



# Metro Denver Homeless Initiative Continuum of Care System Performance Monitoring Plan

## I. Purpose

The primary purpose of the [MDHI Continuum of Care \(CoC\)](#) is to carry out the responsibilities of a CoC as defined by the CoC Program Interim Rule (24 CFR 578). A significant part of these responsibilities is the creation and implementation of a System Performance Monitoring Plan for monitoring the performance of recipients and subrecipients of CoC and Emergency Solutions Grants (ESG) Program funding. This plan strives to improve outcomes for persons experiencing homelessness who are receiving assistance through these projects and achieving MDHI's vision for everyone in the metro region to have a safe, stable place to call home.<sup>1</sup>

The MDHI CoC must consult with recipients and subrecipients of CoC and ESG Program funding operating within the boundaries of the CoC (hereafter referred to as 'grantees') to establish performance targets, monitor recipient and subrecipient performance, evaluate outcomes, and act against poor performers.<sup>2</sup> The System Performance Monitoring Plan will provide the necessary structure to comply with regulatory requirements as well as advance the MDHI CoC's efforts to end homelessness across the region.

## II. Roles and Responsibilities for the MDHI CoC

MDHI's Governance Charter assigns overall and project-level performance responsibilities to the CoC Board, the CoC Lead Agency and the HMIS Lead Agency. The Metro Denver Homeless Initiative is currently the CoC Lead Agency and the HMIS Lead Agency.

Its staff sit on and provide support to the Committees and Councils created by the CoC to implement the CoC's responsibilities. These Councils will work together to monitor system performance, including but not limited to desk monitoring, on-site visits, one-on-one technical assistance and HMIS data reports.

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<sup>1</sup> MDHI CoC, Governance Charter, IV.

<sup>2</sup> CoC Program Interim Rule, CFR § 587.7 (a) (6).

Councils with specific responsibilities for the System Performance Monitoring Plan are identified in the following table:

| Responsible Party  | Responsible Category                  | Responsibility  |
|--|---------------------------------------|---|
| <b>System Performance Council/Regional Governing Council</b> | Overall and Project-Level Performance | Establish performance targets in consultation with recipients/subrecipients |
| <b>System Performance Council</b>                            | Overall and Project-Level Performance | Monitor recipient/subrecipient performance; measure system performance      |
| <b>System Performance Council</b>                            | Overall and Project-Level Performance | Evaluate outcomes for ESG and CoC projects and report back to HUD           |

Resources referred to in this plan to conduct and prepare for monitoring visits for recipients and subrecipients of CoC Program and ESG Program funding are found here: [https://www.mdhi.org/coc\\_and\\_esg\\_program\\_monitoring](https://www.mdhi.org/coc_and_esg_program_monitoring) and in [Appendix I](#). Additionally, the MDHI CoC has established a regional review focusing on the CoC’s specific performance goals for ending homelessness. This regional review is Appendix II.

### **III. Roles and Responsibilities for ESG and CoC Program Fund Recipients and Subrecipients (Grantees) Operating within the CoC**

All ESG and CoC funded programs are subject to the most current regulations established by HUD. Additional requirements may also exist for these programs based on local priorities and goals. Funded programs are responsible for reviewing, understanding and complying with these regulations and requirements.

ESG federal regulations are in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments at 24 CFR Parts 91 and 576 ([https://www.hudexchange.info/resources/documents/HEARTH\\_ESGInterimRule&ConPlanConformingAmendments.pdf](https://www.hudexchange.info/resources/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf)). CoC program regulations are in the CoC Program Interim Rule at 24 CFR Part 578 ([https://www.hudexchange.info/resources/documents/CoCProgramInterimRule\\_FormattedVersion.pdf](https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf)).

Monitoring is a requirement for recipients and subrecipients of ESG and CoC funds. This offers an opportunity for projects to self-evaluate their own processes and procedures for grant

implementation, as well as show the project's contribution to the CoC's priorities and goals to end homelessness.

## IV. Project Performance and Compliance Monitoring

### Monitoring Criteria

MDHI will monitor grantees for performance and compliance on the following criteria:

- **Grantee Performance**  
Grantees will be monitored annually on project performance measures including the following: Housing Stability Exits to Permanent Housing, Increase in Income, Cost per Household, Fund Utilization, Recaptures, and other measures that may be added.
- **OneHome Compliance**  
100% of referrals come through OneHome, the coordinated entry system. If a referral is denied, a Housing Denial Form is completed, and the vacancy is ultimately filled through OneHome. Programs must adhere to OneHome Policies and Procedures.<sup>3</sup>
- **Rapid Rehousing Standards Compliance**  
All CoC and ESG funded RRH programs must adhere to the MDHI RRH Standards.<sup>4</sup>
- **LOCCS Drawdown Compliance**  
Grantees are required to draw down funds on a quarterly basis. All grantees are required to submit Quarterly Reports of LOCCS drawdowns to the CoC. Drawdowns and expenditures will be monitored and TA provided as necessary.
- **Recapture of Funds**  
Grantees will be monitored on a quarterly basis for the potential of recapture of funds. Grantees with large and frequent recaptures will be subject to loss of funding at grant renewal decisions/annual funding competitions.
- **Financial Management Compliance**  
Grantees will be monitored regarding compliance with applicable regulations including U.S. Department of Housing and Urban Development (HUD) guidelines referenced in publication 2 CFR 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and the OMB Circular A-122. Grantees will be evaluated on allocability, reasonability, and allowability of all costs incurred by CoC and ESG funds.

