2021 CoC Program Monitoring 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 (TA) 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.

Since 2018, All Chicago has used an On-Site Client File Review Tool as a component of program monitoring. This tool has enabled reviewers to evaluate how projects carry out the policies and protocols they have in place. It has been useful in identifying where there are needs for technical assistance in our continuum in order to comply with regulations and best practices. This policy recognizes the usefulness of the On-Site Client File Review Tool and seeks to continue its implementation, thereby enhancing our ability to ensure consistency of practices in the CoC and provide technical assistance.

Selection:

In 2021, All Chicago will monitor two agencies. This is a smaller number of agencies than in past years due to impacts of the COVID-19 pandemic on agency operations at All Chicago and partner agencies. For the agencies that are selected, All Chicago will monitor every HUD CoC-Funded Project within the agency.

All Chicago will compile a list of agencies that fall into any of the following categories: the agency has not been monitored by the Continuum of Care, has a recent low score on the Local Evaluation Instrument, has recently needed high level of technical assistance in the Intent to Renew process, or has other performance concerns. The two agencies will be selected from this list.

Agencies that wish to be monitored may also notify All Chicago by contacting Jennifer Fabbrini, Manager of Monitoring and Technical Assistance, at jfabbrini@allchicago.org. If capacity allows, All Chicago will agree to monitor agencies that volunteer.

Methods:

All Chicago will use a Targeted Client File Review Tool which will consist of 3 topics: homeless & chronic homeless documentation, individual service plans, and exits. The topics are chosen due to the high level of importance in terms of regulatory compliance and strategies for ending homelessness. An additional

topic of review related to HMIS data entry will also be evaluated as capacity allows. A staff interview will also be a component of the monitoring. The purpose of the interview is to learn more about how the agency implements best practices and proven approaches.

All Chicago will continue to use the On-Site Client File Review Tool that was developed in 2018 and 2019, but this tool has been renamed as the Comprehensive Client File Review Tool. This tool will be used to further evaluate and provide TA to projects with whom there is an identified need to offer further support.

For details regarding the process that will be used for Targeted Client File Reviews and Comprehensive Client File Reviews, see sections A (Targeted Client File Review) and B (Comprehensive File Review) located at the end of this policy.

All Chicago uses the annual Intent to Renew process to evaluate and provide technical assistance to agencies regarding their written policies and fulfillment of local standards and thresholds. Additionally, a Self-Assessment Tool is available for voluntary use by agencies to evaluate the current state of their own organization in several key areas such as participation in coordinated entry, verification of chronic homelessness, utilization of data, and services provided. The information can be used by the agency to identify areas of technical assistance to request from All Chicago.

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 at least 2 reminders to agencies regarding missed deadlines (initially by email and also by phone or scheduled check-in). If the issue still remains, 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.

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.

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 Monitoring

Workgroup, Ranking Policies Committee, System Operations and Performance and Evaluation Committee (SOPC), Collaborative Applicant Committee (CAC), 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. To help determine whether monitoring findings are significant, All Chicago monitoring staff will consult with the All Chicago Executive Team and SOPC.

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. 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. Targeted Client File Review Process

Timeframe:

All Chicago will conduct monitoring between September and December. Each agency will receive a review that lasts one or two days, depending on the number of projects.

# of Projects at an Agency	Estimated Length
1 - 3	One Day
4 - 10	One or Two Days

Virtual Process

Monitoring will occur virtually due to the COVID-19 pandemic. All Chicago will grant the agency access to a sharepoint folder where documents will be uploaded for secure sharing. One week prior to the scheduled monitoring date, the agency will receive the list of files that All Chicago has selected. The list will indicate which forms/documents are requested for each participant on the list, and only the requested forms/documents will need to be uploaded by the agency. The documents must be uploaded by 9am on the monitoring date.

On the monitoring date, a 30-minute conference call will be scheduled at 9am to kick off the monitoring process. In case reviewers have questions about file documentation during the review, one agency staff member will need to be available by phone on the monitoring date. The day after the monitoring date, the staff interview will take place, and All Chicago will also schedule an exit conference to share preliminary results.

Notification and Preliminary Information:

The agencies that are selected will be notified in August 2021. All Chicago will schedule the visit with the agency no less than 4 weeks after the date of notification. Once notified, the agency will receive the CoC Program Monitoring Instruction Manual which includes guidance on relevant file sections that have been impacted by HUD waivers during COVID-19, the procedures for uploading documentation, list of forms/documents to upload, and copies of the tools used during the monitoring process. To prepare for monitoring, the agency will be asked to submit a Pre-Monitoring Questionnaire at least three weeks prior to the scheduled monitoring date. The questionnaire contains information needed by All Chicago to prepare for the review, including information about the projects (so reviewers can account for how these details impact program regulations), case load lists of current participants (used for file selection), policies and procedures the agency has updated (so reviewers have most recent versions of procedures when reviewing the files), and a staff list (to aid in selection of a staff member to interview).

Number and Selection of Files:

The number of files that will be reviewed for each project will depend on the following factors: 1) the number of HUD CoC-Funded projects that an agency has; and 2) the number of program models an agency has. For agencies with one to three projects, five files will be reviewed per project per section of the file review. For agencies with four or more projects, a minimum of two files will be reviewed per project if there are at least two projects of the same program model type. A minimum of five files will be reviewed if there is only one project of that model type at the agency.

