

Preventing and ending homelessness in Clark County

Clark County/City of Vancouver Continuum of Care Instructions for FY2017 Grant Ranking and Selection Process

Table of Contents

Introduction	Page 3
Application Process Overview/Amount Available	Page 3
Application Process Details/Important Dates	Page 4
Highlights of this Year's Competition	Page 4
Local Ranking Priorities	Page 4
If a Project is Accepted through the Local RFA is it Guaranteed Funding?	Page 5
Information on Partial Reallocation for Renewal Applications	Page 5
Addendum A:	
2017 Renewal/Expansion Project Threshold Requirements	
2017 New Project Threshold Requirements	
2017 Renewal/Expansion Project Scoring	
2017 New Project Scoring	
Addendum B: CoC Programs Monitoring Policies and Procedures	
Addendum C: Continuum of Care Overview	

Introduction

The Council for the Homeless (CFTH), the lead agency for the Clark County/City of Vancouver Continuum of Care (CoC)also known as the Coalition of Service Providers- coordinates the process to submit the annual consolidated application for U.S. Department of Housing and Urban Development's (HUD) CoC Homeless Assistance Program funding.

Annually, HUD releases a Notice of Funding Availability (NOFA) for federal funding for CoC Homeless Assistance Programs funding. It is a collaborative application process – each CoC submits a Consolidated Application, which includes an individual project application for each program for which we hope to receive CoC funding. All programs must submit their application through their local CoC – HUD will not review any applications that are submitted independent from a CoC.

We have a local application process (outlined in this document) to determine which currently-funded projects the community will include in our application for renewal; which new applicants will be included; and how each project is prioritized in case HUD does not fund all the projects.

This document outlines the local application process and how it relates to the submission of the consolidated application to HUD for CoC funding. It also includes the instructions for how to complete this year's local application process.

All information and forms pertaining to the process are available on the CFTH website on the FY2017 CoC Application page. <u>www.councilforthehomeless.org</u>.

Application Process Overview/Amount Available

The HUD Notice of Funding Availability (NOFA) provides the process and requirements for the submission of the 2017 HUD Project Application. It is imperative that all new and renewal applicants read the NOFA and accompanying guidance from HUD (https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-programcompetition/). All applicants must submit project applications electronically through the e-snaps system (for instructions: https://www.hudexchange.info/programs/e-snaps/guides/coc-program-competition-resources/#cocprogram-competition--project-applicants). It is the responsibility of each project applicant to get their information entered into e-snaps by the deadlines outlined below. Once all individual project applications are entered into e-snaps they are linked to the Clark County/City of Vancouver Consolidated Application and accepted applications are submitted by the Council for the Homeless as one entire submission package to HUD.

For FY2017, the Vancouver/Clark County CoC has the ability to apply for \$1,691,381 in renewal projects or if there are renewal projects that are reallocated in part or in whole that money can be used for new projects. In addition, our local CoC can apply for \$101,483 of new funding under the Permanent Housing Bonus. The NOFA lists what types of new projects are eligible for funding. Please note that the types of projects are more restrictive for the Permanent Housing Bonus than for new projects created through reallocation. We encourage organizations to apply for new funds as we will competitively rank those applications against renewal applications and will help determine if reallocation is in the best interest of the community.

The Council for the Homeless will review all new and renewal applications to see if they meet the HUD and CoC threshold requirements. The Council for the Homeless will then combine the performance measures and monitoring scores as well as the new project application scores into the project rating and ranking tool designed by HUD and submit to the CoC Steering Committee for final decisions. All projects will receive written notification if their project was accepted or not into the community application (in full or in part).

