

Stark Housing Network, Inc.

Homeless Continuum of Care of Stark County (HCCSC) Collaborative Applicant

Monitoring Review



Stark Housing Network

Continuum of Care (CoC) Funded Projects

Stark Housing Network, Inc. (SHNI) as the collaborative applicant will monitor and evaluate the performance of CoC funded projects for compliance with HUD and the Homeless Continuum of Care of Stark County (HCCSC) requirements

References:

CoC: Continuum of Care Program - HUD Exchange

24CFR 578

HCCSC Policy C.4 Procedures for Evaluating CoC Funded Projects

Emergency Solutions Grant (ESG) Funded Projects

City of Canton is a direct recipient of funds awarded through the HUD Emergency Solutions Grant program. In keeping with the HEARTH Act requirements, the City works with the HCCSC's collaborative applicant to monitor the performance of ESG subrecipients.

Stark Housing Network, Inc. (SHNI) as the collaborative applicant will monitor and evaluate the performance of ESG subrecipients for compliance with HUD and the Homeless Continuum of Care of Stark County (HCCSC) requirements

References:

[C.11. Procedures for Evaluating City of Canton ESG-Funded Projects](#)

[ESG Program - HUD Exchange](#)

[24CFR 576](#)

Homeless Crisis Response Program (HCRP) Regional – Rapid Rehousing Funded Projects

Stark Housing Network, Inc. (SHNI) as the collaborative applicant will monitor and evaluate the performance of HCRP subrecipients for compliance with HUD ESG requirements

References:

[Rapid Re-Housing: ESG vs CoC \(hudexchange.info\)](http://hudexchange.info)

[ESG Program - HUD Exchange](#)

Overview of Monitoring

Why?

Monitoring is intended to review performance and ensure compliance with the CoC Program, ESG Program and related federal requirements.

Monitoring occurs at multiple levels

- Recipients and Subrecipients self-monitor their projects
- Recipients monitor subrecipients
- The CoC monitors recipients and subrecipients
- HUD monitors recipients

Overview of Monitoring

Who?

- SHNI will reach out to agency leadership to schedule site visits for all projects

What?

- A review of the Project Application, Quarterly Status Reports, APRs, Participant Files/HMIS, Agency Policies and Procedures, Financial Records

When?

- Agency will receive a 30-day notice prior to the site visit
- Site visits will be conducted within 6 – 9 months of the projects start date
- Additional site visits may be requested

Where?

- Typically held in person on-site at the agency
- In some instances, a virtual site visit may be scheduled

Outline of Monitoring

1. Participant Files

Participant File Review

10% or a minimum of 3 files will be reviewed

Participant list with identifier (PID) will be pulled from HMIS for a random selection of files

Participants files will be reviewed based on the required documents for the project

Outline of Monitoring

2. Annual Performance Report (APR), Quarterly Status Report (QSR), CAPER, Spending Reports

APR or CAPER will be reviewed for performance outcomes, on-time submission and errors

QSR will be reviewed for successes and program challenges

QSR & CoC Funding Reports will be reviewed for utilization of funds

Outline of Monitoring

3. Application Review

General Program
Information

Budget and Match

Number of Participants to
be served

Outline of Monitoring

4. Agency Review

Policy and Procedures Manuals
and Documents

Match Documentation
Financial Statement of Activities

Financial Audit
Fidelity Bond

Preparing

What will be requested prior to the site-visit?

5 business days prior to the site visit

- Grant Documents
 - Grant Agreements
 - Budget Revisions
 - HUD waivers
 - All amendments since original application
- Match Documentation
 - Cash Match
 - Letter of Commitment
 - Financial records
 - In-Kind Property or Goods
 - Letter of Commitment
 - Date, description and Value of Donation
 - In-Kind Services
 - MOU
 - Quantity and value of services including dates of service
- Fidelity Bond to cover grant period
- Independent Auditors Report (most recent)

Preparing

What will be
required on-site?

- All Participant files for the projects being reviewed (excludes projects for Emergency Shelter operations and HMIS only)
- Financial Documents for the projects being reviewed
- Agency Policies and Procedures Manuals
- Independent Auditors Report (most recent)
- Agency staff with project knowledge and recording keeping requirements

Preparing

ESG Program - HUD
Exchange

24CFR 576

CoC: Continuum of Care
Program - HUD Exchange

24CFR 578

The next 3 slides are examples of what the monitor will be looking for when reviewing a project.

