

Project Monitoring Policies and Procedures

# Introduction

The Maine Continuum of Care (MCOC) consists of agencies and interested parties that participate in providing services to people experiencing homelessness in the state of Maine. The US Department of Housing and Urban Development (HUD) provides funding to projects within the MCOC in order to provide housing and services to people experiencing homelessness. HUD provides this funding through an annual Notice of Funding Opportunity (NOFO). HUD requires that the MCOC monitor CoC-funded projects within its jurisdiction to ensure compliance with federal law, regulations, and performance standards; as well as standards and needs set forth by the MCOC.

These monitoring policies and procedures detail the priorities and processes of the MCOC in conducting this annual monitoring.

# Project Monitoring Committee

The entity charged with overseeing the monitoring process is the Project Monitoring Committee (PMC) of the MCOC. This is a standing committee of the MCOC, governed by its charter within the MCOC governance. It shall consist of at least one duly elected Chair, and shall strive to maintain a membership that consists of representatives from agencies that receive COC funds, as well as agencies that do not receive COC funds.

The PMC will be responsible for reviewing the data produced by program monitoring personnel, validating that data, and from time to time presenting that data to the MCOC at large, or any committee thereof.

# Collaborative Applicant

The MCOC’s Collaborative Applicant (CA), being the Recipient of the CoC Planning Grant, shall provide staffing to conduct the monitoring activities detailed below. Monitoring staff shall conduct monitoring and present their results to the PMC and/or MCOC as requested. At this time, the Collaborative Applicant for the MCOC is the Maine State Housing Authority (MSHA), otherwise known as MaineHousing.

# Monitoring Process

## Monitoring Schedule

At the start of each calendar year, the PMC and CA will generate a preliminary monitoring schedule for the upcoming year. This schedule will be disseminated to all funded agencies. Should a scheduling conflict arise, the funded agency will contact monitoring staff, and find a suitable alternative at that time. Once all conflicts are resolved, monitoring staff will issue a final schedule. At that point, monitoring staff may consider further schedule revisions, however are not obligated to reschedule at the project’s request.

## Announcement Letter

Thirty days prior to the scheduled monitoring visit, monitoring staff will issue a monitoring announcement letter. This letter will contain all pertinent information for the upcoming visit. The time, place, and modality (virtual, in person) of the visit will be specified. Monitoring staff will provide the number of client files to be reviewed, and a list of the required policies/reports to be submitted by the funded agency prior to the monitoring visit. In the case of Victims Service Providers, monitoring staff will request a de-identified client list, and will base the number of files to be reviewed on that data. All data requested in the announcement letter must be submitted to monitoring staff no later than two weeks prior to the monitoring visit.

## Monitoring Tool

Monitoring staff shall use a standardized monitoring tool, approved by the PMC and the MCOC, in conducting all monitoring visits. This tool will include areas for policy review, data, reporting, and security review, financial review, physical review, client file review, and performance review.

## Policy and Data Review (Monitoring Prep)

Prior to the monitoring visit, monitoring staff will review all submitted policies and reports. Monitoring staff will compare submitted policies and reports to requirements provided in HUD regulations, federal law, and MCOC standards. In any instance where a policy or report does not meet requirements, monitoring staff will note the deficient policy or report on the tool, and note the reason for deficiency. Monitoring staff will also review the three previous years’ monitoring materials, to determine if there are outstanding issues to be addressed in this year’s monitoring.

## Monitoring Visit

During the monitoring visit, monitoring staff will provide the agency with a list of client files for review. The number of files reviewed will be determined based on the number of clients served during the most recently completed grant year. A program that served 50 or fewer clients will have five files reviewed. Programs serving 51-600 clients will have five, plus one for each increment of 50 over 50. Programs serving 601-2000 clients will have 16 files reviewed, plus one for each increment of 100 over 600.

Monitoring staff will observe the security and confidentiality safeguards in the administrative offices, and check to ensure required postings are present in spaces utilized for client interactions. Monitoring staff will then conduct a conference with the agency staff to review any issues observed in the policies and reports submitted prior to the visit.

Following the conference, monitoring staff will review the requested client files, and note any discrepancies or issues in the monitoring tool.

At the conclusion of the visit, monitoring staff will again convene with the agency staff to complete an exit discussion. During this discussion, monitoring staff will offer a brief summary of what they have observed. This would not be considered a comprehensive listing of all issues discovered, but rather an overview of any themes noted by monitoring staff.

## Monitoring Follow-Up

After the visit, monitoring staff will review all the data collected on the tool, and determine whether or not there are findings or concerns. Findings are issues found in materials reviewed which are in direct violation of federal law, relevant federal regulations, or MCOC governance. Concerns are issues which are not in direct violation, but may lead to future findings.

Monitoring staff will compose a summary letter which includes a listing of all findings and concerns. This letter, along with the completed monitoring tool, will be sent to the Chair(s) of the PMC. The Chair(s) will then review the tool and letter with the full PMC at their next monthly meeting.

The PMC will determine the final findings and concerns to be issued, based on the data presented by monitoring staff. Following the meeting, monitoring staff will send the completed letter with the PMC Chair(s)’ endorsement to the monitored agency.

