



SAN DIEGO
**Regional Task Force
on Homelessness**

2023 CoC Program Monitoring Instruction Guide



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Introduction

As a Continuum of Care (CoC), Regional Task Force on Homelessness (RTFH) must establish and maintain standard operating procedures for ensuring the region's CoC Program funds are used in accordance with the requirement established in 24 CFR Part 578. All CoC funded programs must be monitored for compliance with federal regulations, rules, guidelines, CPD Notices, and should also adhere to national best practices.

The goal of the RTFH's monitoring process is to evaluate and assess all CoC funded programs in the following areas: program performance, data quality, quality assurance, and improvement strategies. All CoC funded programs are required to operate in alignment with all CoC and HUD standards. Annual monitoring will support our overall goal of producing a high quality and productive Continuum of Care program, that meets our mission to make homelessness rare, brief, and non-recurring. In areas that need improvement, RTFH will provide technical assistance, and if necessary, will request corrective action and/or will report serious matters of concern to the U.S Department of Housing and Urban Development (HUD) as required.

Through monitoring, RTFH will address and help resolve performance concerns related to policies, procedures, and outcomes. The following document contains a step by step procedure that has been streamlined to create a clear and efficient system. We look forward to partnering with agencies to improve our region's homeless response system.

If you have any questions on the following document the RTFH's monitoring staff are here to provide clarification and can be reached at the following:

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2023 CoC Program Monitoring Process Policy

Introduction

The overall goal of the San Diego City and County Continuum of Care Monitoring is to produce a high quality and productive Continuum of Care program by:

- Addressing and helping resolve performance concerns related to policies, procedures, and outcomes.
- Evaluating CoC-Funded program data in efforts to improve data quality.
- Proactively assisting CoC funded projects with efforts to comply with Department of Housing and Urban Development (HUD) regulations and established CoC standards.
- Providing guidance and Technical Assistance (TA) opportunities to all CoC-Funded projects.
- Ensuring all CoC-Funded programs are being consistent in their service delivery and program implementation.

Program Monitoring

The Regional Task Force on Homelessness (the Collaborative Applicant), will establish and maintain standard procedures for ensuring that Continuum of Care (CoC) Program funds are used in accordance with federal requirements, and will establish and maintain sufficient records to enable the U.S Department of Housing Development (HUD) to determine whether the recipient and its subrecipients are meeting the requirements of 24 CFR Part 578.

To support this role and responsibility, CoC Program monitoring activities will include programmatic management and compliance as outlined in 24 CFR Part 578 identified in this policy. The United States Department of Housing and Urban Development (HUD) maintains responsibility for monitoring all CoC recipients, and this will include monitoring a sample of subrecipients when a recipient is selected for HUD program monitoring.

Communication Strategy

Regarding the timely follow-through on monitoring activities, RTFH aims to work collaboratively, not punitively, with monitored agencies and will provide clear communication and expectations throughout all components so that activities can be successfully fulfilled. Additionally, RTFH has established a protocol to provide 3 reminders to agencies regarding missed deadlines. After 3 reminders have been issued, RTFH will make note of any incomplete actions and/or activities in the monitoring report.



Program Selection

Monitoring Selection: RTFH will monitor all CoC funded programs on an annual basis. In January of the monitoring year RTFH will send out, via email, the CoC Program Monitoring Schedule that includes all important dates, deadlines, and schedule for each monitoring cohort. It is recommended that agencies abide by the monitoring schedule, however, please notify Chief Program Officer Kat Durant kathryn.durant@rtfhsd.org as soon as possible if your agency has a schedule conflict.

Methods

RTFH will utilize three monitoring tools, a current APR of the program, and will conduct one Program On-Site Visit. The 3 monitoring tools consist of a: Grant Overview Questionnaire, Desk Audit Tool, and Agency Evaluation Tool. For 2023, RTFH will select the lowest ranking program by agency for an On-Site Visit as determined by the FY 2022 CoC NOFO Final Ranking. For all YHDP programs that were unranked, RTFH will monitor all permanent housing YHDP programs. If an agency does not have a permanent housing program, another program will be selected for monitoring based on highest need. All monitoring tool submissions will be completed through Alchemer, a survey software platform used by the San Diego Continuum of Care.

Update as of 1.15.2023. For our YHDP subrecipients you will only be required to fill out the Grant Overview Questionnaire and the new [2023 Subrecipient Monitoring Tool](#) if you are a provider with only a YHDP subrecipient award.

