New York State Balance of State Continuum of Care

MONITORING POLICY

Purpose for Monitoring

The United Stated Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Interim Rule 24 CFR 578.7 states that CoCs are responsible for monitoring recipients of CoC funded projects. Monitoring provides information to assure that recipients are using CoC funds efficiently and effectively in accordance with federal law, HUD federal guidelines and standards established by the CoC. The New York State Balance of State (NYS BoS) CoC will conduct monitoring to also provide technical assistance in the areas of program design, implementation, and performance.

Approach to Monitoring

The monitoring process is intended to provide guidance and assistance along with observing progress and quality of services. The monitoring process will have open communication and on-going evaluation to make the process successful.

The overriding goal of monitoring is to determine compliance, prevent/identify deficiencies, and design corrective actions to improve or reinforce project performance. We also want to acknowledge the efforts and good practices that agencies have and share with other agencies in the NYS BoS CoC to increase success for agencies and communities throughout the state.

Monitoring Timeline

It is the intent of the NYS BoS CoC to conduct monitoring for every agency that has a CoC funded project on a two-year cycle, though monitoring may occur more frequently as necessary.

The NYS BoS CoC will coordinate with agencies to schedule monitoring visits with at least 30 days advance notice. Both the notice and monitoring form are sent to the agency in order to prepare for the monitoring. The agency may be responsible to submit all required documents by email one week prior to the on-site monitoring. Monitoring may be conducted remotely as needed.

On the day of the monitoring, all requested documentation must be prepared and presented to the NYS BoS CoC staff. It is expected that program directors, case managers and any direct line staff will be available to answer questions. Staff from the finance department should also be available to answer questions that may arise during review of the financial portion of the monitoring. On-site monitoring will also include unit visits as well as meeting with project participants.

At the conclusion of the monitoring, NYS BoS CoC staff will meet with agency staff for an exit interview that will provide a summary of the information reviewed during the visit. The interview

will consist of initial findings and concerns, discussion of successes and answers to any additional questions. Further review of materials may be conducted after the monitoring and communication will remain open if additional concerns arise throughout the entire monitoring process. Should further review be determined necessary, BoS CoC staff will inform agency staff.

Monitoring Response Letter

Upon completion of the monitoring, NYS BoS CoC staff will issue correspondence describing the results and identify any corrective actions required. NYS BoS CoC staff may request a follow-up meeting as part of the corrective action process.

When all corrective actions have been addressed and implemented, the findings will be considered resolved. In the event an agency does not respond, or the findings are unresolved, the NYS BoS staff will inform the BoS Steering Committee. The Steering Committee may issue notice of deficiency to the agency. Notice of deficiency may include sanctions such as non-eligibility to renew the project application in the following CoC competition. Monitoring letters will be shared with the grantor of funds, including but not limited to the HUD Buffalo Field Office and the Office of Temporary and Disability Assistance.

BoS Program Monitoring Form

Agency Name/Program			Date of Monitoring	
Grant Identification #				
Total Award Amount		Total Spent		
Agency Name/Program			Date of Monitoring	
Grant Identification #				
Total Award Amount		Total Spent		
Agency Name/Program			Date of Monitoring	
Grant Identification #				
Total Award Amount		Total Spent		
Agency Name/Program			Date of Monitoring	
Grant Identification #				
Total Award Amount		Total Spent		

Agency Staff Present	
BoS Staff Present	
Report completed by	

Review Questions	Response (Yes/No/NA)	Comments
Is there evidence of any Conflict of Interest? (No person who is in a position to participate in the decision making process with regard to program activities shall obtain a personal or financial interest or benefit from the activity.)		
Is there evidence that the recipient has complied with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a)?		

Is there evidence that the recipient has undertaken activates to affirmatively further fair housing? (For example - marketing the program to all eligible persons, providing fair housing counseling services or referrals, informing participants of how to file a housing discrimination complaint etc.)		
Is there evidence that the recipient has made known that housing assistance and services are available to all on a nondiscriminatory basis and has taken responsible measures to ensure that all citizens have equal access to information about programming and equal access to the assistance and services provided under the housing programs?		
Is there any evidence that the recipient is providing services in a manner that would conflict with the discrimination/sectarian requirement?		
Is there evidence that the recipient has complied with the Drug Free Workplace Act of 1988?		
Are participants charged program fees?		
Does program follow HUD eviction policies?		
If clients have been terminated, does a review of these client files show that minimum due process requirements for termination were followed?		
Is this a religious or faith-based organization? If so, are participants required to participate in inherently religious activities? Is the facility the primary place of worship? Can participants be denied benefits/services based on their religion?		