In order to prevent conflicts of interest, any member of the PMC that is employed by the agency being monitored, or any member that is a subrecipient of the grant being monitored, must recuse themselves from the decision making process regarding findings and concerns.

The agency must respond to any findings within 30 days, in the form of a letter detailing steps taken to remedy the findings issued. Concerns do not require a response. The PMC will determine whether or not the response is sufficient. Once all responses are deemed sufficient, monitoring staff will issue a reconciliation letter, which details the findings and the actions taken by the agency to remedy those findings.

## Repeated Findings

During a monitoring review, monitoring staff will make note of any findings that were issued during the previous year’s monitoring cycle. Should the same issue be observed during that year’s monitoring review, the monitoring staff will note it as a repeated finding. When the PMC issues the follow-up summary letter, any repeated findings will be marked as such.

# Recommendations, Technical Assistance and Corrective Actions

## Recommendations

After the completion of monitoring, the PMC, in consultation with the monitoring staff, may issue recommendations to the monitored agency. These recommendations may include revising policies or workflows in order to avoid future findings or concerns. The PMC may also recommend technical assistance (TA), either at the state level, or from a HUD TA provider.

## Technical Assistance (TA)

In instances where persistent or significant issues have been noted in monitoring, the PMC may recommend TA. TA may be provided in different modalities. At times, the monitoring staff may conduct TA. In other instances, the PMC may connect the monitored agency with another agency within the COC that has specific expertise in the area that needs TA. In some cases, the expertise to provide TA may not be present within the COC. In those instances, the PMC may refer the monitored agency to existing HUD resources, or may recommend the monitored agency request TA from HUD.

## Corrective Actions

Should an agency be found to be significantly in violation of laws, regulations, or COC requirements, the PMC may recommend corrective actions. The PMC may take this action in cases where the monitored agency has received repeated findings over three or more years, and has not made meaningful progress toward correcting the issue. Corrective actions may also be recommended for single instances that are significant violations of federal law. For example, documented instances of fraud may require corrective action for a single instance.

The PMC may recommend corrective actions such as censure, referral to HUD, reduction of grant, or exclusion from future CoC funding. The PMC may also consider other corrective actions as suited for the situation.

Should the PMC recommend corrective actions, the PMC Chair or their designee will bring that recommendation to the next full MCOC meeting. The PMC Chair or designee will introduce a motion to the COC to consider the corrective actions. The COC will consider the recommendation, and may approve, deny, or amend the corrective actions. To prevent conflicts of interest, the agency for whom corrective actions are recommended will automatically be recused from the decision. Any subrecipient of the grant in question will also be recused.

# Recordkeeping

## Responsibility

Detailed records of monitoring shall be kept for a minimum period of five years. Completed monitoring tools, follow-up letters, and subsequent correspondence shall be maintained in the monitoring file for that year’s grant. The Collaborative Applicant shall be responsible for maintaining custody of all monitoring data for the minimum retention period.

## Access

All monitored agencies will be provided with a copy of their completed monitoring tool, their follow- up letter, and reconciliation letters at the conclusion of the monitoring process. The monitoring agency may request their monitoring materials be retransmitted at any time during the retention period.

The Collaborative Applicant will transmit all monitoring materials to HUD immediately upon request.

The MCOC, its leadership, board, and relevant committees or subcommittees may request monitoring materials or aggregate monitoring data from the Collaborative Applicant as needed; the Collaborative Applicant shall transmit requested material to the requesting body promptly.

Members of the public may access any monitoring materials by submitting a Freedom of Information Act (FOIA)/Freedom of Access Act (FOAA) request to the Collaborative Applicant. The Collaborative Applicant will use their standard process for FOIA/FOAA requests.

# Appendix A- Required Documents for Monitoring

## Policies- Submitted every 3 years

* Intake policy
* Client Confidentiality Policy
* Debarment verification Policy
* Religious Practices Policies, if applicable
* Termination Policy
* Educational Services Policy
* Fair Housing Policy
* Persons With Lived Experience of Homelessness participation Policy
  + Number of PLWEH on decision making body
* Drug-Free Workplace Policy
* Conflict of Interest Policy
  + Current Conflict of Interest disclosure
* Lead Hazard Policy& Notices
* Food Provision Policy (PSH Only)
* Emergency Transfer Plans
* Cost Allocation Policy – How expenses are allocated to grants
* Procurement Policy
* Record Retention Policy
* Whistleblower Policy
* Fiscal Control Policies

## Reports/Documentation- Submitted annually

* Annual Performance Report (APR)
* Project Application
* Grant Agreement
* HMIS data quality report (pulled by monitoring)
* Project Participation report (pulled by monitoring for non-DV)
* Environmental Reviews
* Housing Quality Standards (HQS) reports
* PWLEH participation form

## Financial Documents- Submitted annually

* Most recent Financial and Uniform Guidance Audit Report
* A copy of the approved indirect rate agreement (If Applicable)
* Organizational Chart
* Chart of Accounts
* Job descriptions for key financial employees
* Profit and Loss Statement
* General Ledger detail for entire grant period
* Payroll distribution reports and required activity reports to support time cards for grant period