Remote Monitoring Tools

- **Grant Overview Questionnaire:** Each project will start the monitoring process by completing a grant overview questionnaire containing questions that will cover the history of the grant, special populations served, family or individual project, project-based or scattered site, and other funding sources. If an agency has been awarded with more than one grant, a separate questionnaire will need to be completed for each grant. A copy of the questionnaire can be found under the [CoC monitoring section of RTFH's website](#).
- **Desk Audit Tool:** The desk audit is a tool used to evaluate policies and procedures in place at the agency to ensure compliance with HUD regulations and local priorities. Because there are many acceptable ways to operate a program, for each question the agency/project provides a description of how they comply, followed by uploading supporting documents/evidence. A deeper



audit will happen during the on-site visit and will focus on the lowest ranked CoC funded program. The topics covered in the desk audit tool include, HMIS policies and procedures, staff training and support, supportive services, resource linkages, and program management policies. A copy of the Desk Audit Tool can be found under the [CoC monitoring section of RTFH's website](#).

- **Agency Evaluation Tool:** The agency evaluation tool is an opportunity for the project to reflect on performance and challenges related to practices that are priorities in our community. It is an opportunity for the agency to self-evaluate their project and discuss areas in which they would like to request technical assistance (TA). Topics covered in the agency evaluation tool include homeless and chronic homeless definitions, recordkeeping, coordinated entry, enrollment, housing, eviction prevention, data collection, staff development, service provisions, and grant management. Question types include narratives, checkboxes, Yes/No, and rating scales. The self-assessment also provides an opportunity for the project to identify additional TA needs related to performance on the intent to Renew or the Local Evaluation. The Self-assessment PDF form is available under the [CoC monitoring section of RTFH's website](#).

On-Site Visit

All CoC funded agencies will be scheduled for one program on-site visit on an annual basis. When an agency receives notification that their monitoring window is soon approaching (For 2023 one month in advance) a date, time, and meeting location will be confirmed. 2 CoC Staff will be in attendance. Any pertinent agency staff is requested to be present during an on-site visit. The following is a sample agenda on a typical On-Site Monitoring Visit.

Agenda

1. *Welcome and Introductions*
2. *Monitoring Expectations*
3. *Collection of any missing requirements or documentation*
4. *Program Site Tour*
5. *Data Privacy and Security Check*
6. *Program Client File Review*
7. *Review of Final Summary Report and or TA Plan*
8. *Closing*



The CoC funded program that has been selected for an on-site visit can be found on the [2023 CoC Program Monitoring Schedule](#).

The following are **3 key components** of an on-site visit.

1. Data Privacy and Security Check

While on-site 2 CoC Staff will check that all client's files (physical or electronic) are being properly secured and meet specific Confidentiality and Security Requirements for HMIS data. Physical records shall be kept in individual locked files or in rooms that are locked when not in use. Records in use (i.e. on the desktop) shall be maintained in such a manner as to prevent exposure of information to anyone other than the user directly utilizing the record. Electronic files will be checked for password protection and passwords should be secured and not shared. For more information regarding HMIS data Privacy and Security, please reference the [HMIS Policies and Procedures Manual with Appendices](#) and [2004 HMIS Data and Technical Standards Final Notice](#).

2. Program Client File Review

The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services. A cross reference between the physical files and HMIS database is performed for areas such as: consent, enrollment, move-in dates, housing status, and income. When selecting participant files, RTFH will choose a cross-section of files that will include: participants who have recently exited, who have recently enrolled, who have long periods of program enrollment, and/or have been housed. RTFH will send the agency the selected list of HMIS Client ID's 3 business days prior to the scheduled on-site visit so staff may retrieve the files. To prepare for the program file review, an agency may reference the [CoC Documentation and Record Keeping Review Checklist](#) and the [On-Site Monitoring Tool](#).

3. Monitoring Summary Report

Before the end of the on-site visit a summary report will be completed. The following could be found in a Monitoring Summary Report.

- a) A *concern* is a deficiency in program performance and may result in a finding if the concern is not corrected by the requested date in the Technical Assistance or Corrective Action Plan.



- b) A *finding* is a deficiency in program performance based on material non-compliance with a statutory, regulatory, or program requirement for which sanctions or corrective actions are authorized. A *finding* depending on the nature may be immediately reportable to HUD, or invoke other sanctions as defined by 24 CFR 578, a Continuum of Care responsibilities.
- c) If needed, a Technical Assistance Plan will address concerns, with a list of action(s) and measurable goals to correct the problem(s) within a reasonable timeframe.
- d) If needed, a Corrective Action Plan will address all concerns and/or findings with a list of actions and measurable goals to correct the problem(s)
- e) The CoC reserves the right to request immediate corrective action for housing quality standards issues, or other issues that may affect the health and safety of consumers, and reserves all rights under federal law in regards to legal compliance.

