

Project Evaluation and Assistance Committee Monitoring Plan

The BOSCOC Board of Directors is responsible for ensuring compliance with the COC Interim Rule. The Interim Rule states that continuums of care are required to monitor and evaluate projects. Therefore, the Project Evaluation and Assistance (PEA) Committee is responsible for conducting the monitoring of current BOSCOC funded projects based on the following (and in no particular order):

- 1) The ranking from the most recent NOFA that was submitted
- 2) Recommendation from the Balance of State Continuum of Care Board of Directors, which can include recommendations from the Data Committee, the Fiscal and Planning Committee and from the Department of Housing and Urban Development-Milwaukee Office.

Each year the PEA Committee will complete or provide:

- 1) Up to two on-site monitoring visits
- 2) Up to two desk monitoring events (desk monitoring events will begin in 2014)
- 3) Requests to the PEA Committee, from BOSCOC funded projects, to provide technical assistance will be honored, within reason.
- 4) Information on best practices.
- 5) New BOSCOC projects will be provided with technical assistance.

The following criteria have been established:

- 1) An agency will be notified six to eight weeks in advance of the in-person and desk monitoring visits
- 2) The number of PEA members to participate in a monitoring will depend on the number of projects in that agency and the size of the grant

In the course of a monitoring visit, the PEA Committee will review the following, but is not limited to (a standardized tool will be developed based upon information found in the SHP Desk Guide, SHP Self-Monitoring Tool, and the HEARTH Interim Rule):

1) Program Files:

- eligibility requirements
- disability determination (if applicable)
- income verification (eligible to pay rent, supportive services documentation)
- termination/grievance process
- homeless documentation
- assessments
- case notes and files
- service plans
- progress reports and goal achievement



2) Program Files, cont.

- rent calculations
- lease/sub-lease
- rent reasonability
- HQS inspections completed annually
- Lead brochure
- program manual
- program rules
- program non-compliance
- release of information
- Service Point authorization form

3) WISP:

- program entry and exit dates
- data quality/data completeness
- service transactions

4) Administration/Financial:

- match documentation
- LOCCS documentation
- program expenditures and supporting documentation
- time sheets of staff being billed to the grant and supporting documentation
- billing documentation and supporting documentation
- partner agency visits (face to face or phone interviews)
- grant allocations
- agency audits
- financial controls (how is money coming in and out of the agency)
- budget controls (what is the process)
- cash management procedures
- agency policies and procedures for financial management and procurement
- balance sheets
- property controls
- 5) Operations:
 - program policy and procedure manuals
 - most recent APR
 - copy of application with budget
 - match documentation for operations



- agency policies and procedures
- units that are owned: insurance, maintenance schedules, etc.

6) Leasing Information (if applicable):

- Leases/sub-leases/agreements with clients
- leases/agreements with landlords
- qualified HQS staff
- HQS documentation
- usage of fair market rents
- rent reasonableness
- lead requirements
- unallowable costs
- rent calculations and lease
- landlord interviews (face to face or over the phone)
- occupancy agreement requirements.
- apartment inspections

7) Sub-grantee Information:

- timeliness of paying subs
- sub-grantee contract including budget
- evidence of monitoring of sub-grantees.

8) Other CoC Interim Guidelines such as, but not limited to:

- no program fees being charged
- having a homeless or formerly homeless individual on the Board of Directors

9) In-person Interviews

- client interviews (face to face)
- staff interviews
- collaborative agency interviews
- interviews with board members

When the monitoring has been complete the following will occur:

- 1) A letter identifying the concerns found through the monitoring will be sent to the Executive Director of the monitored agency, the Board President and the BOSCOC Board of Directors, along with a corrective plan of action if necessary.
- 2) The letters to both the Executive Director, the Board President and the BOSCOC Board of Directors will summarize:



- a) the issues/concerns identified;
- b) the corrective plan of action or consequences;
- c) the date that these actions need to be completed by;
- 3) The monitoring team who conducted the original monitoring will conduct a re-review of the agency after the correction plan has been fully addressed by the agency that was monitored.
- 4) After the follow-up review, the monitoring team will send a summary of the results of the second monitoring to the Executive Director, the Board President and the BOSCOC Board of Directors.
- 5) If issues or concerns exist after the second monitoring the Balance of State Continuum of Care Board of Directors will decide what the next steps will be in regards to reallocation of funds.

The COC Program Interim Rule requires continuums of care to monitor program performance within the BOSCOC and to provide feedback, recommendations, and corrective actions as a result of monitoring. HUD has consistently emphasized the importance of effective and efficient use of funding. As a result, the Project Evaluation and Assistance Committee may recommend a reallocation of funds to the BOSCOC Board of Directors, if the nature or the issues/concerns are such that they may warrant such action.

2014 Monitoring Schedule

Dates of when the monitoring will occur will be decided at a later date.

On-site Monitoring

- # 40 City of Appleton Transitional/Fox Cities, #39 City of Appleton Permanent/Wireworks and #25 Housing Partnerships/It Takes a Village
- #35 NCCAP Transitional/The Big Ten

Note: The monitoring of the new West CAP projects that were assumed from Starting Points, given these projects were monitored in 2013.

Desk Monitoring

- #20 CACSW Transitional/Jefferson
- #19 State of Wisconsin Shelter Plus Care/Rock County Shelter + Care