2019 CoC Program Monitoring Process Policy

Introduction:

The goals of Chicago Continuum of Care Program Monitoring are to:

- Proactively assist projects with efforts to comply with Department of Housing and Urban Development (HUD) regulations. Although CoC program monitoring does not exhaustively address all HUD program requirements, this process addresses areas that HUD prioritizes.
- Provide guidance and technical assistance opportunities to CoC-Funded projects.
- Address and help resolve performance concerns related to policies, procedures, and outcomes.
- Ensure there is consistency in how agencies/projects implement their CoC-Funded programs.

A three-tier monitoring process was piloted in 2018 which will be continued in 2019. All Chicago has used lessons learned from 2018, feedback from monitoring recipients, and feedback from the monitoring workgroup to make improvements to the process for 2019.

Selection Process:

All Chicago will use the process outlined below to identify agencies to be selected for CoC program monitoring. These criteria have been established because they enable All Chicago to monitor a variety of programs, including those that exhibit performance concerns, exhibit concerns with adherence to HUD required guidelines, or have not exhibited risk factors but have not been monitored recently.

The following steps will be taken in the order given until the desired number of monitoring slots are filled:

- First, remove any agency that was monitored by HUD in 2018 or will be monitored by HUD in 2019, if this information is known in advance, from the list of potential agencies to monitor. If an agency is unintentionally selected for CoC monitoring and HUD monitoring in the same year, the agency may request to opt out of the CoC monitoring by notifying All Chicago within one week of receiving the selection notice.

- Second, of the 14 agencies that have not received a CoC monitoring visit since the site visit process began in 2015 (unless the first criteria applies), select 3 agencies/projects that had final combined scores in the top 50% in the 2018 Local Evaluation.

- Third, of the 24 agencies that have not received a CoC monitoring visit in 2017 or 2018 (unless the first or second criteria applies), select 6 agencies/projects that demonstrate a higher than average risk for grant noncompliance through the 2019 CoC Competition Intent to Renew. These projects could be selected for receiving a high number of "Pass with Findings" designations, receiving a "Pass with Findings" in a significant area (for example, a significant housing first concern or coordinated entry participation concern), or receiving a corrective action plan due to inability to correct a "Pass with Findings" prior to the start of the Local Evaluation.

- Fourth, select 3 agencies/projects that are 2 standard deviations below the mean in the 2019 Local Evaluation.

In addition to the selection process outlined above, All Chicago will provide an opportunity for agencies to self-identify interest in receiving a monitoring visit. A SurveyGizmo form will be posted to the monitoring page of All Chicago's website that will be used to seek input from agencies on whether they want to be considered for monitoring in 2019. The deadline to self-identify interest is September 1, 2019. All Chicago will determine whether those interested will be selected based upon staff capacity.

Number of Agencies/Projects Selected:

In 2019, there will be a minimum of 12 projects monitored from 12 different agencies. After the 12 have been selected using the established criteria, All Chicago will consider whether staff capacity is available to simultaneously review more than one project at any of the agencies to increase the number and type of projects monitored. For example, if an agency has 3 PSH projects and 1 RRH project and the RRH project is selected, All Chicago may decide to also review one PSH project so feedback may be provided on both model types. Another reason to select more than one project is if the agency has project-based programs and scattered-site programs or rental assistance and leasing programs.

The three components of the monitoring process are the desk audit, on-site client file review, and self-assessment. The desk audit and self-assessment are completed at the agency level. When multiple projects are monitored at an agency, the on-site client file review is the only component that occurs independently for each project.

Timeline:

Monitoring will begin in April and continue through November. All Chicago will divide the monitored agencies into four cohorts. Three agencies will be monitored during each cohort. Each agency within a cohort will have the same due dates and deadlines, but on-site client file reviews will occur on separate dates. The cohorts are divided as follows:

Cohort 1: April to May
Cohort 2: June to July
Cohort 3: August to September

Cohort 4: October to November

Notification and Preparation:

Agencies will be notified a minimum of two weeks prior to the beginning of the cohort. Therefore, cohort 1 will be notified by March 15, cohort 2 will be notified by May 15, cohort 3 will be notified by July 15, and cohort 4 will be notified by September 15.

All Chicago will post the following materials to the monitoring page of All Chicago's website so agencies may prepare in advance of their scheduled timeframe: overview questionnaire PDF form, self-assessment PDF form, desk audit PDF form, on-site client file review PDF form, monitoring process instruction manual, a sample summary report and a sample TA plan.