Application Process Details/Important Dates

- On July 28th, the CoC will release a request for applications (RFA) for all new and renewal applications as part of the FY17 CoC NOFA process. CFTH will email the RFA to the CoC listserv and post it on the CFTH website (www.councilforthehomeless.org).
- Between July 28th and August 16th, Andy Silver (Executive Director of the Council for the Homeless) and Kate Budd (Deputy Director) will be available to organizations that want more information or have questions about the RFA or any part of the process. Andy's email is <u>asilver@councilforthehomeless.org</u>. Please note that Andy will be traveling from July 31st to August 9th, so please try Kate Budd first during this time period at kbudd@councilforthehomeless.org.
- All new and renewal applications must be submitted electronically in the e-snaps system by **August 16**th at 5pm. Failure to submit an application by the deadline may result in disqualification from the competition.
- The Council for the Homeless will review all new and renewal applications to see if they meet the HUD and CoC
 threshold requirements. The Council for the Homeless will then combine the performance measures and
 monitoring scores as well as the new project application scores into the project rating and ranking tool designed
 by HUD and submit to the CoC Steering Committee.
- On August 30th, the CoC Steering Committee will approve the final project listing and prioritization and shortly thereafter, projects will be notified in writing, and the final version will be posted on the CFTH website.

HUD Highlights of this year's competition

We encourage applications to read the HUD document "FY 2017 Continuum of Care (COC) Program Competition NOFA – What's New, Changes, and Highlights" (<u>https://www.hudexchange.info/resources/documents/fy-2017-coc-program-competition-nofa-whats-new-changes-and-highlights.pdf</u>) to see an overview of everything that has changed from last year's competition. One of the highlights from this document is that HUD is allowing current projects to apply for new funds to expand this year. This means a renewal project could apply for their renewal funds, as well as new funds to serve more people. If both applications were successful, the successful organization would only have once contract and one project with HUD for the total funding amount. Please see the above referenced document and the NOFA for more information about this.

Local Ranking Priorities

For FY 2017, the CoC Steering Committee has determined that Permanent Supportive Housing applications and joint transitional and rapid re-housing applications up to \$101,483 will be considered high priority; rapid re-housing applications will be considered medium priority; and, transitional housing applications will be low priority (we do not anticipate any applications in this category because it is not allowed for new projects and we have no renewal projects that are transitional housing). All projects in the high priority category will be ranked by score, then the projects in the medium category, and then finally the low category.

If a Project is accepted through the Local RFA, is it guaranteed funding?

No. New and Renewal projects selected through our local RFA process will be included in the community application to HUD. Individual projects may still be rejected by HUD for not meeting HUD's technical sufficiency requirements. Also, individual projects may not be funded by HUD due to lack of HUD funds and their position on our prioritization list.

Information on Partial Reallocation for Renewal Applications

The CoC Steering Committee will consider a partial reallocation of grant funds if a renewal application has bed/unit utilization rates under 90% or did not spend all of the money available in its HUD contract. The CoC Steering Committee will consider whether the issues that led to the low utilization or underspending are temporary and whether the issues have already been corrected in order to make this determination.

Addendum A

RENEWAL/EXPANSION THRESHOLD REQUIREMENTS

Project Name:			
Organization Name:		Renewal/Expansion Projects	
Project Type:	if you would like to change the project type, please do so in the	Threshold Complete	
Project Identifier:	HIC and re-copy the data to the RAW HIC DATA tab, or do so in the LIST OF PROJECTS TO BE REVIEWED.	0%	

THRESHOLD REQUIREMENTS

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration with current information.

2. Applicant has Valid DUNS number in application.

3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, consistent with the purposes and intent of 31 U.S.C. 3720B and 28 U.S.C. 3201(e), that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless:

(a) A negotiated repayment schedule is established and the repayment schedule is not delinquent, or

(b) Other arrangements satisfactory to HUD are made before the award of funds by HUD.

4. Applicant has no Debarments and/or Suspensions - In accordance with 2 CFR 2424, no award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.

5. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.

6. Submitted the required certifications as specified in the NOFA.

7. Demonstrated the population to be served meets program eligibility requirements as described in the Act, and project application clearly establishes eligibility of project applicants. This includes any additional eligibility criteria for certain types of projects contained in the NOFA.

