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### Procedures for Evaluating City of Canton Emergency Solutions Grant (ESG) Projects

General Note: The City of Canton is a direct recipient of federal funds awarded through the Emergency Solutions Grant (ESG) program of the U.S. Department of Housing and Urban Development (HUD). In keeping with the HEARTH Act requirements, the City will work with the Homeless Continuum of Care of Stark County's (HCCSC's) Collaborative Applicant and Recipient Approval and Evaluation Committee to evaluate ESG applications from prospective subrecipients and monitor the performance of ESG subrecipients under contract to the City of Canton.

#### I. Evaluation - In General

- A. Responsibility for Evaluation. With the help and guidance of the Recipient Approval and Evaluation Committee, the Collaborative Applicant will monitor and evaluate the performance of Canton's ESG-funded projects and their compliance with funding requirements. In all cases, the Collaborative Applicant is responsible for informing the City of ESG subrecipient performance and sending to the City all necessary correspondence and grant-related documentation exchanged between the Collaborative Applicant and the subrecipient.
- B. Evaluation Methods. The Collaborative Applicant will use the following methods to monitor the performance and compliance of projects:
  - 1. Monthly status reports (currently the City ties these reports to paying monthly invoices);
  - 2. Annual reports;
  - 3. Annual site visits; and
  - 4. HUD reviews and agency responses.

#### II. Status and Annual Performance Reports

- A. Status Report Forms. In collaboration with subrecipients, and in consultation with the HCCSC's Board and Recipient Approval and Evaluation Committee, the Collaborative Applicant will develop a status report form which will be used to solicit information needed to ensure that subrecipients are meeting relevant performance measures and otherwise satisfying program requirements.
- B. Frequency of Status Reports. Using the adopted form, subrecipients will be required to submit status reports monthly for each ESG-funded project pursuant to the following schedule:

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1. The first report will be due on the fifteenth day of the month following the effective date of the Grant Agreement with the City.
2. Likewise, each subsequent report will be due on the fifteenth day of the month following the month covered by the report.

### C. Annual Reports.

1. ESG subrecipients must submit annual reports providing the information needed by the City of Canton to complete the CAPER (Consolidated Annual Performance Report).
2. The City will send to each subrecipient the forms/reports to be completed. Forms/reports will be due to the City no later than April 30 of each year. Forms/reports will be forwarded from the City to the Collaborative Applicant.

### III. Annual Site Visits

#### A. Timing and Scheduling of Site Visits

1. The Collaborative Applicant will conduct an annual site visit with each subrecipient 10 months after the beginning of the subrecipient's grant year or sooner if status reports indicate a need for prior intervention.
2. The Collaborative Applicant will contact a subrecipient to schedule a site visit 30 days before the visit is due and send to the subrecipient a copy of the monitoring form that the Collaborative Applicant will use during the visit, identifying sections of the form that the subrecipient must complete before the visit.

#### B. Purpose of the Visit. During the site visit, the Collaborative Applicant will check the items identified on the monitoring form to ensure that the subrecipient is meeting HUD's recordkeeping requirements and abiding by all other federal regulations pertaining to ESG funding.

#### C. Notice of Deficiencies. Following the site visit, the Collaborative Applicant will give the subrecipient a copy of the monitoring form reflecting any notes taken during the visit. In addition, the subrecipient will receive a letter from the Collaborative Applicant citing any deficiencies noted during the visit and requesting:

1. An explanation for each cited deficiency; and

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2. A plan for correcting each deficiency.

### IV. Role of the Recipient Approval and Evaluation Committee

- A. Regular Meetings to Assess Project Performance. HCCSC's Recipient Approval and Evaluation Committee will meet at least quarterly to review status reports, annual reports, and the results of site visits in order 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 re-evaluate concerns about the project's performance and, at its discretion, instruct the Collaborative Applicant to send a letter to the subrecipient requesting other or additional correction measures.
- C. Assistance to Poor Performers. The Collaborative Applicant and Recipient Approval and Evaluation Committee will provide reasonable assistance to underperforming subrecipients by, among other things:
  1. Directing them to other service providers that are achieving better results;
  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 ESG providers, recommending to the City of Canton that arrangements be made to provide relevant training sessions for the providers.
- D. Action in the Case of Persistent Poor Performance. If, after a subrecipient 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. Recommend to the City of Canton that the subrecipient be deemed ineligible for future funding, or, at a minimum, be subject to appropriate grant restrictions; and
  2. Request HUD's assistance in working with the subrecipient 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.