

Alabama Balance of State
Continuum of Care
Monitoring Process

Handbook for Monitoring the AL-507 Continuum of Care (CoC) Program

This Handbook refers to the Monitoring process of the Continuum of Care Annual Competition Projects and the Emergency Solutions Grant.

Introduction

The Alabama Rural Coalition for the Homeless, Inc. has been designated by AL-507 as the recognized lead agency, collaborative applicant, and Homeless Management Information System (HMIS) administrator for AL-507 within the Alabama Balance of State Continuum of Care Program. This program encompasses 42 counties.

As the collaborative applicant, ARCH assumes responsibility for program monitoring, evaluation, and reporting of all CoC and Emergency Solutions Grant (ESG) funded programs within the Balance of State.

The purpose of the AL-507 Monitoring Handbook is to adopt a deliberate and systematic approach to enhancing the performance of homeless programs. The U.S. Department of Housing and Urban Development (HUD) continues to place significant emphasis on evaluating CoC Homeless Assistance Program performance as a requirement for federal funding. Program performance is a crucial factor in the annual CoC application process and plays a vital role in the success of the overall system. The program monitoring process outlined in this handbook will support AL-507's ongoing efforts to improve performance.

Monitoring Timeline (Reviews may be onsite or as a Desk monitoring)

14 days prior to monitoring – ARCH Notifies agency and schedules monitoring Date

No later than 14 days after notification - Documents due to ARCH

1 to 2 days before monitoring visit – ARCH sends client file selection to agency

No later than 21 days after monitoring notification– Monitoring visit/Desk Review

No later than 30 days after monitoring – ARCH sends final monitoring report

Continuum of Care Programs – Monitoring Process Brief

ARCH will conduct monitoring reports for CoC projects to assess the progress of recipients in adhering to HUD compliance and achieving the project goals established in the initial program application and by the CoC Board of Directors. Programs that receive funds through the Continuum of Care grant competition will be required to undergo a monitoring review after completing the first six months of the program year. The review will cover the following areas:

- HUD Compliance
- Desk Review
- Performance Review
- HMIS Compliance

Around 14 days before the completion of the first six months of the program year, ARCH will send an email to the designated contact person, notifying them of the upcoming review for the program. The requested documents must be submitted to ARCH no later than two weeks after reaching the six-month mark of the program. An on-site review will be conducted to discuss the results and complete the project review. A monitoring report will be generated, and the outcomes will be shared with the designated project contact. The final report will present data and provide an opportunity for organizations to analyze and develop improvement strategies for the remainder of the program year. The monitoring reports may be assessed by the CoC Board of Directors, respective committees, and included in funding competition materials.

More information on this process can be found below.

HUD Compliance

In accordance with HUD's Internal Wellness Top Ten Checklist, ARCH will conduct a thorough review of the following documents and items during a project's monitoring:

- Standard Operating Policies and Procedures, including:
 - Program intake process to determine "homeless/at risk of homeless" status
 - Program operations
 - Recordkeeping practices
 - Oversight and monitoring of subrecipients, if applicable
- Financial Policies and Procedures, covering:
 - Fiscal controls and accountability
 - Accounting procedures
 - Procurement protocols
 - Compliance with CoC program funding requirements
- Violence Against Women Act (VAWA) Policy and Emergency Transfer Plan Template
- Antidiscrimination/Fair Housing Policy and Compliance
- Termination Policy
- Housing First Policy
- Environmental Review, if applicable
- Designation of staff responsible for enrolling children served in school and connecting them to appropriate services, if applicable

Additional documentation and information may be requested as necessary. It is essential that all requested documents are submitted by the specified deadline to receive credit in this section. These documents will be requested ahead of the on-site review to ensure a comprehensive assessment.

File Review

During the monitoring, ARCH will randomly select either 10 client files or 10% of client files, whichever is greater, for a comprehensive review of completeness. Programs will receive prior notification, 1-2 days in advance, specifying which client files will be reviewed. In accordance with HUD's Internal Wellness Top Ten Checklist, the client files selected for review may include the following documentation (all sections may not be applicable to specific programs or vary by program):

- Documentation of participant entry into the HMIS or a comparable database.
- Documentation of participant screening through the coordinated entry system.
- Documentation demonstrating homelessness, at risk of homelessness, or disability at intake (Participant Eligibility).
- Documentation of ongoing assessment of service needs for all participants and adjustments made to services as necessary.
- Documentation of initial and follow-up Housing Quality Standards inspections conducted at least annually.
- Leasing and rental assistance documentation and compliance, which includes:
 - Presence of an occupancy agreement, lease, or sublease in the file (for individual units).
 - Signed lease agreements of at least one year, renewable on a monthly basis and terminable only for cause, for all program participants.
 - Rental amounts charged meeting the standards of Fair Market Rent (FMR) or rent reasonableness.
 - Income requirements compliance as outlined in 24 CFR Part 578.77.
 - Compliance with lead-based paint requirements as specified in 24 CFR Part 35, if applicable.
- Examination of income at intake and at least annually for all program participants by the recipient or subrecipient.
- Implementation of Housing First approach, which includes:
 - Program accessibility without requiring commitment to supportive services, sobriety, or excellent rental/financial history.
 - Explanation of reasons, if any, for denying access to the program.
 - Measures taken to ensure client-driven housing and service goals.