Results

If during the on-site visit a concern, finding, and/or recommendation has been identified, it will be noted on the agency's Summary Report. In the Summary Report, is a form that lists requested actions which identify the area where corrections or updates need to be made to policies, procedures, or participant files. RTFH may also address areas in which there are no requested actions, but where recommendations may be made to help strengthen policies or procedures. The agency will be asked to update the form with corrective actions taken within 6 weeks of the end of the monitoring window. RTFH will review the updates at that time and advise the agency if a significant item of noncompliance remains. Agencies will not be required to resubmit documentation, but the agency may request further review of updated policies and procedures as part of the TA plan.

Technical Assistance

Types of technical assistance may include formal or informal discussions, referrals to training, special/tailored training sessions, referrals to written technical assistance articles or resources, feedback on drafted or revised policies, and referrals to other content experts within or outside of San Diego's CoC. The process of completing monitoring components and receiving results from RTFH is also considered technical assistance due to the potential for agencies to develop additional understanding of requirements and practices by participating.



Step by Step Procedure

It is recommended to reference actual deadlines, which are provided in the [2023 CoC Program Schedule](#).

1. CoC Program Monitoring Notice

- CoC staff will send a monitoring notification at least 2 weeks prior to CoC Program Monitoring Start Date Window. For 2023, RTFH will aim to provide 1-month prior notice.
- Agency shall begin preparing responses and gathering requested documentation for all 3 monitoring tools. *For YHDP Subrecipients only Grant Overview Questionnaire and Subrecipient Monitoring Tool.*
- A CoC Staff Member will initiate the scheduling of the On-Site Monitoring Visit at this stage.

2. CoC Program Monitoring Start Date Window

- Start of CoC Program Monitoring Window. CoC Program Monitoring Window is approximately 30 days.

*****All 3 monitoring tools are due via Alchemer based on agency's scheduled monitoring start date. For YHDP Subrecipients only 2***.**

3. CoC Program Evaluation

- CoC Staff will evaluate tool submissions and will review HMIS data from the APR.

4. Provide Client UIDs for File Review

- CoC staff will send the agency a list of HMIS UIDs for review at least 3 business days prior to scheduled on-site visit so staff can retrieve the

5. On Site Monitoring Visit

- 2 CoC Staff Members will meet with agency staff on site to complete a targeted file review and Data Privacy and Security Check.
- On-Site Visits are scheduled within the last two weeks of the monitoring window.

6. CoC Program Monitoring Closing

- After the on-site visit a CoC staff will send out closing remarks and/or updates that were made to the final Monitoring Summary Report.
- 6 weeks after monitoring window ends, the agency shall submit a completed form to update the CoC on any outstanding actions taken to address areas identified in the summary report.



All Monitoring Documents and Resources

[2023 CoC Program Monitoring Schedule](#)

[Grant Overview Questionnaire](#)

[Desk Audit Tool](#)

[Agency Evaluation Tool](#)

[Documentation and Record Keeping Review Checklist](#)

[CoC Program Monitoring Tool](#)

[2023 Subrecipient Monitoring Tool](#) (For providers with only a YHDP Subrecipients Award)

CoC Monitoring Resources

- [The RTFH CoC Monitoring Policy](#) was adopted by the RTFH Board of Directors effective 1/17/2019.
- [CoC Draft Policy Language](#) is available for use by CoC programs for adoption if no such policy is in place in order for programs to be in compliance with CoC requirements. These have been drafted based on the Code of Federal Regulations for CoC programs ([24 CFR § 578](#)).
- [Housing First Checklist](#) (updated September 2016)
- [Housing First Assessment Tool 2022](#)
- [Definition of Homelessness and Record Keeping Requirements](#)
- [Flowchart of HUD's Definition of Chronic Homelessness](#)
- [Sample Chronic Homelessness Documentation Checklist](#)
- [Criteria for Defining Homeless](#)
- [Third Party Verification of Homeless Status – San Diego City and County CoC – updated](#)
- [Observation of Homeless Status Form – San Diego City and County CoC – updated](#)
- [Self-Certification of Homeless Status – San Diego City and County CoC – updated](#)
- [Verification of Disability Form – San Diego City and County CoC](#)
- [Chronic Homelessness Documentation Form – San Diego City and County CoC Standard Form](#)
- [CoC Program Homeless Definitions and Recordkeeping Instructions](#)
- [Imminent Risk of Homelessness Certification Form – San Diego City and County CoC Standard Form](#)
- [Dedicated Plus Verification Packet-San Diego City and County CoC Standard Form](#)

Rent Reasonableness

- [Rent Reasonableness checklist](#) with instructions for how to use it
- [Rent Reasonableness and FMR guide](#)
- [Rent Reasonableness calculation](#)

Additional resources can be found on our [CoC monitoring page on the RTFH website](#).