8. Agreed to Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards.

9. Met HUD Expectations - When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from the local HUD CPD Field Office, including monitoring reports and A-133 audit reports as applicable, and performance standards on prior grants. HUD will also assess renewal projects using the following performance standards in relation to the project's prior grants:

(a) Whether the project applicant's performance met the plans and goals established in the initial application, as amended;

(b) Whether the project applicant demonstrated all timeliness standards for grants being renewed, including those standards for the expenditure of grant funds that have been met;

(c) The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except HMIS-dedicated projects that are not required to meet this standard; and,

(d) Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a

10. Met HUD financial expectations – If a project applicant has previously received HUD grants, the organization must have demonstrated its ability to meet HUD's financial expectations. If any of the following have occurred, the project applicant would <u>NOT</u> meet this threshold criteria:



YES/NO

RENEW. + EXP. THRESHOLD

RENEWAL/EXPANSION THRESHOLD REQUIREMENTS

YES/NO

Project Name:			
Organization Name:		Renewal/Expansion Projects	
Project Type:	if you would like to change the project type, please do so in the	Threshold Complete	
Project Identifier:	HIC and re-copy the data to the RAW HIC DATA tab, or do so in the LIST OF PROJECTS TO BE REVIEWED.	0%	

THRESHOLD REQUIREMENTS

(a) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;

(b) Audit finding(s) for which a response is overdue or unsatisfactory;

(c) History of inadequate financial management accounting practices;

(d) Evidence of untimely expenditures on prior award;

(e) History of other major capacity issues that have significantly affected the operation of the project and its performance;

(f) History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and

(g) History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

11. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). The CoC will be required to submit a Certification of Consistency with the Consolidated Plan at the time of application submission to HUD.

CoC THRESHOLD REQUIREMENTS	
	For each requirement, select "Yes" if the project has provided reasonable assurances that the project will meet the requirement or has been given an exception from the CoC or will request a waiver from HUD. Otherwise select "No".)
Coordinated Entry Participation	
Housing First and/or Low Barrier Implementation	
Documented, secured minimum match	
Project is financially feasible	
Application is complete and data are consistent	
Data quality at or above 90%	
Bed/unit utilization rate at or above 90%	
Acceptable organizational audit/financial review	
Only serve people who are chronically homeless (if P	SH)

NEW PROJECTS THRESHOLD

NEW PROJECTS THRESHOLD REQUIREMENTS

Project Name:		
Organization Name:		New Projects
Project Type:	if you would like to change the project type, please do so in the HIC and re-copy the data to the RAW HIC DATA tab, or do so in	Threshold Complete
Project Identifier:	the LIST OF PROJECTS TO BE REVIEWED.	0%

THRESHOLD REQUIREMENTS

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

HUD THRESHOLD REQUIREMENT

1. Applicant has active SAM registration with current information.

2. Applicant has valid DUNS number in application.

3. Applicant has no Outstanding Delinquent Federal Debts - It is HUD policy, consistent with the purposes and intent of 31 U.S.C. 3720B and 28 U.S.C. 3201(e), that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless:

(a) A negotiated repayment schedule is established and the repayment schedule is not delinquent, or

(b) Other arrangements satisfactory to HUD are made before the award of funds by HUD.

4. Applicant has no Debarments and/or Suspensions - In accordance with 2 CFR 2424, no award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.

5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings.

6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.

7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are, under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.

8. Submitted the required certifications as specified in the NOFA.

9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.

10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards.

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each year's NOFA to ensure they understand and have accounted for all applicable standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:

(a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings;



YES/NO

NEW PROJECTS THRESHOLD REQUIREMENTS

Project Name:		
Organization Name:		New Projects
Project Type:	if you would like to change the project type, please do so in the HIC and re-copy the data to the RAW HIC DATA tab, or do so in	Threshold Complete
Project Identifier:	the LIST OF PROJECTS TO BE REVIEWED.	0%

THRESHOLD REQUIREMENTS

(b) For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and,

(c) Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring finding related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.

12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). The CoC will be required to submit a Certification of Consistency with the Consolidated Plan at the time of application submission to HUD.

CoC THRESHOLD REQUIREMENTS

For each requirement, select "Yes" if the project has provided reasonable assurances that the project will meet the requirement or has been given an exception from the CoC or will request a waiver from HUD. Otherwise select "No".)

