

SITE MONITORING GUIDE

This policy outlines the monitoring process for the Missouri Balance of State Continuum of Care (MO BoS CoC).

Purpose of Monitoring

The [HUD CoC Interim Rule](#) (24 CFR 578.7) states that Continuums of Care (CoC) are responsible for monitoring recipients. Monitoring provides information to assure that recipients are using CoC funding efficiently and effectively in accordance with federal law, HUD guidelines and standards established by the CoC. MO BoS CoC will conduct monitoring to aid on performance and technical areas in the delivery of services to the homeless population in their communities. Monitoring gives an opportunity to identify possible fraud, waste, and abuse to make certain federal funds are being used as intended, but most importantly ensures the most vulnerable in our communities seeking services are receiving the best services possible. 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.

Recipients and subrecipients should institute regular self-monitoring to check for compliance with all requirements. Self-monitoring should include monitoring for performance and assessing compliance with policies, including file review to verify appropriate documentation is being maintained. Self-monitoring can identify potential issues and allow the recipient or subrecipient to make corrections proactively in advance of external monitoring. Recipients and subrecipients may request assistance from the CoC and/or a peer project to resolve any self-identified issues.

Please note that all documents shared for monitoring purposes will be confidential and only CoC staff will have access to these documents. Any documents uploaded to a shared drive for Desk Monitoring can be deleted after the monitoring process is completed if requested by the project.

Definitions

Concern- A deficiency in program performance not based on statutory, regulatory, or other program requirements.

Sanctions or corrective action are not authorized for concerns. However, MO BoS CoC will bring the concern to the organization's attention and, if appropriate, may *recommend* (but cannot require) actions to address concerns and/or provide technical assistance.

Finding- A deficiency in program performance based on statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized.

On-Site Monitoring- Monitoring that is conducted at the organization location. This monitoring includes review of forms, client files, and supporting documentation along with staff reviews.

Approach to Monitoring

It is the intent of the MO BoS CoC to conduct monitoring for every organization that has a CoC funded project, annually. The monitoring process is intended to provide guidance and assistance along with observing progress and quality of services. The monitoring process should have open communication and on-going evaluation to make the process successful.

The overall goal of monitoring is to determine compliance, prevent/identify deficiencies, and design corrective actions to improve or reinforce project performance. We want to acknowledge the best practices that organizations have and share with others in the MO BoS CoC to increase success for all organizations and communities within our 96-County continuum.

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- Housing First
- Involving people with lived experience (PLE)
- Landlord and local government engagement
- Community partnerships (healthcare, access to mainstream resources, training collaboration, etc)
- Identifying racial inequities - furthering agency and community Diversity and Equity Initiatives (DEI)
- HMIS and DVIMS Data – completeness, accuracy, and timeliness
- Financial management – eligibility of program expenditures

Monitoring Timeline

The MO BoS CoC monitoring schedule will follow a quarterly pattern (for the calendar year) and all CoC grantees will be notified at the beginning of the year which quarter they can expect their visit. Monitoring visits typically happen in the second month of the quarter except for Quarter 1 during which visits will be conducted in March. Once notices have been sent at the beginning of the year, the MO BoS CoC monitoring schedule will be listed on the website. CoC staff will send reminders at the beginning of each quarter and then schedule a meeting with the grantee to determine the best date for monitoring and any preparation questions that they may have.

