West Virginia Coalition to End Homelessness

Monitoring Policy for Homeless Services Grantees and Vendors

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Section 1 Overview and Purpose of Monitoring

Monitoring is the primary way by which the WV Coalition to End Homelessness (WVCEH) ensures that the programs funded under the Continuum of Care (CoC) and the Department of Health and Human Resources (Department), Bureau for Social Service (BSS) are carried out efficiently, effectively, and in accordance with the Department Homeless Services Policy and the CoC Interim Rule. WVCEH views monitoring as a collaborative partnership with agencies that results in positive growth for the state's homeless response system. WVCEH monitoring is an on-going technical assistance process by which WVCEH works collaboratively with the grant-funded project of homeless service providers to ensure performance meets CoC-established benchmarks. If performance and administration of the grant(s) does not meet benchmarks or the Department and WVCEH established guidelines, technical assistance and guidance will be provided to grant-funded homeless services providers to strengthen program performance to improve shelter outcomes for the entire state. Often, WVCEH provides both monitoring and some sort of training to front-line staff on best practices at the same time.

The WVCEH Monitor travels to Department-funded agencies throughout the state to conduct annual monitoring visits. The WVCEH Monitor is responsible for ensuring that all grant-funded homeless services providers meet grant guidelines, performance measures, and best practices as outlined in this policy and the Homeless Services policy. These visits are scheduled in advance with homeless services provider leadership in an effort to allow agencies to prepare and be aware of any upcoming expectations. If an agency is also funded through the Emergency Solutions Grant (ESG), both WVCEH and the WV Community Advancement and Development (WVCAD) Office will coordinate co-monitoring.

In an effort to understand which programs in the state are utilizing best practices and procuring the highest outcomes, results of program monitoring will be evaluated. Details on scoring criteria can be found in [Section 5.3 Department Monitoring Scoring Criteria](#).

Section 2 Scope of Review

Using Chapters 29 and 34 of the [CPD Monitoring Handbook 6509.2](#) and the Department's Homeless Services Policy, the WVCEH Monitor reviews the following performance of Department-funded projects by each of the following components:

- Overall Grant Management
- Homeless Documentation and Recordkeeping Requirements
- Homeless Management Information System (HMIS) Program and DEPARTMENT Program Requirements
- Department Financial Management
- System Performance Measures

In addition to completing a review of the above components using the CPD guide, Chapters 29 and 34, WVCEH Monitor will also complete a comprehensive review of the following documents to gauge whether programs are low-barrier and are providing support to program participants to promote long-term sustainability:
- Client intake procedures and documents

- A sampling of client files from the selected fiscal year

Section 3 Definitions

Continuum of Care (CoC)	A regional or local planning body that coordinates housing and services funding for homeless families and individuals. A CoC is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
CoC Lead Agency	Agency that is designated to carry out the activities of the CoC or grant including fiscal and compliance activities. Regular administrative tasks may include but are not limited to management of the annual Housing and Urban Development application, coordination of other funding opportunities, project and system monitoring, and meeting management. WV Coalition to End Homelessness is the CoC Lead Agency for the Balance of State (BoS) CoC.
Coordinated Entry System (CES)	An approach to coordination and management of a crisis response system's resources that allows users to make consistent decisions from available information to efficiently and effectively connect people to the appropriate intervention, in the right order, in the most objective and efficient manner possible.
Emergency Solutions Grant (ESG)	A federal grant program that funds street outreach, homelessness prevention, emergency shelter, and rapid re-housing activities.
Diversion	A strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion programs can reduce the number of families becoming homeless, the demand for shelter beds, and the size of program wait lists.
Homeless Management Information System (HMIS)	A local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The information system designated by the Continuum of Care must comply with the HMIS requirements prescribed by HUD. The HMIS used in West Virginia Statewide HMIS Implementation, which includes all four CoCs, is ServicePoint
Homeless System	All of the services and housing available to persons who are literally homeless.
Literally Homeless (HUD Homeless Definition Category 1)	An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: 1. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

