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Procedures for Monitoring and Evaluating CoC-Funded Projects

I. Evaluation - In General

- A. Responsibility for Evaluation. The Collaborative Applicant, with the help and guidance of the Recipient Approval and Evaluation Committee, will monitor and evaluate the performance of CoC-funded projects and their compliance with funding requirements.
- B. Evaluation Methods. The Collaborative Applicant will use the following methods to monitor the performance and compliance of projects:
 - 1. Bi-annual Status Reports;
 - 2. Bi-annual; Annual Performance Report (APR);
 - 3. Final APRs;
 - 4. Audits, monitoring reports of HUD or any other source and any other responses to those audits and report; and
 - 5. Annual site visits.

II. Status Reporting

- A. APRs. To ensure that recipients are meeting relevant performance targets, Homeless Management Information System (HMIS) Participating Agencies will submit Bi-annual APRs on each CoC-funded project as follows:
 - 1. With the exception of the final APR covering the entire grant period which must be submitted as prescribed in Section III below, APR data will be compiled by the HMIS Participating Agencies and submitted to the Collaborative Applicant by the 15th of the month following the end of each 6-month period during the grant.
 - 2. HMIS Participating Agency APRs will be cumulative, covering all months of the grant period that have concluded before the report's due date.
- B. Status Report Forms. In collaboration with recipients, the Collaborative Applicant will develop for the approval of the Recipient Approval and Evaluation Committee and the HCCSC Board, a status report form which will be used to solicit information needed to ensure that recipients are operating efficiently and otherwise satisfying program requirements.
- C. Status Reports. Using the approved form, recipients will be required to submit status reports for each CoC-funded project as follows:

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1. Status reports will be due to the Collaborative Applicant by the 15th of the month following the end of the 6-month period of the grant
 - a. Recipients must download and use the approved status report from the HCCSC website under policies and procedures (C.5) for each submission.
2. Each report will include a financial status update that is cumulative, covering all months of the grant period that ended before the report's due date.

D. Status Report Schedule. A reporting schedule will be sent via email to the designated agency contact and will also be posted on the HCCSC website during the first quarter of each calendar year. This schedule will outline the due date for status reports, aligned with the grant operating period.

III. Annual Performance Reports to HUD (APRs)

A. Submission of APR Draft. Within 60 days after the end of a project's grant period, the recipient must submit a draft of its HUD-required APR for the project to the Collaborative Applicant. Within 10 days after receiving the APR, the Collaborative Applicant will:

1. Review the report to ensure that it is complete and free from errors and omissions that would reflect poorly on the HCCSC or contribute to an inaccurate picture of its performance as a system; and
2. Send an email to the recipient outlining any questions or concerns raised by the report.

IV. Audits and Monitoring Reports. Along with each required status report and APR, recipients must submit to the Collaborative Applicant a copy of any financial audits and program audits or monitoring reports they have received from HUD or any other source since their last submission and any responses they have prepared to those audits or reports.

V. Annual Site Visits

A. Timing and Scheduling of Site Visits

1. The Collaborative Applicant will conduct an annual site visit with each recipient. In cases where a recipient operates more than one CoC-funded project, the Collaborative Applicant may schedule two or more site visits as necessary to effectively monitor all of the projects.
2. Normally, a site visit will occur approximately 6 to 9 months after the beginning of the recipient's grant year. However, it may occur sooner if status reports indicate a need for earlier intervention. In cases where a recipient operates two or more CoC-funded

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projects with different grant years and the Collaborative Applicant chooses to conduct a single site visit to monitor these projects, the Collaborative Applicant will determine the timing of the visit based on all relevant factors, including the prior performance of each project that will be monitored and the HCCSC's need for timely information about each.

3. The Collaborative Applicant will contact a recipient to schedule a site visit 30 days before a visit is due and provide list of items required to be sent to the Collaborative Applicant prior to the site visit and a list of items required to be on site during the visit.
4. The Collaborative Applicant will announce a virtual, in-person or recorded session annually to provide an overview of monitoring and reporting requirements for all CoC funded projects.

B. Purpose of the Visit

During the site visit, the Collaborative Applicant will check the items identified on the monitoring form/checklist to ensure that the recipient is meeting all HCCSC requirements as well as HUD's recordkeeping requirements and all other federal regulations pertaining to CoC funding.

C. Notice of Deficiencies

Following the site visit, the Collaborative Applicant will email the recipient a letter and monitoring summary reflecting notes taken during the site visit, citing any deficiencies and requesting

1. An explanation for each cited deficiency; and
2. A plan for correcting each deficiency.

VI. Role of the Recipient Approval and Evaluation Committee

- A. Regular Meetings to Assess Project Performance. The Recipient Approval and Evaluation Committee will receive feedback from the Collaborative Applicant on status reports, APRs, audits and monitoring reports, and the results of site visits to determine whether projects are meeting performance goals and other expectations.
- B. Notice to Poor Performers. In the event that a project (1) is not meeting performance goals; (2) did not provide a sufficient explanation for deficiencies identified during a site visit; or (3) did not follow the plan approved by the Collaborative Applicant for correcting such a deficiency, the committee will evaluate concerns about the project's performance and, at its discretion, instruct the Collaborative Applicant to send a letter to the funded recipient requesting other or additional correction measures.
- C. Assistance to Poor Performers. The HCCSC, through the Collaborative Applicant and will provide reasonable assistance to underperforming recipients by, among other things:
 1. Directing them to other providers that are achieving better results;

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2. Directing them to research, webinars, websites, and other resources that could provide useful information and instruction; and
3. In cases where poor performance in a particular area is common among HCCSC providers, sponsoring or helping to arrange relevant training sessions for them.

D. Action in the Case of Persistent Poor Performance. If, after a recipient has received notices of poor performance over two grant years and, in the judgment of the Recipient Approval and Evaluation Committee, has made insufficient progress in correcting its deficiencies, the committee may, depending on the severity of the deficiencies:

1. Notify HUD of the facts supporting the concerns about the recipient's poor performance; and
2. Request HUD's assistance in working with the recipient to determine whether (a) performance issues can be resolved; (b) the project or projects in question should be transferred to another agency; or (c) funds should be reallocated in accordance with most current HUD guidelines