Written Notification	<ol style="list-style-type: none"> 1. Confirm date(s), length of review, and scope of the monitoring (emailed at least 30 days prior to visit). 2. Provide Monitoring Policy and Guide. 3. Specify which documents are needed <i>before</i> the visit.
Pre-Visit Review	<ol style="list-style-type: none"> 1. CoC and program leadership will work together to schedule the staff interview(s) and discuss final preparations and questions for the visit. 2. CoC staff will review HMIS data including 2 random client IDs, APR for program year, and DQP submissions. 3. CoC staff will review the prior year monitoring results and the steps taken to improve areas of concern or findings. 4. CoC staff will review grant agreement and e-snaps application of project.
Entrance Conference	<ol style="list-style-type: none"> 1. Meet on-site with the pre-determined agency and program personnel. 2. Receive files and policies listed under the Documents section of this policy. 3. Clarify purpose, scope, and daily schedule of the visit. 4. Discussion focused on agency, program, and CoC policies.
Staff Interview	<ol style="list-style-type: none"> 1. Meet with pre-determined program staff. 2. Review program policies and best practices through questions and discussion.
Document Review On-Site	<ol style="list-style-type: none"> 1. CoC staff will review 2 physical client files chosen at random. 2. CoC staff will review program policies and financials for compliance. 3. CoC staff will finalize HMIS review (2 random client IDs, DQP submissions, and APR for grant year)
Exit Conference	<ol style="list-style-type: none"> 1. Highlight grantee's areas of compliance, agency strengths, innovative or commendable practices. 2. Present areas of concern and/or findings for the program(s) and request follow-up information. 3. Provide an opportunity for the grantee to discuss any misconceptions or misunderstandings. 4. Reminders on upcoming trainings, Networking Forums, and other CoC/HUD events. 5. Determine follow up date for additional documentation.

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<p>Follow-up Monitoring Letter (within 30 days of visit)</p>	<ol style="list-style-type: none"> 1. Recognize positive areas and/or areas of significant improvement. 2. Identify fully every finding or concern. 3. Specify recommendations or corrective actions for concerns. 4. Notify agency the need for a Performance Improvement Plan (PIP) if applicable.

Documents Used for Monitoring

The following documents are **due to CoC staff at least 7 days prior** to the on-site visit.

- HMIS list of client IDs (includes current and exited participants). CoC staff will choose 2 at random to review.
- Program staff list
- Grant agreement (and amendments if applicable) for the grant year being monitored
- E-snaps application for the grant year being monitored

The following documents are **due to CoC staff upon arrival** or may be uploaded to SharePoint folder before visit.

- Organization chart
- People with Lived Experience (PLE) participation – roster of Board of Directors and/or decision-making entities within agency. This roster can also include the number of staff or volunteers with lived experience.
- 2 client files
- HUD Single Audit letter, if applicable
- General communications with HUD including last audit summary or findings
- Subrecipient agreements/procurement contracts, if applicable
- Financial policies and procedures – should include maintaining fiscal control, accounting procedures, ensuring CoC program funds are used in accordance with requirements, and communicating noncompliance
- Match documentation - should include source, in-kind tracking and MOUs, and supporting documentation if cash is used as match in supportive services
- 2 eLOCCS drawdown screenshots for each budget line item
- Supporting documentation for the provided eLOCCs drawdowns. Examples include:
 - Leasing and rental assistance – copies of leases and landlord agreements, rent tracking forms, payments for rent, rent payment requests, monthly statement showing amount requested, etc.
 - Supportive Services – timesheets for direct service employees, payroll records, employee benefits, mileage tracking if requested transportation, monthly statement showing amount for supportive services requested, etc.
 - Administration – timesheet and payroll records, employee benefits explanations, documentation for expenditures from multiple funding

sources, month statement mirrors the payment request, etc.

- Operating expenses (PSH and TH with Leasing dollars) - receipts, invoices or bills for costs to utilities, maintenance and repair, furniture, building security, and insurance. Include receipts, invoices, monthly statement of revenue and expenses for line-item expense, etc.
- HMIS – Staff time, operations and office space expenses, equipment services, and software.

□ Housing program manual and/or other standard operating policies and procedures including:

- Program intake, operation, and determining homelessness status
- Housing First policy
- Program termination policy
- CoC policies including Education Policy, Emergency Transfer Plan, Involuntary Separation & Non- Discrimination Policy, and Mainstream Benefits Policy

In addition, **HMIS grantees** will submit the following at time of arrival.

- HMIS user agreements – 2 random projects will be reviewed during the visit
- HMIS Policies and Procedures
- Training list – what has been provided in the last grant year

In addition, **SSO-CE grantees** will submit the following at time of arrival.

- 2 random regional MOUs
- Most recent evaluations and survey results of the Coordinated Entry system
- List of most recent regions identified for remediation and corresponding plans

Monitoring Outcome

CoC staff will use the combination of staff interviews, client files, HMIS data, agency and program policies, and financial documentation to answer program questions as listed in the CoC's Monitoring tool. The Monitoring Tool has been created by CoC staff to incorporate several HUD program regulations as well as CoC specific policies and priorities set forth by the CoC Grant Competition Task Group and the CoC Board of Directors. After the monitoring visit CoC staff will review the responses in all documents (staff interviews, Housing First Assessment, and Monitoring Tool) to determine the areas of program strength, areas of concern, and findings. The final determinations will be included in a Monitoring Report and Letter within 30 days of the site visit.