	2. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or 3. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Low-Barrier	Eliminate sobriety, income requirements, and other policies that make it difficult to enter shelter, stay in shelter, or access housing and income opportunities.
Personal Identifiable Information (PII)	Any information about an individual, maintained by an agency, which can be used to distinguish, trace, or identify an individual's identity, including personal information which is linked or linkable to an individual.
Prevention Services	Financial assistance and supportive services designed to prevent homelessness for an otherwise housed household.
Prioritization	Ensures that those persons with the greatest need and vulnerability receive the supports they need to resolve their housing crisis
Program Standards	A set of expectations developed by program funders/grant recipients across the state for each project type, based on HUD guidance and best practices, that the CoC-funded agencies, and other agencies funded through federal partners, are required to follow.
Project	Housing and/or supportive services intended to help people exit homelessness and sustain housing.
Provider	Organizations that serve program participants in projects funded by the CoC Program, ESG Program grants, and other federal partners (e.g. Veterans Affairs, Substance Abuse and Mental Health Services Administration). This includes grant recipients and sub-recipients.
VI-SPDAT, VI-F-SPDAT, TAY-VI-SPDAT	Vulnerability Index-Service Prioritization Decision Assistance Tool; Vulnerability Index-Service Prioritization Decision Assistance Tool for Families; and Transition-Age Youth Vulnerability Index-Service Prioritization Decision Assistance Tool are the standardized assessment tools used in the Coordinated Entry System. The VI-SPDAT series is a set of triage tools that are designed to be used by all providers within the Coordinated Entry System to quickly assess the health and social needs of people experiencing homelessness and match them with the most appropriate support and housing interventions that are available
West Virginia Coalition to End Homelessness (WVCEH)	The organization that acts as the state advocacy body for issues of homelessness in West Virginia. WVCEH is the CoC Lead/Collaborative Applicant and HMIS Lead for the BoS, the SOAR State Lead, and a direct service provider of street outreach, housing location and stabilization services throughout the 44-county catchment area.
West Virginia Community Advancement and Development Office (WVCADV)	The recipient of ESG funds from HUD and the administrator of several other state and federal programs designed to improve the quality of life in West Virginia (e.g., Housing Opportunities for Persons with AIDS [HOPWA], Community Development Block Grant [CDBG], Community Services Block Grant [CSBG], Weatherization Assistance Program).

Section 4 The Department, Emergency Solutions Grant, and Continuum of Care Coordination

The WVCEH is committed to aligning and coordinating CoC governance, eligibility determinations, and prioritization for administering the Department, ESG, and CoC Program funds. The WVCEH works closely with the state ESG grantee (the WVCAD Office) aligning efforts toward the goal of ultimately ending homelessness in West Virginia. Both parties cooperate to review performance of shelters receiving ESG and the Department's funding and plan to maintain an annual co-monitoring schedule across the state for all Department and ESG-funded programs. The WVCEH works closely with the WVCAD Office to evaluate, develop, and promote an expectation set for all HUD funded programs as it relates to the established CoC Coordinated Entry Process. When applicable, it is a primary goal among parties to align monitoring and project performance requirements for the Department, ESG, and CoC within the parameters of the federal regulations for funding streams regarding overall system performance standards, consistency, and compliance across programs.

Section 5 Monitoring

5.1 Monitoring Timeline

Annually, the WVCEH Monitor will send out a list of tentative dates to all agencies for on-site monitoring. The WVCEH Monitor will send out an official monitoring notice 30 days prior to the on-site visit at each agency, with a detailed check list of the programmatic items, fiscal items, and a list of selected client files requested for review. Within this notice, there will be a date listed for when items are due to the monitor prior to site visit. Providing requested items in advance will reduce the amount of time the monitor is on-site. Prior to the date of scheduled on-site monitoring, the monitor will also review previous fiscal year monitoring reports and quality improvement plans. On-site monitoring will be scheduled for one to two days according to the number and size of projects. On the day of on-site monitoring, the monitor will meet with the appropriate program supervisors and case management staff for an initial discussion. The WVCEH Monitor will complete an exit interview upon completion of monitoring. Fiscal staff should be available when monitor is on-site for related questions. The monitor will have 30 days following the date of on-site monitoring, or the final date of desk monitoring, to submit the monitoring score card to all appropriate staff at the Department -funded agency. The monitor will also schedule a follow-up call with the appropriate agency staff to discuss the Department project's score in detail if requested by the agency.

