

# Stark Housing Network, Inc.

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

Monitoring Workshop  
2026



**Stark Housing Network**

# Monitoring Policy

Stark Housing Network, Inc. (SHNI) as 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, City of Canton ESG-funded projects, HCRP Regional Rapid Rehousing funded projects for compliance with funding requirements.

# Purpose of Monitoring



ENSURE HUD AND LOCAL  
COC COMPLIANCE

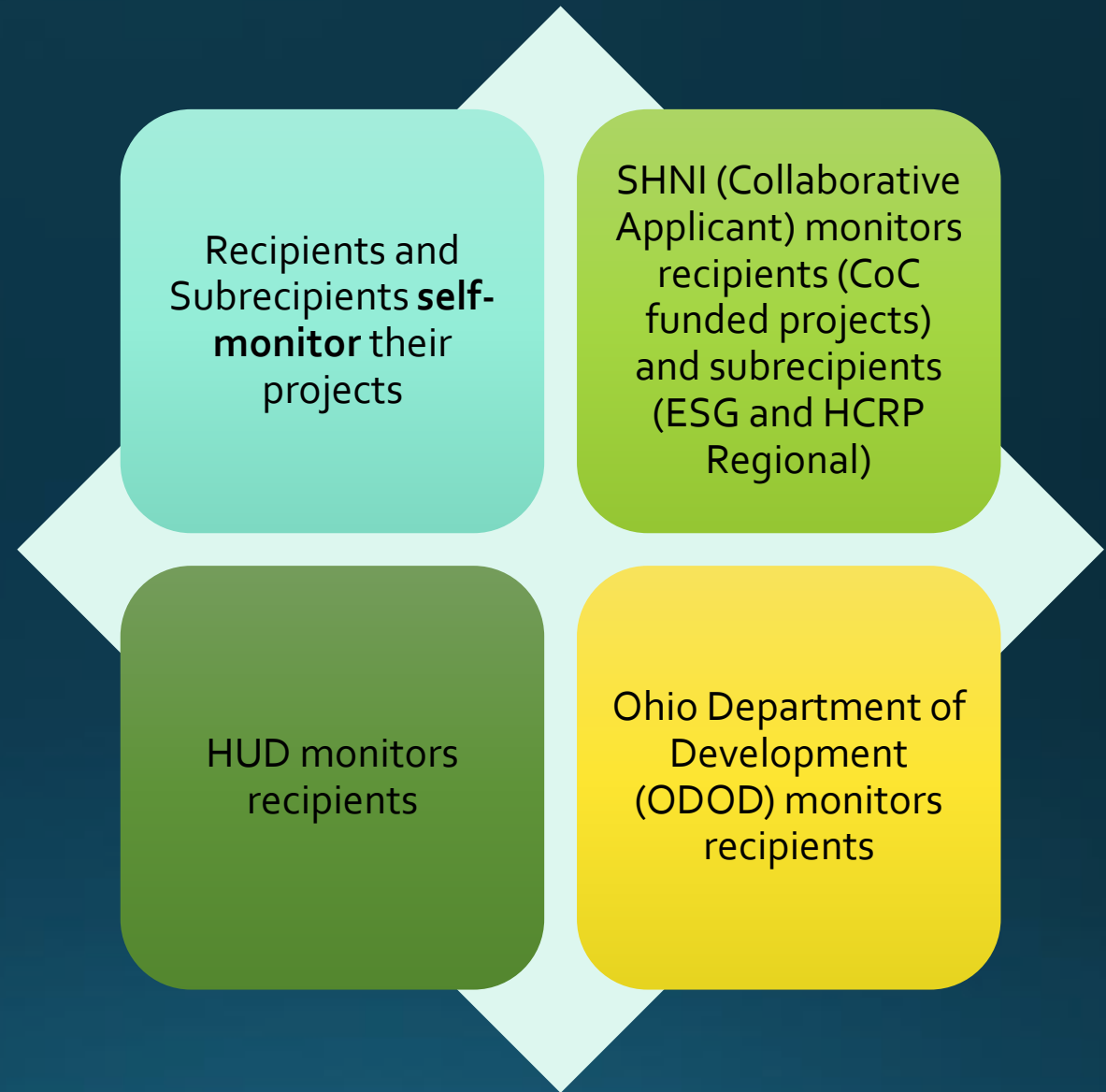


VERIFY PROGRAM  
PERFORMANCE AND  
DOCUMENTATION



SUPPORT CONTINUOUS  
IMPROVEMENT  
IDENTIFY TECHNICAL  
ASSISTANCE NEEDS

# Monitoring occurs at multiple levels



# CoC & HCRP Regional Monitoring Methods

Bi-annual Status  
Reports

Bi-annual and final  
Annual Performance  
Report (APR)\*

Audits, monitoring reports of HUD or any other  
source and responses to those audits and report

**Annual Monitoring Review**  
**6-9 months after the project start date**

Additional monitoring reviews may be requested

\*HCRP Regional funding follows ESG guidelines, which typically requires a CAPER report however, per guidance from ODOD the Annual Performance Report (APR) is to be used.

# ESG Monitoring Methods

**Monthly expenditure and progress report**

**Monthly Consolidated Annual Performance and Evaluation Report (CAPER)**

**Audits, monitoring reports of HUD or any other source and responses to those audits and report**

**Annual Monitoring Review**  
**Within 10 months after the beginning of the subrecipient's grant award/project start date**

*Additional monitoring reviews may be requested*

# What to Expect



Review of Agency-Level Procedures  
(specific to funded program)



Participant Level File Review  
(agency files and HMIS)



Financial Review



Review of Project Performance Outcomes  
(HUD Performance Benchmarks-Sage HMIS Reporting Repository)

# Self-Monitoring & Compliance Review

- File organized and complete
- Required signatures and dates present
- Documentation consistent across file and HMIS
- Confidential information securely maintained
- File review/Quality Assurance completed by supervisor or other



# Self-Monitoring & Compliance Review

- Quarterly Draws (CoC)
- Monthly Expenditure Request (ESG)
- Report review/ Quality Assurance completed by supervisor or other
- On-time Status Reports
