring below the technical assistance threshold more than one year in a row, may be subject to funding reallocation to make way to high performing programs. This will be determined by the COC Steering Committee as part of the annual ranking and selection process.

5.9. COC Program Monitoring Grievance Process

- 5.9.1. A COC programs may submit a grievance to the COC Steering Committee based on any of following:
 - 5.9.1.1 The monitoring unnecessarily restricts competition;
 - 5.9.1.2 The monitoring evaluation or scoring process is unfair; or
 - 5.9.1.3. The monitoring requirement documents are inadequate or insufficient to prepare for the process.
- 5.9.2. A grievance must be submitted to the Council for the Homeless, Executive Director at any time up to three days before the scores are shared with the COC Steering Committee. The grievance must meet the following requirements:

- 5.8.2.1 The grievance must be in writing;
 - 5.8.2.2 The grievance must be sent to the Council for the Homeless, Executive Director in a timely manner;
 - 5.8.2.3 The grievance should clearly articulate the basis for the complaint;
and
 - 5.8.2.4 The grievance should include a proposed remedy.
- 5.8.3 The Council for the Homeless (CFTH) Executive Director (ED) will work with the COC Steering Committee Chair and the COC Executive Committee to determine if the grievance has merit. The response will be provided to the COC program agency representative in writing. The same grievance may only be raised once during the protest period. The COC Executive Committee and CFTH ED response to the grievance will be final. There will be no appeal process.
- 5.8.4 If a grievance is found to have merit the necessary change(s) will be made to the current COC monitoring score and/or process, if possible. If not possible due to strict HUD timelines, the necessary change(s) will be made in the following year's COC monitoring process.