Performance Review

To evaluate program performance, performance reviews will assess the program's performance during the grant year. Agencies will be responsible for submitting the required documentation by the specified deadline. The documentation should include an eLOCCS screenshot or any other financial statement that demonstrates the program's current spend-down status. If no funds have been drawn/expended it will not trigger a review. However, it will trigger the need for ongoing Technical Assistance. The following aspects will be reviewed as part of the evaluation:

- Review of the program's Annual Performance Report (APR) up to the current date.
- Review of grant management and financials, including:
 - Total grant amount.
 - Quarterly eLOCCS drawdowns indicating the spending to date.
 - Match documentation demonstrating that grant funds, excluding leasing funds, are matched with no less than 25 percent in cash or in-kind contributions from other sources.
- Review of project goals as outlined in the initial application.
- Review of the organization's participation in the CoC and Coordinated Entry System, including:
 - Attendance at General Meetings.
 - Attendance at Coordinated Entry Meetings.
 - Number of referrals received from the Coordinated Entry System and the acceptance/denial status. If denials exist, the recipient should provide a rationale.
 - Attendance of staff members at required trainings, such as HMIS, VI-SPDAT, and documentation trainings.
 - Attendance of staff members at CoC meetings and trainings, such as case conferencing, PIT count, motivational interviewing, etc.

A performance report will be generated, and the results will be shared with the designated project contact during an on-site review.

HMIS Compliance

In order to ensure compliance with the security and data quality standards set by HUD, ARCH staff will conduct monitoring of HMIS compliance for each contributing organization. To facilitate this process, ARCH staff will request the necessary documents for HMIS compliance through email and/or review them during an on-site visit. The requested documents may encompass policies, procedures, certifications, and agreements. It is mandatory for agency staff to submit all the required information by the specified deadline to receive credit for this section. The submitted documents will be reviewed to assess their completeness and accuracy. The following items will be evaluated during the review process:

- **Agreements & Certifications**
 - Participating Agency Agreement
 - Site Creation Form
 - ARCH CoC HMIS End User Security and Privacy Agreements for all HMIS users
- **Data Quality Checks**
 - Staff regularly run quarterly data quality reports and regularly correct errors in timely manner
- **Agency uses the CoC HMIS Standardized Release of Information** applicable to its level of sharing and is consistent in collecting with clients
- **User Authentication, per HMIS policies**
 - All users have signed user license agreements on file and are authorized to use HMIS system
 - Electronic Security Policy addresses username/password sharing, storing usernames/passwords in public locations, and storing passwords in internet browser
 - All HMIS users have unique username, password, and agency email address
- **Hard Copy Data**
 - Procedure in place for secure use and storage of hard copy client personal protected information, including all client (current and former) files are locked in a drawer/file cabinet and locked in an office
- **Security Officer (If applicable)**
- **Virus Protection and Firewall**
- **Physical Access**
 - All HMIS workstations and printers are in secure locations and/or staffed at all times; using password protected lock-screens for unique user-logins
 - Data Access Policy
- **Data Disposal Policy/Procedures**
 - Agency shreds all hardcopy Personal Identifying Information before disposal; agency reformats client data to CDs, computer hard-drives, other media before disposal, etc.
- **Software Security**
 - All HMIS workstations have current operating system and internet browser security, including non-HMIS computers networked with HMIS computers
- **Data Collection**
 - Data Collection Protocol

- HUD and CoC Required Data Elements
 - Agency collects all HUD required Universal Data Elements within HUD intake
 - Agency collects all HUD and CoC required Program Specific Data Elements within the HUD intake, mid program, and exit assessments
- **Training Requirements**
 - All users have completed applicable and annual training and have documentation of trainings
 - % staff that attended annual HMIS refresher training
 - **Has/is the program merging or expanding, ending?**
 - **If using comparable database, does it comply with HUD's HMIS requirements?**

HMIS compliance will be conducted once annually for each agency, irrespective of the number of programs it operates. This evaluation typically takes place during the monitoring of one of the agency's CoC funded programs. However, there are a couple of exceptions to this. The quarterly data quality reports and the Site Creation form will be assessed separately for each CoC program.

On-Site Review

As part of the review, an evaluation will be conducted to discuss the results of each section and complete the review process. The review serves as a valuable opportunity for open dialogue, technical assistance, and performance improvement. Project contacts will receive comprehensive information regarding the full on-site review when it is scheduled.