5.2 Outline of Monitoring Activities

Overall Grant Management
This section is designed to assess the overall administration of the recipient's Department Funded Program project(s).
- The WVCEH Monitor will review the recipient's agreement(s), grant agreement(s), and any amendment(s) to the grant agreement(s) with WVCEH for the project(s) being monitored to ensure all operations are within the scope of eligible activities. It is important to keep in mind that the monitor is reviewing a State Fiscal Year (SFY) project. This means that the project will begin operations on July 1 of the year it was awarded and ends June 30 the following year.

- The WVCEH Monitor will review the recipient's process for reporting significant program changes to WVCEH.
  - The WVCEH Monitor will review and determine that the recipient established and maintained standard operating procedures to ensure that Department Program funds were used in accordance with the provisions of the McKinney-Vento Homeless Assistance Act, 24 CFR 578.103(a). Recipient policies and procedures should include the following:
    - Intake procedures demonstrating participation in the CoC's Coordinated Entry System (CES) and compliance with CoC guidance. See, HUD Coordinated Entry Notice: CPD-17-01.
    - Process for record keeping requirements. See, 24 CFR 578.103(a)(3) and 24 CFR 576.500(b).
    - Equal opportunity statement- Fair Housing, Non-Discrimination and Reasonable Accommodations policies, including procedures for how the recipient implements its programs in a manner that affirmatively furthers fair housing. See, 24 CFR 578.93.
    - Process of maintaining confidentiality of client records. See, 24 CFR 578.103(b).
    - Case management roles and requirements. See, 24 CFR 578.53 and 24 CFR 578.37(a)(1)(ii)(F).
    - Discharge planning to mainstream housing. See, 24 CFR 578.1(b)(3) and 24 CFR 578.3.
    - Termination and Complaint/Appeals policies and procedures. See, 24 CFR 578.91.
    - Record Retention policies and procedures. See, 2 CFR 200.333 and 24 CFR 578.103(c).
    - Drug-free workplace policies and procedures. See, 24 CFR 578.99; 24 CFR 5.105(d); and 2 CFR part 2429.
    - Conflict of Interest Policy. See, 2 CFR 200.318(c)(1)&(2); 24 CFR 578.95; and 24 CFR 578.103(a)(11) and (12).
    - Transparency Act reporting. See, 2 CFR Part 170 and 24 CFR 578.99(c).
    - Homeless Management Information System (HMIS) or comparable data base participation and reporting requirements See, 24 CFR 578.103(e) and https://www.hudexchange.info/programs/hmis/hmis-regulations-and-notices/].
    - Performance and on-going assessment requirements [24 CFR 578.103(e).

Homeless Documentation and Recordkeeping Requirements

In this section, the WVCEH Monitor is responsible for determining whether sufficient supporting documentation is included in or is missing from the program participant relevant files to support conclusions, including any finding(s) or concern(s) noted in the final monitoring report. To monitor this area, the following will be requested:

- The WVCEH Monitor will extrapolate a listing of project program participants from the selected reporting period, including their entry dates, from the Homeless Management Information System (HMIS).

- From the HMIS listing, the monitor will select a random sampling of client files to review, supplemented by recipient staff interviews.
- The WVCEH Monitor will review the recipient's client intake packet. It is important to note that there are program-specific requirements and those documents should also be included in the intake packet. Recipient intake packets should include the following:
  - Documentation of Citizenship: The monitor will review the recipient's or subrecipient's procedures for obtaining documentation of citizenship for program participants (e.g. birth certificate, social security card, photo identification, state benefits cards, jail records). This documentation should be uploaded in HMIS or available for review in the client file. **The recipient or subrecipient should work with the Coordinated Entry System to obtain this documentation as quickly as possible; however, obtaining this documentation should NOT prevent a household from services.**
  - Coordination with the CoC Coordinated Entry System: The WVCEH Monitor will review evidence of participation in the established CoC Coordinated Entry System (CES):
    1. The use of HMIS to obtain documentation of client need, length of time homeless and services for the purposes of prioritization, eligibility determination, and permanent housing referrals.
    2. On-going communication with the CES through evidence of referral acceptance rates, case notes, and timeliness in updating unit lists in HMIS.
    3. Reduction in the length of time from shelter assessment to CES referral to project enrollment to move-in.
  - Diversion Attempts: The WVCEH Monitor will review evidence of diversion attempts within HMIS or client file.
  - The Department Homeless Services Grant Program (HSGP) Grievance Policy: The WVCEH Monitor will review client files to ensure clients have been informed of policy and given written policy on filing grievances.
  - Individualized Housing-Focused Service Plan: The WVCEH Monitor will review client records to ensure that a housing plan is included in the file and specific to the individual. There should be evidence in the client record that goals are being set and that the case manager is working with the client to regularly assess and attain the goals
  - Updated and Complete Case Notes: The WVCEH Monitor will review client case notes in the HMIS to ensure they are being completed weekly at a minimum. Case notes should illustrate the client's situation, housing plan, barriers, and needs.
  - Connection to resources: The WVCEH Monitor will review client files and case notes to ensure clients are being connected with resources to increase employment/income and to obtain vital records.
  - Agency and HMIS Releases of Information (ROI): The WVCEH Monitor will review both HMIS and the client file for updated Agency and HMIS ROI signed by all adult household members.