Files will be selected for each of the three topic areas under review. The same files may not be selected for each area of review, although an effort will be made to do so. Selected files will include participants who are currently enrolled and participants who have exited the program. There will be a focus on recent files. Whenever possible, files will be chosen for participants who enrolled in 2020 or 2021. When this is not possible, files will be chosen according to those that are the most recent. Whenever possible, reviewers will also select files from a variety of each project's case managers, if there is more than one.

Results and Next Steps

The results will be shared in a Monitoring Summary Report within 2 weeks of the review. In cases where reviewers need to seek additional guidance on documentation requirements, reviewers will notify the agency if additional time is needed to finish the report.

Each topic of review has criteria that will be reviewed. Not meeting a set of criteria will cause a level of concern to be applied to the topic. The levels of concern are: zero concern, low concern, medium concern, and high concern. The Monitoring Instruction Manual contains the detailed criteria and factors which determine the levels of concern. A missing file earns an automatic high level of concern.

Projects that receive zero concerns across all topics of review have no additional steps to complete after receiving the report. If a project receives any low, medium, or high levels of concern, All Chicago will inform the agency of the Technical Assistance that will be made available. If a project receives a medium or high level of concern, there will be Technical Assistance and a Performance Improvement Plan. In cases where there are significant findings, All Chicago may adjust this process to better suit identified needs and priorities.

Connection with Intent to Renew Desk Audit

In the 2019 Intent to Renew (ITR), agencies submitted the following policies/procedures that directly correlate to the topics that are reviewed in the 2021 Targeted Client File Review: Intake Procedure and Packet, Eligibility Criteria, Discharge/Termination Policy, and Service Plan. If the agency has revised any of these policies/procedures since 2019, updated versions must be sent to All Chicago in the Pre-Monitoring Questionnaire. In general, the same criteria All Chicago used to evaluate ITR submissions is also being used to evaluate participant files. All Chicago staff will re-read relevant ITR submissions and during the review will notate whether the files contain evidence that the agencies are following the policies and procedures they submitted. When an agency/project demonstrates in a policy that it meets ITR and file review criteria and All Chicago finds through reviewing files that the criteria is not being followed in practice, this will result in a concern. If an agency/project goes beyond the outlined criteria to establish additional expectations for itself in its policy, All Chicago will evaluate whether these parts of the policy are also being done in practice. For any discrepancies in this regard, All Chicago will recommend that the agency follows its own standards but will not issue concerns.

Technical Assistance

Technical Assistance will be offered through a combination of virtual TA sessions, training, and resource sharing. In some instances, multiple agencies may be invited to attend group sessions with other agencies needing similar assistance.

Performance Improvement Plans (PIP)

To address any medium or high-level concerns, agencies will be asked to submit a Performance Improvement Plan (PIP) to All Chicago outlining the steps the program will take to mitigate the concerns going forward. The PIP will be due 30 days after the agency receives the Monitoring Summary Report. A conference call will be scheduled between the agency staff and All Chicago staff to review the PIP and make modifications as necessary. Approximately three months after the PIP is developed, All Chicago will check in with the agency and ask for a progress report.

The following will occur for agencies that 1) are required to develop a PIP but do not demonstrate adequate progress through progress reports or 2) are required to develop a PIP and do not:

1) All Chicago monitoring staff will provide two reminders or schedule two check-in appointments. If the issue still remains, All Chicago will advance to step #2.

2) All Chicago monitoring staff will consult with the All Chicago Executive Team.
3) All Chicago monitoring staff will consult with the Collaborative Applicant Committee (CAC).
4) CAC and the All Chicago Executive Team will make a recommendation on the next step, which may include informing the CoC Board.

B. Comprehensive Client File Review Process

If a project receives a high-level concern in two or more of the three topics reviewed in the Targeted Client File Review, this will cause a Comprehensive Client File Review to take place. This will consist of another file review that will be scheduled for reviewers to complete the Comprehensive File Review Tool with 6-10 files. Where additional concerns are found, All Chicago will identify additional TA to provide and the agency will develop a Performance Improvement Plan.

If multiple programs within an agency require Comprehensive Monitoring, All Chicago will combine the programs into a single Comprehensive File Review visit and a single Performance Improvement Plan, whenever possible.

Comprehensive Monitoring may be scheduled for other reasons as well, including but not limited to: requests from HUD to monitor an agency or program, concerns that arise from other procedures or interactions conducted by the CoC such as the Local Evaluation, Intent to Renew Desk Audit, and the Client Feedback Sessions. All Chicago will also consider requests from agencies who want to self-select participation in a Comprehensive Client File Review.

Agencies will receive Comprehensive File Review Results within 4 weeks of the review along with a list of TA that will be provided by All Chicago. The agency will be asked to propose a Performance Improvement Plan within 30 days. A conference call will be scheduled between the agency staff and All Chicago staff to review the PIP and make modifications as necessary. Approximately three months after the PIP is developed, the agency will submit a progress report to All Chicago. In cases where there are significant findings, All Chicago may adjust this process to better suit identified needs and priorities.

The following will occur for agencies that 1) are required to develop a PIP but do not demonstrate adequate progress through progress reports or 2) are required to develop a PIP and do not:

1) All Chicago monitoring staff will provide two reminders or schedule two check in appointments. If the issue still remains, All Chicago will advance to step #2.
2) All Chicago monitoring staff will consult with the All Chicago Executive Team.
3) All Chicago monitoring staff will consult with the Collaborative Applicant Committee (CAC).
4) CAC and the All Chicago Executive Team will make a recommendation on the next step, which may include informing the CoC Board.