Stark Housing Network, Inc.

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

Monitoring Workshop 2024

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:
ESG Program - HUD Exchange
24CFR 576
C.11. Procedures for Evaluating City of Canton ESG-Funded Projects

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)](hudexchange.info)

[ESG Program - HUD Exchange](hudexchange.info)
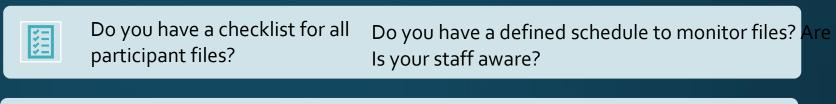
Overview of Monitoring

Why?

Monitoring is intended to review performance and ensure compliance with the CoC Program, ESG Program and related federal requirements
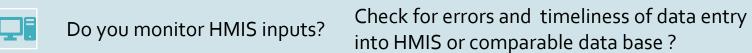
Monitoring occurs at multiple levels
  - ➢ Recipients and Subrecipients **self-monitor** their projects
  - ➢ Recipients monitor subrecipients
  - ➢ SHNI (Collaborative Applicant) monitors recipients and subrecipients
  - ➢ HUD monitors recipients
  - ➢ Ohio Department of Development (ODOD) monitors recipients

SELF-MONITORING

Do you have a checklist for all participant files?

Do you have a defined schedule to monitor files? Are Is your staff aware?

Do you monitor HMIS inputs?

Check for errors and timeliness of data entry into HMIS or comparable data base ?

Do you complete and submit the Quarterly Status Report ?

Do you look at programmatic capacity along side financial capacity?

Do you reference HUD tools to ensure program compliance?

Do you reference HCCSC local policies to help answer questions and ensure compliance ?

Are you assessing and ensuring your projects are using the Housing First approach?

Site Visits conducted by Stark Housing Network, Inc

❖**30- day notice**

6-9 months after the project start date

Additional site visits may be requested

Summary provided after the site visit

➢ Agency response required within 30 days
➢ Summary responses used at future site visits

Typically held in person at the agency

In some instances, a virtual site visit may be scheduled

What to Expect

Project Discussion

Participant Level File Review

Financial Review

Project Discussion

Staff Interview

Successes and Challenges with the project

Any additional information that the staff would like to share

Review and discussion of the agency responses to the previous site visit summary and quarterly status reports

Review of Policy and Procedures Manual

Specifically for the funded program

Participant File Review

Participant File Review

10% or a minimum of 3 files will be reviewed

Participant list will be pulled from HMIS for a selection of files

(a participant list by project should also be pulled by the agency and available during the site visit)

Participant files will be reviewed based on the required documents for the project using the agency files and HMIS

Financial

Accounting Ledger
List of **Specific Expenses** that total the amount reported on the most recent quarterly status report
(budget line items and total)

Match Documentation

Cash Disbursement Test
(participant level record of payments)
This will be requested during the site visit based on the file selection

Most recent financial audit

Fidelity bond to cover the term of the grant

Preparing

What will be requested prior to the site-visit?

5 business days prior to the site visit

- Grant Documents
  - Grant Agreements
    - ❖ Include all amendments requested & approved by HUD
- Match Documentation
  - Letter of Commitment
  - Memorandum of Understanding (MOU)
- Most Recent Financial Audit
- Fidelity Bond
- Housing First Assessment

Preparing

What will be required on-site?

- Agency staff with project knowledge and recording keeping requirements
- List of participants for the operating period being monitored
- All participant files for the projects being reviewed (excludes projects for Emergency Shelter operations and HMIS only)
- Financial documents for the projects being reviewed
  - ❖ Match reports
  - ❖ Participant level payments (as requested)
- Policies and Procedures Manuals

Agency Policies and Procedures (program/project specific)

Financial Management	**Participant Intake**	**Confidentiality**	**Housing First**
Conflict of Interest	**Equal Access** (Fair Housing, Non-Discrimination)	**Determination of Ineligibility**	**Termination of Assistance**
Grievance Procedure	**Emergency Transfer Plan for victims of domestic violence**	**Educational Coordination** (projects that serve families with children)	**Persons with lived experience participation** (board, policy making decisions)

Participant File & HMIS Checklist

- HMIS Release

- Participant Identification Documents

- Verification of Homelessness

- Verification of Disability (PSH)

- Participant Receipt of Information (grievance procedure, program agreement, lead-based paint hazards pamphlet)

- Rental Assistance Agreement

- Lease (12 months and renewable for a minimum of 1 month)

- Rent Reasonableness, Fair Market Rent

- Monthly Case Management Notes (RRH)

- Assistance provided to obtain mainstream benefits

- Housing Quality Inspection

  - Environmental Protection Agency (EPA) approved lead-based paint hazards pamphlet

  - Lead-based paint visual assessment by inspection by certified inspector (household with child under 6 or pregnant person & housing built before 1978)