Department Specific and HMIS Program Requirements

The WVCEH Monitor will assess the recipient's compliance with the Department and HMIS project components of the Department Homeless Services Grant Program and HUD/CoC.

- Department Specific Requirements:

- The WVCEH Monitor will review the project description in the approved grant application to ensure that the recipient is providing the approved type of supportive service.
- The WVCEH Monitor will review the diversion process within HMIS for recipients, as well as diversion strategies implemented by the recipient.
- The WVCEH Monitor will review intake process and paperwork to ensure that recipients are using a standardized intake and assessment process in accordance with HUD, HMIS, and CoC guidelines.
- The WVCEH Monitor will review shelter policies and operation handbook to ensure that shelters are operating as lower-barrier, trauma-informed, and housing-focused.
- The WVCEH Monitor will review financial documents to determine that grant funds were expended only for allowable costs.
- HMIS Specific Requirements: The WVCEH Monitor will assess the recipient's compliance with the Homeless Management Information Systems (HMIS) program component.
  - The WVCEH Monitor will review recipient's cooperation and involvement with the CoC's Coordinated Entry System.
  - The WVCEH Monitor will review client records in HMIS to ensure data is collected appropriately for individuals to be prioritized in accordance with the CoC Coordinated entry System.
- Case Management: The WVCEH Monitor will review client records to ensure regular, face-to-face meetings are occurring between case management staff and clients being served, at a minimum of once per week. The WVCEH Monitor will review client files and HMIS documentation to ensure that the recipient is providing the following to clients during the case management process:
  - Clarification of goals.
  - Negotiation towards a successful outcome.
  - Agreement of next steps and responsibilities.
  - Implementation of a course of action.
  - Summary of changes due to circumstances.
  - Changes or modifications to identified goals.
  - Barriers to achieving identified goals.
- Connection to Mainstream Resources: The WVCEH Monitor will review client records to determine that recipients are increasing access to and effective utilization of health care, behavioral health, and mainstream programs to promote housing stability.

Department Financial Management

The WVCEH Monitor will review reimbursement requests, quarterly reports, and the sworn statement of expenditures during the reporting period. These will be accompanied with source documentation including proof of approved payment request and processed payment (e.g. invoices, purchase orders, contracts, receipts, payroll).

- The WVCEH Monitor will review two reimbursement requests from the reporting period to ensure that grant expenditures were eligible costs, were necessary and reasonable for proper and efficient administration of the program, were allocable to the program, and supported by adequate source documentation.
- The WVCEH Monitor will review the source documentation to ensure it supports the amount requested from the payment reimbursement requests.