YES/NO

Coordinated Entry Participation	
Housing First and/or Low Barrier Implementation	
Documented, secured minimum match	
Project is financially feasible	
Application is complete and data are consistent	
Bed/unit utilization rate will be at or above 95%	
Acceptable organizational audit/financial review	
Only serve people who are chronically homeless (if PSH)	

RENEW. + EXP. RATING TOOL

RENEWAL/EXPANSION PROJECT	RATING TOOL
---------------------------	-------------

Project Nar	ne:	_				
Organization Nar	ne:		Renewal/Expansion Projects			
Project Ty	pe:		Rating Complete	_		
Project Identif	ier:		0%	Instructio	ons on Awar	rding Points
RATING FACTOR		PERFORMANCE GOAL		POINTS AWARDED		MAX POINT VALUE
PERFORMANCE MEASURES						
Length of Stay						
Exits to Permanent Housing						
Permanent Supportive Housing	≥ 90% remain in or move to PH				out of	15
Returns to Homelessness						
Within 12 months of exit to permanent housing	\leq 15% of participants return to homelessness				out of	15
New or Increased Income and Earned Income						
Earned income for project stayers	8%+ increase				out of	2.5
Non-employment income for project stayers	10%+ increase				out of	2.5
Earned income for project leavers	8%+ increase				out of	2.5
Non-employment income for project leavers	10%+ increase				out of	2.5
	Performance Measu	res Subtotal		0	out of	40
SERVE HIGH NEED POPULATIONS						
Permanent Supportive Housing	≥ 60% of participants with zero income at entry				out of	6
Permanent Supportive Housing	\geq 70% of participants with zero means at chary	me			out of	6
Permanent Supportive Housing	\geq 80% of participants entering project from place not				out of	8
	Serve High Need Popula			0	out of	20
PROJECT EFFECTIVENESS						
Coordinated Entry Participation	\geq 100% of entries to project from CE referrals				out of	10
Housing First and/or Low Barrier Implementation	Commits to applying Housing First model				out of	15
	Project Effectivenes	ss Subtotal		0	out of	25
OTHER AND LOCAL CRITERIA					_	
CoC Monitoring Score					out of	15
-	Other and Local Crite	aria Subtotal		0	out of	15
				0	outor	15
	TOTAL SCO	RE		0	out of	100
	Weighted Ratin	g score		0	out of	100

RENEW. + EXP. RATING TOOL

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name:				
Organization Name:		Renewal/Expansion Projects		
Project Type:		Rating Complete	_	
Project Identifier:		0%	Instructions o	n Awarding Points
RATING FACTOR	PERFORMANCE GOAL		POINTS AWARDED	MAX POINT VALUE
PROJECT FINANCIAL INFORMATION				
CoC funding requested	NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab		\$	-
Amount of other public funding (federal, state, county, city)			\$	-
Amount of private funding			\$	-
TOTAL PROJECT COST			\$	-
CoC Amount Awarded Last Operating Year	NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab		\$	-
CoC Amount Expended Last Operating Year	NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab		\$	-
Percent of CoC funding expended last operating year				0%