	Response (Yes/No/NA)	Comments
For programs that serve households with children, is staff person is designated as the educational liaison that will ensure that children are enrolled in school, connected to Head Start, Part C of the Disabilities Act? Is there evidence that the age and gender of a child under age 18 must not be used as a basis to for denying any family's admission to the program?		
Is there evidence of the recipient's adoption and implementation of procedures to make available information on the existence and locations of facilities and services that are accessible to persons with a handicap?		
Are there sufficient outreach procedures in place to ensure that information about the program is able to reach persons of any race, color, religion, sex, age, national origin, familial status or handicap who may qualify for admission to the program?		
Financial Documentation	**Response (Yes/No/NA)**	**Comments**
Does project receive CoC funding? If Yes, Attach a CoC funding budget outline that includes any match and leveraging used.		
Does the grantee have written procedures covering the recording of transactions, an accounting manual and a chart of accounts?		
If the grantee has a written policy manual, does it provide guidelines for controlling expenditures, such as purchasing requirements and travel authorizations?		
Does the grantee have written procedures regarding the maintenance of accounting records for the required number of years?		

Are the grantee's fiscal records and valuables secured in a limited-access area?		
Is there evidence that the staff duties are separated so that no one individual has complete authority over an entire financial transaction?		
Does the grantee have written policies for procurement? If the Agency has written policies, obtain copy for the files; otherwise, describe the Agency's policy.		
Has the grantee developed standards for avoiding conflict of interest in carrying out activities funded by federal grants dollars?		
Are applicable employees required to sign a statement indicating that they have read the policy and will comply? If yes, obtain copy for the files; otherwise, describe the Agency's policy.		
A copy of most recent audited financial statement has been reviewed.		
Did the agency expend more than $500,000 in federal grant funds? If yes, a Single Audit report is required.		
If applicable, has the Single Audit report been reviewed?		
Has the program/agency participated in events or activities related to promotion of racial equity among participants?		

BoS Rapid Rehousing Program Monitoring Form

PROGRAM REVIEW		
Review Questions		**Comments**
What RRH services are provided by the recipient?		
Is recipient spending RRH funds on eligible activities for which it was funded? Are all program activities as stated in the contract being carried out?		
Review Questions	**Response (Yes/No/NA)**	**Comments**
Does the recipient have an intake process to determine RRH participant eligibility and an understanding of the definition of homelessness or at risk of homelessness commensurate with services provided?		
Is there evidence that the recipient is correctly identifying and assisting eligible program participants?		
Does the recipient have a process to document homelessness and/or at risk of homelessness?		
Is target population, as stated in contract, being served?		
Are lead based paint regulations applicable and are they being followed?		
Is recipient and/or subcontract(s) reporting in HMIS or other approved comparable data base?		
Are grant funded staff in place?		
Is the recipient meeting the outcome goals for which it was funded?		

If providing rental assistance, is recipient and/or subcontractor using RRH rental assistance for tenant-based rentals (as opposed to project-based rentals)?		
Is recipient assisting each program participant in obtaining needed mainstream resources, which will help achieve independent living?		
Is the recipient documenting habitability inspections?		
Are financial/rental assistance payments made directly to third parties?		
Does recipient and/or subcontractor(s) have a process to manage security deposits? (Sub-recipient and/or subcontractor(s) may recover the security deposit, in which case it must be treated as program income and then may be used for a new household. Alternately, sub-recipient and/or subcontractor(s) may allow the household to keep the deposit and use it towards their next unit or allow the landlord or property management company to keep a portion of the deposit if it is needed to pay for costs incurred by the tenant such as damages to the unit.)		
Does recipient and/or subcontractor(s) have a process to ensure assistance does not exceed the allowable twenty four month limit in a 3 year period?		
Does recipient and/or subcontractor(s) have an annual recertification process?		
Does recipient and/or subcontractor(s) have a process that provides reasonable assurances that same cost types are avoided (i.e. rental assistance is not provided to section 8 recipients)?		
Does recipient and/or subcontractor(s) have a process to calculate the rent reasonableness and assuring rents are within FMR when providing rental assistance?		
Is a lease in place when providing rental assistance?		
Does recipient and/or subcontractor(s) have a process to determine the level of financial/rental assistance needed? Does this meet client need?		

