



Kansas Statewide
Homeless Coalition

2020

**Kansas Balance of State Continuum of Care
Monitoring Policies and Procedures**

Approved by
CoC Board of Directors
6/25/2020

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Monitoring Policies and Procedures

COC PERFORMANCE AND MONITORING

The Coalition is responsible for collecting and reporting all HUD-required system performance data and will establish performance targets for each program type. The Coalition is further charged with consulting with CoC member agencies to establish the means of:

- Monitoring performance of CoC Program Grant recipients and sub-recipients
- Evaluating outcomes of the CoC Program Grant recipients and sub-recipients
- Taking action against poor performers in an ongoing fashion

Performance measures will include priorities of the U.S. Department of Housing and Urban Development (HUD) and community priorities and needs

Site Monitoring

Each CoC Program Grant Recipient will undergo a site monitoring at least once every 24 months. The Coalition staff conducts on-site monitoring on a biannual (every other year) basis. The on-site monitoring visits are to assure compliance with applicable federal regulations governing administrative, financial, and programmatic operations and to ensure agencies are achieving performance objective within scope and schedule.

Monitoring visits involves:

- Determine if the CoC Program Grant-funded activity is meeting Federal Objectives
- Determine agency occupancy rates
 - Occupancy rate is determined through the APR to date.
- Determine client eligibility standards
 - Client eligibility is monitored for compliance through the auditing of ten (10) to fifteen (15) percent of randomly selected client files for the current year.
 - Files will be examined to ensure all required contents including but not limited to eligibility source documentation, case notes, consent forms, HMIS records and other related documentation.
- Determine the timeliness, accuracy, and completeness of HMIS Data Collection. This will be evaluated against HMIS Data Quality Reports.
- Determine that the agency's financial management processes are adequate, through the review of expenditure rates and timeliness of fund withdrawals from the HUD LOCCS system. The Coalition will review LOCCS receipts and the grant balance report to make such evaluation.
- Determine whether agencies are carrying out activities as described in contracts, participation agreements, Memoranda of Understanding (MOU), or other collaborative agreements.
- Determine whether costs charged to the project are eligible and allocable
- Determine whether agencies are maintaining financial management systems in accordance with 2 CFR §200 Subpart D.
- Determine if a conflict of interest policy exists.

- Ensure required records are maintained in compliance with federal regulations.
- Ensure agency compliance with procurement requirements.
- Ensure real or personal property acquired with CoC Program Grant or ESG funds is used for the purpose specified in the grant agreement.
- Ensure program income is reported and utilized consistent with HUD regulation
- Ensure compliance with Coordinated Entry System and Housing Priority List requirements
- Other monitoring subjects may occur to align with HUD monitoring requirements or recommendations.

Risk Assessment

A risk assessment may be conducted at the beginning of the program year to determine which agencies requires more comprehensive monitoring. Agencies which are considered “High Risk” may include but are not limited to:

- Agencies new to the CoC Program Grant
- Agencies with previous compliance or performance problems.
- Agencies undertaking activities for the first time.
- Agencies that have experienced turnover in key staff positions
- Agencies that submit late, incomplete, or incorrect reports; or agencies that do not consistently submit reports.
- Agencies not meeting performance and/or expenditure objections
- Newly formed non-profit agencies

Remote Audit/Monitoring

The Coalition will conduct a remote audit of all CoC Program Grant Projects at least annually. The review will examine the following items:

- An Annual Performance Report for the grant to date
- Line of Credit Control System (LOCCS) draw report
- Homeless Management Information System (HMIS) Data Quality Report (in collaboration with the HMIS Data Usage & Reports committee)
- CoC Program Policies and Procedures

Any information that is deemed below expected performance will be addressed by the Coalition with the recipient, developing strategies to improve performance. If it is determined that there are significant issues and concerns related to performance because of the remote audit/monitoring, the Coalition may initiate a site monitoring outside of the monitoring schedule.

Notification

The Coalition will provide the agency with written notification no less than fifteen (15) days prior to the monitoring visit or remote audit/monitoring. The notification letter will be sent to the agency’s board chairperson and Executive Director, or another designee, by email and a hard copy in the mail. This notification advises the agency personnel of the materials to be reviewed and provides information related to the anticipated duration of the visit.

At the onset of the monitoring visit, the Coalition staff will conduct an Entrance Interview with the designated agency personnel. After the monitoring session has been completed, the Coalition staff will conduct an Exit Interview, if requested, with the agency director and designated agency staff.

Monitoring Results and Response

Within the thirty (30) days of the agency monitoring visit, the Coalition will send written communication to the agency's board chairperson and director which details the results of the monitoring visit. The monitoring letter will provide recommendations for program improvement and corrective actions to be undertaken to ensure performance and compliance deficiencies are corrected.

The Monitoring Results letter will notate deficiencies in the operation of the program and/or lack of compliance with federal regulations/CoC Policies and procedures. These deficiencies may take the form of Findings, Concerns or Recommendations.

1. **Finding:** A violation of law, regulations or policies that can result in a sanction. All findings must be cleared prior to the receipt of subsequent allocations of CoC HUD funds.
2. **Concern:** A matter that, if not properly addressed, can become a finding and can ultimately result in a sanction.
3. **Recommendations:** A suggestion to enhance agency capacity to provide needed services/activities. Such recommendations are included for consideration by executive staff and agency boards. These recommendations do not have to be formally addressed or implemented; however, it is strongly advised.

Agency staff will have thirty (30) days to respond to the monitoring letter and to resolve all the findings and/or concerns addressed in the monitoring letter. The Coalition will work with the agency staff to provide any applicable technical assistance and/or training.

AGENCY PERFORMANCE ISSUES

When an agency is determined by the Coalition to have performance below expectations or which are not in compliance with the CoC policies and procedures or HUD regulations, the Coalition shall provide the agency with technical assistance or other training, to the maximum extent practicable, prior to the establishment of any sanctions or corrective actions.

Sanctions

In the event of poor performance by an agency, the CoC may apply progressive sanctions that may include, but are not limited to:

- Technical Assistance requirements for additional training
- Letter to the agency's board of directors
- More frequent reporting requirements
- Increased monitoring activities
- Probationary status
- Temporary suspension (2 CFR §200.338)

- Involuntary Reallocation of funds for the next program year
- Non-renewal of contract for the next program year
- Fund repayment
- Project termination

Sanction Appeals

An agency wishing to appeal the decision of the Coalition staff must submit a written request for review to the Coalition Executive Director within seven days of the sanction notice decision. The Executive Director, upon investigation and review, will respond to the concern in writing within 10 days of the original request for review. An agency may then appeal this decision in writing within seven days to the Board of Directors. Board consideration will occur at the next available meeting of the Board of Directors, will respond in writing to the agency with the decision of the Board of Directors within ten days of the Board of Directors meeting. Decisions of the Board of Directors are final.