Programs that receive findings will be considered "projects of concern" and will be required to develop a 12-month action plan for improving performance. For more details on Performance Improvement Plans, please see the Performance Improvement Plan Policy.

Technical Assistance

Technical assistance is available in a variety of formats and from multiple partners. It is encouraged that program staff reach out to the MO BoS CoC Performance Coordinator to determine the best course of action and sources for assistance. Technical Assistance can be requested at any time, it is not dependent on monitoring outcomes.

Technical Assistance is not a one-size fits most approach and will be adapted to meet the needs of the agency, their staff, and program type. *See Appendix B for resources and links to technical assistance that can be used in conjunction with CoC staff and the HUD Field Officer.*

Appendix A

Approach to monitoring

Agencies and their respective CoC programs will be reviewed on seven areas to align with HUD and CoC priorities to better serve the homeless population in the Missouri Balance of State CoC. The following is a list of what CoC staff will use to determine program compliance.

- **Housing First** – Client file review, staff interviews, and program policy review.
 - CoC staff will use the Housing First tool designed by HUD to determine if the agency is Housing Staff by “saying it”, “documenting it”, and “doing it”. Housing First Tool can be found here [housing-first-assessment-tool](#). Housing First score to be reviewed during the Exit Conference.
- **Involving People with Lived Experience (PLE)** - Agency rosters and staff interviews.
 - The HUD requirement is that agencies have at least 1 individual with lived experience on the BOD. CoC staff will determine if the requirement is met while also gathering best practices for how agencies are going above and beyond this requirement.
- **Landlord and local government engagement** – Leadership/Entrance conference and program staff interviews.
 - CoC staff will use interviews to gather best practices on how the agency is communicating with local landlords, law enforcement, and local governments to increase awareness around Housing First and increase access to affordable housing.
- **Community Partnerships** – Entrance/Leadership Conference, staff interviews, client files, and program policies.
 - CoC staff will gauge the level of partnership with local healthcare resources and mainstream benefit providers while gathering best practices and brainstorming topics for future training opportunities.
- **Identifying racial inequities** – Leadership/Entrance Conference and staff interviews
 - Discussion with leadership team on what internal and external DEI are in place or planned for the year.
 - Discussion with leadership and staff on providing culturally appropriate services for clients.
 - Housing First assessment
- **HMIS and DVIMS Data** – Client ID list, Data Quality Plan (DQP) submissions, program APR, and EVA
 - CoC staff will check data for completeness, accuracy, and timeliness. CoC staff will choose two random clients to review in ServicePoint or DVIMs while also looking at the APR and DQP submissions for areas of improvement on performance measures.
- **Financial Management** – eLOCCs screenshots, supporting financial documents, agency fiscal policies and procedures, grant applications and contracts, and leadership interviews.
 - CoC staff will review the eligible expenses for the program by first reviewing the program e-snaps applications, grant agreement and grant

amendments (if applicable). Next, supporting financial documentation and receipts will be compared to the eLOCCS draws provide

- Match documentation will be reviewed against the application and contract making sure match was from eligible non-CoC sources and that in-kind was calculated properly.
- Discussion of Single Audit requirements.

Appendix B

CoC program staff are encouraged to work with the MO BoS CoC Grantee Support Specialist with or without a PIP. Should an agency need to develop a PIP, as outlined in this document, CoC staff will work with program staff to develop areas of assistance that best suit their needs. In the meantime, this section references helpful links and resources to common needs between TA sessions.

[Missouri Balance of State CoC website](#)

[MO BoS CoC Governing documents](#) (Including policies and program standards)

ICA's Missouri HMIS website and HMIS FAQ [here](#).

HMIS/DVIMS New User Training, MO BoS CE Program, DQP, and Missouri Reports courses are always available with training through (ICA) Institute Community Alliances.

CE information can be found on the MO BoS CoC [website](#).

[HUD AAO](#)

[HUD Continuum of Care Program Guides](#)