Is there evidence participants are being served with case management at least monthly? Is level of assistance adequate?		
What is the average case load per case manager? Is it reasonable?		
What is the Housing Stability rate - % who remained or exited to permanent housing?		
Total Income - % of participants who maintained or increased total income at program exit or annual recertification? Explain any decreases.		
Data Quality - percentage of data missing from any one element is over 50%.		
Are Case Planners developing plans with participants to retain permanent housing after RRH assistance ends?		
Does the recipient have a written process for terminating assistance to a program participant? *Specific to rental assistance*, does process indicate there is written notice to participant, review of decision and prompt notice to participant on final decision?		
Is there evidence that the program is operating on a Housing First model?		
PROGRAM FILE REVIEW		
Review Questions	Response (Yes/No/NA)	Comments
Are case files/ program records maintained by the recipient?		
Is the confidentially of case files/program records safeguarded?		
Is there evidence client is from target population?		
Is homelessness documented before receiving services?		
Are referral sources and contacts documented?		
Is there documentation of services provided?		

Are client case plan outcomes appropriate?		
Are case records up to date?		
Are case files acceptable? 5 files should be reviewed. **List files reviewed in documentation section.**		
CLIENT INTERVIEW (when available)		
Review Questions	Response (Yes/No/NA)	
Is client aware of how s/he can participate in policy making and operations, or how other homeless or formerly homeless clients are participating in policy making?		
Is client aware of his/her housing options for the future?		
Is client aware of the termination policy?		
What aspect(s) of the program works particularly well for the client?		
REPORTING REVIEW		
Review Questions	Response (Yes/No/NA)	Comments
If applicable, has the recipient submitted required program reports in a timely manner?		
Is recipient prepared to participate in the HMIS data warehouse?		
If applicable, does the lead agency monitor subcontractors?		
How often? What is the outcome of monitoring?		
COORDINATED ENTRY		

Review Questions	Response (Yes/No/NA)	Comments
Are all available housing opportunities filled through the Coordinated Entry System?		
Is there evidence in the file of CE referral?		
Are program staff on the CE committee? Are program staff knowledgeable of the CE process?		
How often does the CE Committee meet?		

GENERAL REQUIREMENTS

Review Questions	Response (Yes/No/NA)	Comments
Do staff appear knowledgeable about RRH and the program's requirements?		
Does the program operate using the Balance of State Standards Manual?		
Is the recipient spending RRH funds at a pace consistent with fully exhausting funds by the end of the contract term?		
Is there any barrier to submitting vouchers in a timely fashion documenting line items being drawn from, balance remaining and proof of expenditures?		
Is there sufficient oversight of accounting/ budget controls with policies in place? Do they provide reasonable assurances to mitigate fraud?		
Are there any red flag issues? If so, how are they being addressed?		
Are there any compliance issues? If so, what corrective actions are being taken?		
Has this program been monitored by the HMIS administrator, if so, what was the outcome?		
Is the program well integrated into the overall structure of the agency? What other programs are administered by the recipient?		

OVERALL COMMENTS/SUGGESTIONS/RECOMMENDATIONS

BoS Permanent Supported Housing Program Monitoring Form

PROGRAM REVIEW		
Review Questions		**Comments**
What PSH services are provided by the recipient?		
Is recipient spending PSH funds on eligible activities for which it was funded? Are all program activities as stated in the contract being carried out?		
Review Questions	**Response (Yes/No/NA)**	**Comments**
Does the recipient have an intake process to determine PSH participant eligibility and an understanding of the definition of homelessness or at risk of homelessness commensurate with services provided?		
Is there evidence that the recipient is correctly identifying and assisting eligible program participants?		
Does the recipient have a process to document homelessness and/or at risk of homelessness?		
Is target population, as stated in contract, being served?		
Are lead based paint regulations applicable and are they being followed?		
Is recipient and/or subcontract(s) reporting in HMIS or other approved comparable data base?		
Are grant funded staff in place?		
Is the recipient meeting the outcome goals for which it was funded?		

Question		
What is the occupancy rate for the past 3 months?		
What is the Housing Stability rate - % who remained or exited to permanent housing?		
Total Income - % of participants who maintained or increased total income at program exit or annual recertification? Explain any decreases.		
Data Quality - percentage of data missing from any one element is over 50%.		
Is recipient assisting each program participant in obtaining needed mainstream resources, which will help achieve independent living?		
Is the recipient documenting habitability inspections?		
Are financial/rental assistance payments made directly to third parties?		
Does recipient and/or subcontractor(s) have a process to manage security deposits? (Sub-recipient and/or subcontractor(s) may recover the security deposit, in which case it must be treated as program income and then may be used for a new household. Alternately, sub-recipient and/or subcontractor(s) may allow the household to keep the deposit and use it towards their next unit or allow the landlord or property management company to keep a portion of the deposit if it is needed to pay for costs incurred by the tenant such as damages to the unit.)		
Does recipient and/or subcontractor(s) have a process to calculate the rent reasonableness and assuring rents are within FMR when providing rental assistance?		