- On-time APR/CAPER Reports



# SELF-MONITORING



Do you have a checklist for all participant files?

Do you have a defined schedule to monitor files? Are



Do you monitor HMIS inputs?

Do you check for errors and timeliness of data entry into HMIS or comparable data base ?



Do you complete and submit the Required 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 ?



Do you schedule 1:1 meetings with Stark Housing Network if you need assistance identifying resources or questions related to monitoring?

# CoC Policies vs. Agency-Level Procedures

## CoC Policies

Formal rules, standards, and requirements that apply across the entire Continuum of Care (CoC) system and all participating agencies/projects

System-wide rules

Establish expectations and standards

Approved by CoC board

Apply to all participating providers

Define **what must happen**

## Agency-Level Procedures

Internal step-by-step processes an individual organization uses to implement and comply with funding requirements

Organization-specific workflows

Describe operational steps

Approved internally by agency leadership

Apply only within that agency

Define **how staff complete the work**

# Agency Policies and Procedures (program/project specific)

**Financial Management**

**Participant Intake**

**Confidentiality**

**Conflict of Interest**

**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 Review

HMIS Release	Participant Identification Documents	Plan for retaining permanent housing after assistance ends	Housing Quality Standards Inspection (HQS)/INSPIRE	Homeless status documentation
Crisis/safety planning (if applicable)	Chronic homelessness documentation (if applicable)	Lead-based paint visual assessment by inspection by certified inspector (household with child under 6 or pregnant person & housing built before 1978)	Verification of Disability (PSH)	Participant Receipt of Information (grievance procedure, confidentiality, 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	Documented referrals to mainstream resources
Employment/income support documentation	Annual Assessment (if applicable)	Financial assistance provided in accordance with program rules (utilities, security deposit, rental assistance)	Program eligibility determination completed	Signed participant agreement/occupancy agreement