- Plan for retaining permanent housing after assistance ends

- Assistance provided in accordance with program rules (utilities, security deposit, rental assistance)

- Annual Recertification

Rent Reasonableness and Fair Market Rent (FMR)

CoC Projects

You cannot pay more than what is reasonable, even if the Fair Market Rent (FMR) is higher. If the reasonable rent is higher than the FMR and you are using CoC rental assistance funds, you can pay more than the FMR, up to the reasonable rent. If you are using CoC leasing funds, you cannot exceed the FMR even if the reasonable rent is higher
24 CFR 578.49
24 CFR 578.51

ESG Projects (HCRP Regional RRH)

Rent must meet rent reasonableness standards and cannot exceed HUD's published FMRs for the area

Bottom line: The rent for the unit assisted with ESG funds must not exceed the lesser of the FMR or the rent reasonableness standard. 24 CFR 576.106

Financial

OVERALL MATCH REQUIREMENTS

Recipients and subrecipients are responsible for:

- ❑ Meeting the percentage (25% for CoC and 100% for ESG) requirement over the grant term ;
- ❑ Securing match contributions for the project;
- ❑ Documenting match sources;
- ❑ Tracking match expenditures; and
- ❑ Developing procedures and reporting formats to collect and compile match information

24 CFR 578.73

24 CFR 576.201

SELF-MONITORING OF MATCH
If at the end of a grant term, the match requirement is not met, the recipient may be asked to repay funds. Recipients/subrecipients should monitor match activity during the grant term. They are required to obtain information annually from third parties of in-kind service match activity, and encouraged to gather it quarterly

Match Documentation

Financial

CASH DOCUMENTATION

Substantiated in a commitment letter on agency letterhead, signed and dated by an authorized representative, that includes the following: amount committed; date funds will be available to the project; grant and fiscal year to which it's being contributed; and allowable activities it will support. Cash match must be tracked through the recipient's or subrecipient's financial statements, general ledgers, and other records to show it had been spent on eligible program expenses within the grant term.

Match Documentation

Financial

IN-KIND DOCUMENTATION

In-Kind Property, Equipment or Goods
Substantiated in a commitment letter on agency letterhead, signed and dated by an authorized representative, that includes the following: description and value of donation; date it will be available to the project; grant and fiscal year to which it's being contributed; and method used to value the donation. Match must be tracked by the recipient or subrecipient to demonstrate that these items were delivered to the project and, if applicable, to its participants, during the grant term. • Land, buildings and equipment: If used as match, must determine if counting the full value during the fiscal year it is utilized (as a lump sum) or over multiple grant terms as a prorated amount of the original value.

In-Kind Services
Substantiated by a Memorandum of Understanding (MOU) in place by the time of grant execution. The recipient or subrecipient must track the services to show they were delivered to the participants during the grant term. MOU must include: unconditional commitment to provide the services, detail of the services, profession of person to provide the services, hourly cost, grant and fiscal year it's being contributed, details of the system/calculation method to document the quantity and value of services provided during the grant term.
During the grant term: Must document quantity and value of services and actual date(s) on which provided

RESOURCES

Homeless Continuum of Care of Stark County (HCCSC)

(starkcountyhomeless.org)

Click on Providers Tab

❖ **Monitoring Toolkit**

❖ **Charters & Policies**

❖ **Trainings**

HOUSING FIRST

Use the HUD tool to assess and ensure projects are using a Housing First approach

Housing First Implementation Resources - HUD Exchange
Housing First Assessment Tool - HUD Exchange

HUD tool is user friendly and should require less than 10 minutes to complete

**Complete and submit to the Stark Housing Network, Inc.
5 days prior to site visit**

Quarterly Status Report (QSR)

- CoC funded project requirement
- HCRP Regional (RRH) requirement
- New form if approved will be available March 1st.
  - Revisions have been recommended by the Recipient Approval and Evaluation Committee
  - Pending approval of the HCCSC board.

Refer to the HCCSC Website-Providers Tab for the approved QSR Form (Policy C.5) and Reporting Schedule. Both are available in the monitoring toolkit. https://starkcountyhomeless.org/providers/

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

**Homeless Continuum of
Care of Stark County
(HCCSC)**

(starkcountyhomeless.org)

Questions? Contact:
Lisa Warden
Program Administrator
Stark Housing Network, Inc
lwarden@starkhousingnetwork.org

HUD Exchange

CoC Program Interim Rule

ESG Program Interim Rule

Community Planning and Development
(CPD) Monitoring Handbook

Disclaimer: The information presented is a reference tool for monitoring purposes and may not is not inclusive of all program requirements.
Refer to HUD 24 CFR Part 578, 24 CFR Part 576 and the Homeless Continuum of Care of Stark County (HCCSC) website for complete regulations and policies.

Thank you!