Review Questions	Response (Yes/No/NA)	Comments
Is a lease in place?		
Does recipient and/or subcontractor(s) have a process to determine the level of financial/rental assistance needed? Does this meet client need?		
Is there evidence participants are being served with case management at least monthly? Is level of assistance adequate?		
Are there policies/procedures in place to ensure that turnover beds are being prioritized for the chronically homeless?		
Does recipient and/or subcontractor(s) have a process to determine the level of financial/rental assistance needed? Does this meet client need?		
Does the recipient have a written process for terminating assistance to a program participant? Does process indicate there is written notice to participant, review of decision and prompt notice to participant on final decision?		
Is there evidence that the program is operating on a Housing First model?		
PROGRAM FILE REVIEW		
Review Questions	Response (Yes/No/NA)	Comments
Are case files/ program records maintained by the recipient?		
Is the confidentially of case files/program records safeguarded?		

Is there evidence client is from target population?		
Is there documentation of disability signed by an appropriate credentialed person?		
Is homelessness documented before receiving services?		
Are referral sources and contacts documented?		
Is there documentation of services provided?		
Are client case plan outcomes appropriate?		
Are case records up to date?		
Are case files acceptable? 5 files should be reviewed. **List files reviewed in documentation section.**		

CLIENT INTERVIEW (when available)		
Review Questions	Response (Yes/No/NA)	Comments
Is client aware of how s/he can participate in policy making and operations, or how other homeless or formerly homeless clients are participating in policy making?		
Is client aware of his/her housing options for the future?		
Is client aware of the termination policy?		
What aspect(s) of the program works particularly well for the client?	■	

REPORTING REVIEW		
Review Questions	Response (Yes/No/NA)	Comments
Has the recipient submitted APR to HUD in a timely manner?		
Is recipient prepared to participate in the HMIS data warehouse?		
If applicable, does the lead agency monitor subcontractors?		
How often? What is the outcome of monitoring?		
COORDINATED ENTRY		
Review Questions	Response (Yes/No/NA)	Comments
Are all available housing opportunities filled through the Coordinated Entry System?		
Is there evidence in the file of CE referral?		
Are program staff on the CE committee? Are program staff knowledgeable of the CE process?		
How often does the CE Committee meet?		
GENERAL REQUIREMENTS		
Review Questions	Response (Yes/No/NA)	Comments
Do staff appear knowledgeable about PSH and the program's requirements?		
Does the program operate using a standards manual?		

Is the recipient spending PSH funds at a pace consistent with fully exhausting funds by the end of the contract term?		
Is there any barrier to submitting vouchers in a timely fashion documenting line items being drawn from, balance remaining and proof of expenditures?		
Is there sufficient oversight of accounting/ budget controls with policies in place? Do they provide reasonable assurances to mitigate fraud?		
Are there any red flag issues? If so, how are they being addressed?		
Are there any compliance issues? If so, what corrective actions are being taken?		
Has this program been monitored by the HMIS administrator, if so, what was the outcome?		
Is the program well integrated into the overall structure of the agency? What other programs are administered by the recipient?		
OVERALL COMMENTS/SUGGESTIONS/RECOMMENDATIONS		

BoS Monitoring Scorecard			
Metric	**Description**	**Score**	**Max Score**
Occupancy (PSH) **OR**	≥90% = 10 pts 80-89% = 5 pts 70-79% = 2 pts <70% = 0 pts		10
Number Served in Relation to Contract (RRH)	Number of households served is in line with contract goals.		
Spending	≥90%=10 pts 80-89%=5 pts 70-79%=2 pts <70%= 0 pts		10
Data Quality	Percentage of data missing from any one element: ≥50% = 0 pts 1-49% = 5 pts 0% = 10 pts		10
Program Model	Housing First Yes = 10 pts No = 0 pts		10
	Utilization of Coordinated Entry Yes = 10 pts No = 0 pts		10
Services Provided	Case Management provided is adequate for client need. Yes = 10 pts No = 0 pts		10
	Financial assistance provided is adequate for client need. Yes = 10 pts No = 0 pts		10
Community Need	Availability of eligible participants as evidenced by CE list and/or other data and community discussion. -Yes (more people on CE list that fit eligiblity criteria than program has available) = 30 pts -Somewhat (small project scope) = 15 pts -No (target pop of project is not representative of community) = 0 pts		30
		0	**100**

Summary

Risk of Reallocation	
High Risk	under 60
Medium Risk	60 to 80
No Risk	over 80
Steering Committee and HMIS/Data Committee will be notified of results.	