Methods:

All Chicago will utilize three monitoring components: desk audits, on-site client file reviews, and self-assessments. If more than one project is selected from a single agency, the agency will only be asked to complete the self-assessment and desk audit once, but an on-site client file review will be conducted for each project. A grant overview questionnaire is also utilized with each project.

- ***Grant overview questionnaire:*** Each project will start the monitoring process by completing a grant overview questionnaire containing questions that will provide All Chicago with the context and background needed to successfully complete the three monitoring components. Questions will cover the history of the grant, special populations served, family or individual project, project-based or scattered site, and other funding sources. All Chicago will pre-populate information already available such as grant year, grant amount, and budget lines.

- ***Desk audit***: The desk audit is a tool used to evaluate policies and procedures in place at the agency to ensure compliance with HUD regulations and local priorities. Because there are many acceptable ways to operate a program, for each question the agency/project provides a description of how they comply, followed by uploading supporting documents/evidence or identifying whether supporting evidence may be demonstrated best through an on-site visit or staff interviews. The topics covered in the desk audit include HMIS policies and procedures, staff training and support, supportive services, resource linkages, and program management policies. The desk audit PDF form is available for review and preparation purposes on the monitoring page of All Chicago's website. To submit this component, the agency will receive a link to a SurveyGizmo form which allows for both narrative text and file uploads.

- ***On-site client file review***: The file review evaluates whether appropriate documentation is maintained in participant files for eligibility, housing, and supportive services. A cross reference between the physical files and HMIS database is performed for areas such as consent, enrollment, move-in dates, housing status, and income. The file review lasts one business day and occurs on-site at the project's facility**.** The on-site client file review is completed for between 6 and 10 participants. When selecting participant files, All Chicago will choose a cross-section of files that will include participants who have recently exited, participants who have recently enrolled, and participants who have long periods of program enrollment. If more than one project is selected per agency, the number of files reviewed and days on site may vary. All Chicago will send the agency the selected list of HMIS Client IDs 1-2 days before the review so staff may retrieve the files. At the beginning of the review, All Chicago will ask staff to demonstrate how forms and documentation are organized within the file structure. However, agency staff do not need to remain with the monitors the whole time. All Chicago will highlight preliminary results at the end of the file review. There will also be time designated during this day for a staff member to review additional on-site documents related to the desk audit and/or interview staff, if necessary. The on-site client file review PDF form is available for review and preparation purposes on the monitoring page of All Chicago's website.

- ***Self-assessment****:* The self-assessment is an opportunity for the project to reflect on performance and challenges related to practices that are priorities in our community. It is an opportunity for the agency to self-evaluate their project and discuss areas in which they would like to request technical assistance (TA). Topics covered in the self-assessment include homeless and chronic homeless definitions and recordkeeping, coordinated entry, enrollment, housing, eviction prevention, data collection, staff development, service provision, and grant management. Question types include narratives, checkboxes, Yes/No, and rating scales. The self-assessment also provides an opportunity for the project to identify additional TA needs related to performance on the Intent to Renew or the Local Evaluation. The self-assessment PDF form is available for review and preparation purposes on the monitoring page of All Chicago's website. To submit this component, the agency will receive a link to a SurveyGizmo form once the monitoring window begins.

Timeframe and Process for Selected Agencies:

This is the schedule that will occur over the 9 week/45 business day monitoring window. The last 5 days of one cohort overlaps with the first 5 days of the following cohort. If needed, adjustments may be made to the schedule to ensure All Chicago and the selected agency are able to complete NOFA responsibilities.

Day	Agency
1	Receive overview questionnaire, desk audit tool, self-assessment tool, and requests to schedule on-site client file review date and conference call date
3	Overview questionnaire is due

10	Desk Audit is due
20	Self-assessment is due
21-35	On-site client file reviews occur
36	Receive summary report covering desk audit & file review
37-40	Conference calls occur to discuss the self-assessment, the summary report, and develop a TA plan
41-45	TA activities occur or are scheduled for a future date

Results:

On day 36 the agency will receive a monitoring summary report which will include the results of the desk audit and the on-site client file review components. A conference call with agency and All Chicago staff will be held within 5 days to discuss the results, answer questions about the report, discuss the self-assessment component, and decide what to include in the technical assistance (TA) plan.