# Financial

## **Accounting Ledger**

List of **Specific Expenses** that accurately reflect the amount of draw requests

## **Match Documentation**

## **Cash Disbursement Test**

(participant level record of payments)

This will be requested based on the file selection

## OVERALL MATCH REQUIREMENTS

# Financial

[CoC Match - Match Requirements - HUD Exchange](#)

Recipients and subrecipients are responsible for:

- Meeting the percentage (25% for CoC and 100% for ESG) requirement over the grant term ;
  - ❖ HCRP Regional RRH does not require match
- Securing match contributions for the project;
- Documenting match sources;
- Tracking match activities; and
- Developing procedures and reporting formats to collect and compile match information

### 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

# Common HUD Compliance Risk Areas

- ⚠ Missing homelessness documentation
  - ⚠ Missing disability verification
  - ⚠ Missing/Incomplete case notes
  - ⚠ Missing HQS inspections
- ⚠ Income calculations unsupported
  - ⚠ Late HMIS data entry
- ⚠ Missing participant signatures/dates
- ⚠ Inconsistent documentation between file and HMIS

# Common HUD Compliance Risk Areas

- ⚠️ Unsupported financial assistance payments
- ⚠️ Financial assistance outside eligible program dates
- ⚠️ Delayed drawdowns or reimbursement requests
- ⚠️ Unsupported match or leverage documentation
- ⚠️ Failure to maintain adequate audit trail for expenditures
  - ⚠️ Ineligible costs charged to grant

# HUD Sage HMIS Reporting

## Quality Assurance Review

- Multiple staff members have access to and working knowledge of Sage reporting requirements, including designated program and finance staff to support reporting accuracy, continuity, and compliance.
- Internal supervisor review completed
- Report totals compared to prior reporting periods
- Significant variances explained/documentated
- Required supporting documentation retained
- Copy of final submission saved internally
- Confirmation of successful submission saved
- Staff notes/documentation retained for audit purposes

# HUD Sage HMIS Reporting

## Recommended Best Practice Workflow

1. Run internal HMIS data quality reports
2. Correct errors and missing data
3. Generate draft APR/CAPER report
4. Conduct supervisor or peer Quality Assurance review
5. Correct all errors before submission
6. Export final CSV/XML files
7. Upload to Sage HMIS Reporting Repository
8. Resolve validation issues
9. Provide Explanation for underperformance/variances
10. Submit final report
11. Save confirmation and backup documentation
12. Check back to ensure the report is accepted