NEW PROJECTS RATING TOOL

Project Name:				
Organization Name:	New Projects			
Project Type:	Rating Complete			
Project Identifier:	0%	Instruction	ns on Award	ding Points
RATING FACTOR		POINTS AWARDED		MAX POINT VALUE
EXPERIENCE				
A. Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in prov	iding housing similar to that proposed in the application.		out of	10
B. Describe experience with utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clipreconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with excepting status, familial status, actual or perceived sexual orientation, gender identity. Must demonstrate the project has a process to project participation is terminated in only the most severe cases.	ons of restrictions imposed by federal, state, or local law or ordinance), marital		out of	10
C. Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfac reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely sub			out of	5
Experience Subtotal		0	out of	25
DESIGN OF HOUSING & SUPPORTIVE SERVICES				-
A. Extent to which the applicant	1			
 Demonstrate understanding of the needs of the clients to be served. Demonstrate type, scale, and location of the housing fit the needs of the clients to be served Demonstrate type and scale of the all supportive services, regardless of funding source, meet the needs of the clients to Demonstrate how clients will be assisted in obtaining and coordinating the provision of mainstream benefits Establish performance measures for housing and income that are objective, measurable, trackable, and meet or exceed 			out of	15
B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, a	and acceptable to their needs.		out of	5
C. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live indepen	idently.		out of	5
Design of Housing & Supportive Services Su	ıbtotal	0	out of	25
TIMELINESS				
A. Describe plan for rapid implementation of the program documenting how the project will be ready to begin housing the days, 120 days, and 180 days after grant award.	first program participant. Provide a detailed schedule of proposed activities for 60		out of	10
Timeliness Subtotal		0	out of	10
FINANCIAL				
A. Project is cost-effective - comparing projected cost per person served to CoC average within project type.	1		out of	5
B. Audit				
1. Most recent audit found no exceptions to standard practices]		out of	3
2. Most recent audit identified agency as 'low risk'	Ĭ		out of	3

NEW PROJECTS RATING TOOL

Project Name:				
Organization Name:	New Projects			
Project Type:	Rating Complete	-		
Project Identifier:	0%	Instructio	ons on Awar	ding Points
RATING FACTOR		POINTS AWARDED		MAX POINT VALUE
3. Most recent audit indicates no findings			out of	4
C. Documented match amount.			out of	5
D. Budgeted costs are reasonable, allocable, and allowable.			out of	10
Financial Subtotal		0	out of	30
PROJECT EFFECTIVENESS				
Coordinated Entry Participation- 100% of entries to project from CE referrals			out of	10
Section V Subtotal		0	out of	10
OTHER AND LOCAL CRITERIA				
Section VI Subtotal		0	out of	0
				•
TOTAL SCORE		0	out of	100
Weighted Rating Score		0	out of	100
		Ŭ	001 01	100
PROJECT FINANCIAL INFORMATION				
		-		
CoC funding requested NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED to	b		\$	-
Amount of other public funding (federal, state, county, city)			\$	-
Amount of private funding			\$	-
TOTAL PROJECT COST			\$	-

Addendum B

Vancouver/Clark County COC Programs Monitoring Policies and Procedures

Updated: 7.26.2017

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 is changes 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.

Addendum C

Continuum of Care Overview

The CoC model was adopted by HUD in 1994 giving local communities the charge to form a primary planning and coordinating body, known as CoCs, for homeless housing and services to work toward the goal of ending homelessness. The regulations clearly define the primary responsibilities of the CoC as follows:

(a) Operate the Continuum of Care. The Continuum of Care must:

(1) Hold meetings of the full membership, with published agendas, at least semi-annually;

(2) Develop an invitation process for new members to join publicly available within the geographic at least annually;

(3) Adopt and follow a written process to select a board to act on behalf of the Continuum of Care. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years;

(4) Appoint additional committees, subcommittees, or workgroups;

(5) In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B of this part and with HMIS requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;

(6) Consult with recipients and sub-recipients to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performers;

(7) Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD;

(8) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Continuum must develop a specific policy to guide the operation of the centralized or coordinated assessment system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. This system must comply with any requirements established by HUD by Notice.

(9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

(i) Policies and procedures for evaluating individuals and families eligibility for assistance under this part;

(ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;

(iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;

(iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;

(v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and

(vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).

(b) Designating and operating an HMIS. The Continuum of Care must:

(1) Designate a single Homeless Management Information System (HMIS) for the geographic area;

(2) Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;

(3) Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.

(4) Ensure consistent participation of recipients and sub-recipients in the HMIS; and

(5) Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

(c) Continuum of Care planning. The Continuum must develop a plan that includes:

(1) Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following:(i) Outreach, engagement, and assessment;

(ii) Shelter, housing, and supportive services;

(iii) Prevention strategies.

(2) Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:

(i) Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.

(ii) Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.

(iii) Other requirements established by HUD by Notice.

(3) Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

(4) Providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area;

(5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and sub-recipients.