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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. Quarterly Status Reports;
 - 2. Quarterly 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. Quarterly Status Reporting

- A. Quarterly APRs. HMIS (Homeless Management Information System) Participating Agencies have access to retrieve any individual and aggregate data entered in to the HMIS by their own programs. To ensure that recipients are meeting relevant performance targets, HMIS Participating Agencies will submit quarterly 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 quarter of the grant period.
 - 2. HMIS Participating Agency APRs will be cumulative, covering all quarters of the grant period that have ended before the report's due date.
- B. Quarterly 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. Quarterly Status Reports. Using the approved form, recipients will be required to submit quarterly 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 each quarter of the grant period.
2. Each report will include a financial status update that will be cumulative, covering all quarters of the grant period that have ended before the report's due date.

D. Status Report Reminders. At least 30 days before an organization is scheduled to submit a status report, the Collaborative Applicant will send a reminder by e-mail to the designated agency contact. The e-mail will include the date the report is due along with a copy of the report form and instructions for submitting the form.

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 a letter to the recipient outlining any questions or concerns raised by the report.

B. Submission of Final APR. Within 10 days of submitting the final version of an APR in the Sage HMIS Reporting Repository, a CoC recipient must send an email to Collaborative Applicant stating that the APR has been submitted.

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 months after the beginning of the recipient's grant year. However, it may occur sooner if status reports indicate a need

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for earlier intervention. In cases where a recipient operates two or more CoC-funded 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 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 send to the recipient a copy of the monitoring form that the Collaborative Applicant will be using, identifying sections of the form that the recipient 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 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 give the recipient a copy of the monitoring form reflecting any notes taken during the visit. In addition, the recipient 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
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 meet at least quarterly to receive feedback from the Collaborative Applicant on status reports, APRs, audits and monitoring 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 funded recipient requesting other or additional correction measures.
- C. Assistance to Poor Performers. The HCCSC, through the Collaborative Applicant and Recipient Approval and Evaluation Committee, will provide reasonable assistance to underperforming

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recipients by, among other things:

1. Directing them to other 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 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.