Included in the monitoring report is a spreadsheet that lists requested actions which identify areas where corrections or updates need to be made to policies, procedures, or participant files. All Chicago may also address areas in which there are no requested actions but where recommendations may be made to help strengthen policies or procedures. The agency will be asked to update the spreadsheet with corrective actions taken within 6 weeks of the end of the monitoring window. All Chicago will review the updates at that time and advise the agency if a significant area of noncompliance remains. Agencies will not be required to resubmit documentation, but the agency may request further review of updated policies and procedures as part of the TA plan.

Technical Assistance:

Types of technical assistance may include formal or informal discussions, referrals to training, special/tailored training sessions, referrals to written technical assistance articles or resources, feedback on drafted or revised policies, and referrals to other content experts within or outside of Chicago's CoC. The process of completing monitoring components and receiving results from All Chicago is also considered technical assistance due to the potential for agencies to develop additional understanding of requirements and practices by participating.

After the conference call occurs in which the agency and All Chicago staff agree upon areas in which technical assistance is needed and available, All Chicago will write a TA plan and send it to the agency. The following five days will be reserved to provide TA, either to individual agencies or to a group within the cohort. If TA cannot be provided in that timeframe, it will be scheduled for a future date.

Agencies are encouraged to work collaboratively with All Chicago to determine areas in which technical assistance will help drive program improvements. If an agency chooses not to receive technical assistance from All Chicago, this information will be shared with identified groups within the Continuum of Care as outlined in the "Sharing Monitoring Results" section.

Communication Strategy:

Regarding the timely follow-through on monitoring activities, All Chicago aims to work collaboratively, not punitively, with monitored agencies and provide clear communication and expectations throughout all components so that activities can be successfully fulfilled. Additionally, All Chicago has established a protocol to provide 3 reminders to agencies regarding missed deadlines. After three reminders have been issued, All Chicago will make note in the monitoring report of actions and activities that are incomplete, and this information may be shared as outlined in the "Sharing Monitoring Results" section.

Entities and Team Members Involved with the Monitoring Process:

Monitoring will primarily be conducted by a team of 2-4 staff members from All Chicago:

- 1-3 CoC Program Staff: To review self-assessments and desk audits and perform on-site client file reviews.
- 1 HMIS Staff: To evaluate questions regarding HMIS data entry during the on-site client file reviews.

Additionally, as the lead entity for Coordinated Entry in Chicago, Corporation for Supportive Housing (CSH) staff members will also be aware of the agencies/programs that are monitored and, as necessary, contribute to feedback or support related to coordinated entry procedures.

Subrecipients:

If a project that has a sub-recipient is selected for monitoring, All Chicago will work directly with the recipient and the recipient will be responsible for gathering information and responding to All Chicago.

Evaluation:

All Chicago staff will conduct an end-year evaluation of the process by asking agencies to complete a survey, reviewing aggregate monitoring results, and seeking feedback from the monitoring workgroup. Aggregate monitoring results will contain data including, but not limited to, the number of policies/procedures that are revised, the number of new policies/procedures that are created to address identified gaps or improve future compliance, and the number of resources or connections provided to monitoring recipients.

Following the end-year evaluation, All Chicago will identify best practices and make recommendations for any adjustments needed to the next year's process. A year after monitoring is completed, when the agencies have completed another year of the local evaluation, the agencies will be asked to complete an additional follow-up survey with questions that will help determine the impact of the completed monitoring components on score changes or trends.

All Chicago will also track HUD audits that occur after agencies are monitored to determine if the process contributed to prevention of findings or concerns.

Sharing Monitoring Results:

Aggregate monitoring results will be shared with workgroups and the community at large to illustrate system strengths and weaknesses that are identified through the monitoring process. Information will be shared without disclosing the performance of specific agencies/projects.

However, specific groups have the potential to receive monitoring results that disclose the performance of specific agencies/projects. The groups that may receive this type of information are the Project Prioritization Workgroup, System Performance and Evaluation (SPEC) Committee, Collaborative Applicant Committee, Appeals Panel of the Board of Directors, and HUD. The circumstances under which identifiable information will be shared with these groups are: if findings from the monitoring are significant enough that those deciding on matters of funding and/or ranking should be made aware of them, if the monitoring uncovers agency/project misrepresentation of information in the Local Evaluation, or if the agency/project does not participate in all components of the monitoring process, including technical assistance.