- The WVCEH Monitor will ensure that payments for salaries and wages are supported by documented payrolls and personnel activity reports as specified in the applicable cost principles.
- The WVCEH Monitor will ensure that each recipient's program includes one or more of the following grant funds—Personnel; Fringe Benefits; Equipment; Supplies; Contractual Costs; Construction; Other; and Indirect Costs. The monitor will review the grant agreement and financial records to determine that costs are eligible and being expended to the correct line item.
- The WVCEH Monitor will review financial records to ensure that program expenses are allowable, allocable, and reasonable.
- The WVCEH Monitor will review financial records to identify expenditures in accounting records are aligned with eligible program activities identified in the grant agreement.
- The WVCEH Monitor will review program expenditures to ensure the absence of any unallowable costs including entertainment, contributions and donations, fines and penalties, or general governmental expenditures.
- The WVCEH Monitor will review financial policies and procedures to ensure that the Department program funds are used in accordance with requirements and sufficient records to enable WVCEH and the recipients to determine whether Department and CoC requirements are being met.
- The WVCEH Monitor will review financial records to ensure the recipient maintain records that identify adequately the source and application of funds for federally sponsored activities. These records shall contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, outlays, income and interest.
- The WVCEH Monitor will review financial records to ensure that payments are not being provided directly to the program beneficiaries.
- The WVCEH Monitor will review if indirect costs are charged to the grant program by the recipient or its subrecipients, the costs are supported by an Indirect Cost Rate Proposal or Cost Allocation Plan prepared in accordance with OMB Circular A-87, Attachment A, Section F (for units of state and local government); OMB Circular A-122, Attachment A, Section C (for nonprofit organizations), see 24 CFR 578.99€; OMB Circular A-87 (for governments); or OMB Circular A-122 (for nonprofit organizations)].
- If Single Audits are required, the WVCEH Monitor will review if the recipient and its subrecipients have a system or methodology to ensure that such audits are conducted. There should be documentation available to demonstrate that the audits have been reviewed for compliance and that the recipient has taken appropriate follow-up actions, if necessary. The WVCEH Monitor will request a copy of the agency's most recent audit prior to monitoring.
- The WVCEH Monitor will request a copy of the agency's 990 prior to monitoring.
- The WVCEH Monitor will ensure that each recipient provides for the participation of not less than one person with lived experience on the board of directors or other equivalent policymaking entity of the recipient or have in place a consultation process with persons with lived experience to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part.
- The WVCEH Monitor will review financial records to ensure that the recipient has effective internal control over, and accountability of, all grant funds, property and other assets.
- The WVCEH Monitor will review if there is an organization chart that illustrates the actual lines of authority and responsibility.
  - Primary duties for key employees of the recipient should be clearly defined.

- The WVCEH Monitor will review approval controls that provide reasonable assurance that appropriate individuals approve recorded transactions in accordance with management's general or specific criteria.
- The WVCEH Monitor will review controls over the design and use of documents and records which provide reasonable assurance that transactions and events are properly documented, recorded, and auditable.
- The WVCEH Monitor will review that In the normal course of the position's requirements, duties should be segregated to effectively reduce the opportunity for someone to perpetrate or conceal errors or irregularities.
- The WVCEH Monitor will review the protocol for all personnel when communicating to the appropriate supervisory officials regarding operating problems and non-compliance with laws and regulations.
- The WVCEH Monitor will review internal control procedures that support the ability to prepare financial statements that are accurately presented in conformity with generally accepted or other relevant and appropriate accounting principles and regulatory requirements.

System Performance Measures

The WVCEH Monitor will pull reports from data collected in HMIS in order to review the following performance measures:

- Total number of households served.
- Diversion of individuals and families entering shelter.
- Average length of time in shelter.
- Positive exits to permanent housing.
- Returns to shelter in 6 months, 12 months, and 24 months.

5.3 The Department Monitoring Scoring Criteria

Each Department recipient will be evaluated on a 100-point scale. If a question on the score card is not applicable to the Department-funded project being evaluated, the total available points for that particular section will decrease. The final score will be a percentage of the project's total available points. Programs that receive 75% or below will be required to complete a quality improvement plan (QIP). In contrast, programs that illustrate high quality outcomes, compliance with best practices and procedures, and receive 76% or above will not be required to complete a quality improvement plan. Programs will be informed of their score within 30 days of their most recent evaluation.

- Overall Grant Management: 20 points.
- Homeless Documentation/Recordkeeping Requirements: 20 points.
- HMIS & Department Specific Program Requirements: 20 points.
- Department Financial Management: 20 points.
- Performance Measures: 20 points.
- Final Score Summary Sheet: Percentage of total available points and details on recommendations for any lower scores per section.