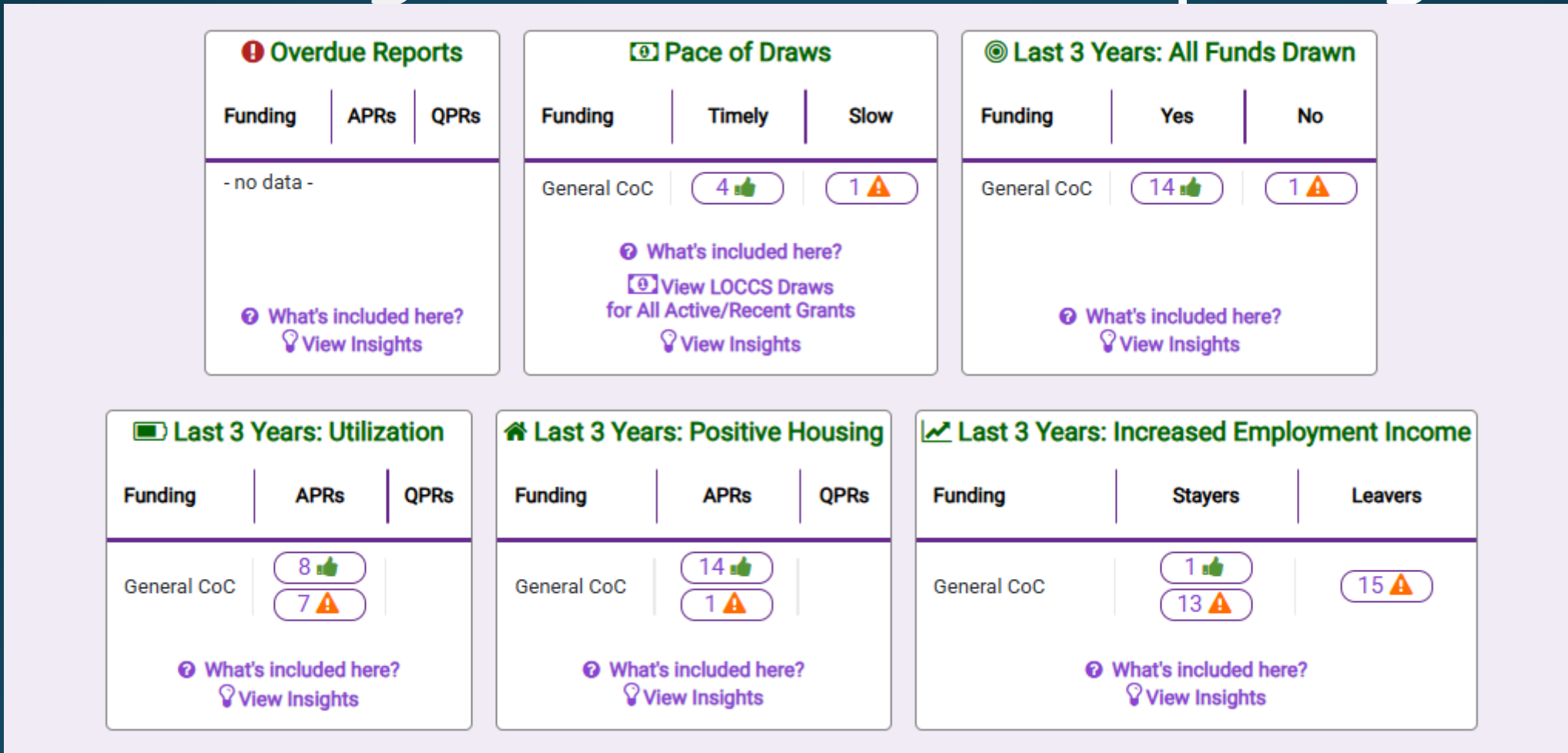
## HUD Sage HMIS Reporting

# Common Submission Risk Areas

- ⚠️ Incorrect reporting dates
- ⚠️ Missing or incomplete household data
- ⚠️ Duplicate client records
- ⚠️ Invalid exit destinations
- ⚠️ Missing income or benefits data
- ⚠️ Bed inventory mismatches
- ⚠️ Data entered after report generation

- ⚠️ Uploading wrong project files
- ⚠️ Unresolved Sage validation errors
- ⚠️ APR/CAPER totals inconsistent with agency records
- ⚠️ Incorrect project setup in HMIS
- ⚠️ Missing housing move-in dates
- ⚠️ Failure to save proof of submission

# HUD-Sage Performance Spotlights



[Sage Performance Spotlight Video](#)

Note: log in to Sage to access the video

# Resources



[Welcome to HUD Exchange - HUD Exchange](#)



[Home - Stark Homeless Continuum \(starkcountyhomeless.org\)](#)



[CoC Program Code of Federal Regulations eCFR: 24 CFR Part 578](#)



[ESG- Code of Federal Regulations 24 CFR Part 576](#)



[HCRP standards](#)

<https://development.my.site.com/OCDTA/s/article/HCRP-Standards>

Disclaimer: The information presented is a reference tool for monitoring purposes and may not be 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!