SHNI Monitoring Checklist

Please refer to the program requirements on the HUD exchange, CFR and local HCCSC policies for additional information

Participant Level Recordkeeping and files

References:

F.10 Recipient and Sub-Recipient Record-keeping Requirements

F.12 Recipient and Sub-Recipient Emergency Solution Grant Record-keeping Requirements

ESG Requirements - HUD Exchange

24CFR 576

CoC: Continuum of Care Program - HUD Exchange

24CFR 578

- Participant Eligibility
 - Documentation of participants homelessness, at risk or imminent risk and disability (if applicable) is obtained at Intake
- Use of Homeless Management Information System (HMIS) System
 - Ensure participants are entered in HMIS or comparable database (DV)
 - Ensure HMIS release is signed and dated
- Use of Coordinated Entry System
 - Ensure participants are assessed and referred using the HCCSC Coordinated Entry System
- Income
 - Ensure participant income documentation is examined at Intake and at least annually or in accordance with program requirements

Participant Level Recordkeeping and files (contd.)

References:

F.10 Recipient and Sub-Recipient Record-keeping Requirements

F.12 Recipient and Sub-Recipient Emergency Solution Grant Record-keeping Requirements

ESG Requirements - HUD Exchange

24CFR 576

CoC: Continuum of Care Program - HUD Exchange

24CFR 578

- Leasing and Rental Assistance Requirements
 - Ensure that rents charged with leasing or rental assistance funds meet Fair Market Rent (FMR) and/or Rent Reasonableness standards
 - Leases are 12 months (or applicable time frame) and signed by both parties
- Housing Quality Standards
 - Ensure units meet HQS at lease-up and are re-inspected annually thereafter or if applicable, a HUD waiver is in file
- Record of Payments
 - Documented payment records
- Case Management and Supportive Services
 - Documented case management notes , supportive services notes including attempts to provide services

General Recordkeeping and Financial Files

References:

HCCSC Policies Standards for Providers F.1-F.12

F.10 Recipient and Sub-Recipient Record-keeping Requirements

F.12 Recipient and Sub-Recipient Emergency Solution Grant Record-keeping Requirements

ESG Program - HUD Exchange
24CFR 576

CoC: Continuum of Care Program - HUD Exchange
24CFR 578

Match Requirements CoC

☐ Standard Operating Procedures

- Ensure there are written policies and procedures for:
 - Participant Intake
 - Housing First
 - Conflict of Interest
 - Financial Management
 - Client Confidentiality
 - Equal Opportunity (Fair Housing, Non-discrimination)
 - Ineligibility determination and termination of assistance
 - Grievance Procedure
 - VAWA and emergency transfers for victims of domestic violence
 - Educational Coordination for projects serving families

☐ Financial

- Record of draw downs
- Financial Statement of Activities
- Match Documentation
- Recent Financial Audit
- Fidelity Bond to cover grant period

☐ Lived Experience Participation

- Ensure homeless or formerly homeless persons have the opportunity to participate in policy making decisions

HUD's Review



Projects should self review and be aware of the exhibits used by HUD for monitoring:

[CPD Monitoring Handbook \(6509.2\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

Emergency Solutions Grants Program-Chapter 28

Continuum of Care Program Chapter 29

ESG

Guides for Review Chapter 28

- ❖ Overall and Subrecipient Management
 - Exhibit 28-2
 - Exhibit 28-3
- ❖ Lead Based Paint
 - Exhibit 24-3, 24-4
- ❖ Participant Eligibility and Record Keeping Requirements
 - Exhibit 28-1
- ❖ Financial Management
 - Exhibit 34-1A
 - Exhibit 28-7
 - Exhibit 28-8
- ❖ Component Review
 - Exhibit 28-6 (RRH and HP)
 - Exhibit 28-4 (Street Outreach)
 - Exhibit 28-5 (Emergency Shelter)

CoC

Guides for Review Chapter 29

- ❖ Overall and Subrecipient Management
 - Exhibit 29-3
 - Exhibit 29-4
- ❖ Lead Based Paint
 - Exhibit 24-3, 24-4
- ❖ Participant Eligibility and Record Keeping Requirements
 - Exhibit 29-1
- ❖ Financial Management
 - Exhibit 34-1A
 - Exhibit 29-11
 - Exhibit 29-12
- ❖ Component Review
 - Exhibit 29-5 (RRH)
 - Exhibit 29-7 (PSH)
 - Exhibit 29-10 (HMIS)

Resources

[HUD Exchange](#)

[CPD Monitoring Handbook \(6509.2\)](#)

[Homeless Continuum of Care of Stark County
SHNI Monitoring Checklist](#)

Questions? Contact:

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Thank you!