At the conclusion of the review, agencies will be provided with the opportunity to address the following questions:

- How can ARCH enhance its support to your agency?
- Are there any specific trainings you would like to see offered?
- Is there any additional technical assistance required from ARCH?
- Do you have any further feedback or suggestions?

This feedback session aims to foster collaboration and ensure that agencies receive the necessary support and resources from ARCH.

Summary Report

Following the completion of a review, the program contact(s) will receive a summary report. The report will consist of the following sections:

- Performance Summary
- HMIS Summary
- Review Summary
- HUD Compliance Summary

Based on the evaluation results, the report will indicate whether the project has been selected for a Quality Improvement Plan (QIP).

Quality Improvement Plan

A Quality Improvement Plan (QIP) is a plan developed by the grantee to facilitate the enhancement of program performance. QIPs will be provided upon the recipient organization's request, based on project performance, or as determined by ARCH. Areas requiring improvement or that have raised concerns may include grant spending, inconsistent data in HMIS, HUD compliance issues, or significant shortfalls in meeting performance targets. ARCH will communicate with the grantee to inform them of the decision to implement a QIP for the project and discuss the subsequent steps.

Documentation Requirements

Upon receipt of documents from HUD, all CoC grant recipients must provide the following documents to ARCH (if applicable). These documents are essential for system updates in HMIS, programmatic reporting, and evaluation purposes. Failure to submit these documents to ARCH will result in an incomplete program file. The required documents include:

- Annual grant close-out letters
- Final eSNAPS C1.9a technical submission, if applicable
- Annual award letter and grant agreement
- Documentation of grant amendments, including the request and approval, if applicable
- General communications with HUD, if applicable
- HUD audit documentation, if applicable
- Documentation of homeless participation
- Subrecipient agreements/procurement contracts, if applicable

HMIS Data Quality Reports and Data Completeness Report

The Homeless Management Information System (HMIS) plays a crucial role as the primary data collection source within the CoC. The HMIS department is dedicated to maintaining data quality and accuracy. While it may not be possible to collect all data elements for every client due to individual circumstances, each agency should strive to gather as comprehensive information as feasible. Detailed information about data fields and elements can be found in HUD's HMIS Data Quality Standards. If you have any additional questions or concerns, please reach out to the ARCH HMIS staff.

HMIS Participating Agency Agreement

The Participating Agency Agreement outlines the obligations of agencies involved in data collection within the HMIS, along with the responsibilities of ARCH as the administrating agency for the CoC. Each participating agency is required to complete and sign this agreement, which should be executed by an authorized representative of the agency.

Program Onboarding and Updated Project Description

Upon receiving awards, recipients are required to complete an HMIS Program/Site Creation Form. This form must be filled out for each new project and for existing projects experiencing changes such as merges or expansions. The information provided on the form should align with the eSNAPS application submitted to HUD. To ensure the organization's ability to commence data entry on the project start date, the completed form must be submitted to the ARCH office no later than 30 days prior to that date.

The HMIS team will utilize this form to establish efficient sites and generate accurate data reports for each program. For more comprehensive information on HMIS Project Descriptors, please refer to HUD's guide for HMIS users and administrators.

End User Agreement

All organizations are required to ensure that all HMIS users attend both the new user training and the annual HMIS training. Additionally, organizations must provide ARCH with a copy of the signed ARCH CoC HMIS End User Security and Privacy Agreement. This agreement sets forth the expectations and responsibilities for individuals utilizing the HMIS system.

Annual Performance Report (APR)

The Annual Performance Report (APR) serves as a tool for HUD to monitor the progress and achievements of the projects they financially support. The APR also plays a vital role in the creation of annual project performance scorecards utilized during the CoC funding competition and for assessing CoC-wide accomplishments.

It is mandatory for all recipients of CoC Program funding to submit their APR in the Sage HMIS Reporting Repository within 90 days from the operating year end date.

1. CoC recipients are responsible for reaching out to ARCH staff regarding any data correction issues, allowing for timely technical assistance. Requests for assistance should be made at least 30 days prior to the HUD due date.
2. By the first week of the month of the HUD submission deadline, ARCH staff will conduct a final data review to ensure that all necessary corrections have been made for a successful upload of the Sage CSV file.
3. CoC recipients are responsible for entering ALL relevant information into Sage, including basic grant details, bed and unit inventory/utilization, financial information, and the CSV file containing data from HMIS.

HUD has provided the CoC APR Guidebook, which outlines the steps for APR submission through the Sage HMIS Reporting Repository. If additional Sage training is required, ARCH staff can be contacted. In case the person responsible for submitting the final APR lacks a Sage account or requires assistance in generating the APR data, they can reach out to ARCH for support.