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<sup>3</sup> [https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/336/attachments/original/1519946587/OneHome\\_P\\_P\\_Final\\_2018.pdf?1519946587](https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/336/attachments/original/1519946587/OneHome_P_P_Final_2018.pdf?1519946587).

<sup>4</sup> [https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/234/attachments/original/1533321359/RRH\\_Standards\\_Denver\\_FINAL.pdf?1533321359](https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/234/attachments/original/1533321359/RRH_Standards_Denver_FINAL.pdf?1533321359).

- **Annual Performance Report (APR) Timely Submission**  
A notice will be sent to grantees 90 days before the APR is due, with an additional reminder 30 day prior to due date. TA will be provided as needed for complete and timely submission.
- **HMIS Compliance**  
HMIS compliance will be monitored separately by the HMIS Lead Agency, and results of HMIS monitoring will be incorporated into the overall program monitoring described in this document.

## Quarterly Reporting

All grantees are required to prepare and submit quarterly reports to MDHI via the CoC grantee portal found here: *{in development, will update with link}*. The content for quarterly reports is established by the CoC and includes, but is not limited to the following:

- HMIS data reports (APR/CAPER)
- Quarterly reports of LOCCS drawdowns grantee has submitted to HUD
- HMIS Data Quality Report
- Copies of any OneHome 'Housing Denial Forms' submitted for the quarter
- List of current staff and contact info. For program (if any changes from previous quarter)
- Current average caseload size for program
- Cost per household served
- Quarterly spending by line item

Please note: Reports and other information should cover the most recently completed quarter only as outlined in the Submission Schedule (see below). MDHI may require additional reports as determined by MDHI Board of Directors, staff and System Performance Council. Written notification for additional quarterly reporting requirements will be communicated to agency executive director or their designee no later than thirty days prior to the start of the reporting period.

### Submission Schedule:

- 1st Quarter Report: due April 30; reporting period = January 1–March 31.
- 2nd Quarter Report: due July 31; reporting period = April 1–June 30.
- 3rd Quarter Report: due October 31; reporting period = July 1–September 30.
- 4th Quarter Report: due January 31; reporting period = October 1–December 31.

## Monitoring Visits

In addition to reviewing the information submitted quarterly by each grantee, the CoC will conduct annual on-site monitoring visits. The grantee will be notified in writing prior to an on-site monitoring visit.

Preparation for a monitoring visit includes, but is not limited to, the following:

- Appropriate Client file documentation (see [Appendix I](#) for resources)
- HMIS data entry (or comparable database) completed/up-to-date
- Familiarization with HUD Exhibits noted on monitoring notification
- Familiarization with regional review document
- Financial records prepared for review
- Interviews with program staff

Project staff should be ready to provide physical space and internet connection for the monitor, have participant files and financial documents (including back-up) readily accessible, and have relevant staff on-site to answer questions. Within fifteen days following the site visit, the monitor will send an evaluation review to the project's executive director or other designee. If there are performance corrections needed, the monitor will follow the performance corrective action process found in Section V.

## V. Performance Monitoring

Monitoring evaluation reviews are kept on file for each project by the CoC. Results of reviews are used to improve project and system performance, contribute data for ESG and CoC federal grant applications, and inform ESG and CoC funding eligibility and awards at federal, state and regional levels (i.e. CoC NOFA and ESG RFP process).

These reviews collectively provide CoCs the opportunity to see performance at a system-level, making it possible to see overall progress toward ending homelessness as well as specific areas where performance improvement can enhance the CoC's efforts.

### Quarterly Report Information

The information submitted by grantees in the quarterly reports will be synthesized by MDHI staff and shared with the CoC System Performance Council and Regional Governing Council. This information will be shared with MDHI committees (e.g. NOFA Review Committee, Data Committee) as determined by MDHI staff and councils.

For the first and second quarter of 2019, information will be shared publicly in aggregate form and by program (but without identifying programs by agency or program name) via reports and dashboards posted to the CoC website and presented at CoC meetings. The System Performance Council will make recommendations to the CoC Board regarding identifying programs by name for future quarters.

Information submitted by grantees in quarterly reports will be used as part of the annual NOFA review process. It will also be used to determine the on-site monitoring schedule for grantees.

### **On-Site Monitoring**

- Results of on-site monitoring will be shared in writing with grantee within 15 days of the monitoring visit. The written monitoring results will also be shared with the CoC System Performance Council and Regional Governing Council. This information will also be shared with MDHI committees (e.g. NOFA Review Committee, Data Committee) as determined by MDHI staff and councils.
- Areas flagged for improvement will be noted in the evaluation review by the monitor.
- The project staff and the monitor will create a performance correction plan, as described in Section VI.
- If the grantee disagrees with monitoring results, they may complete an appeal, which will be reviewed by CoC staff and the System Performance Council.
- Appeals must be submitted no more than 30 days following receipt of monitoring results. The appeal form must be included, and grantee may include other supporting documentation.
- Appeals will be submitted to the System Performance Council for review. Grantees must continue to abide by any performance improvement plan that is in place unless notified in writing by the CoC. Grantees will be notified in writing regarding the results of their appeal.

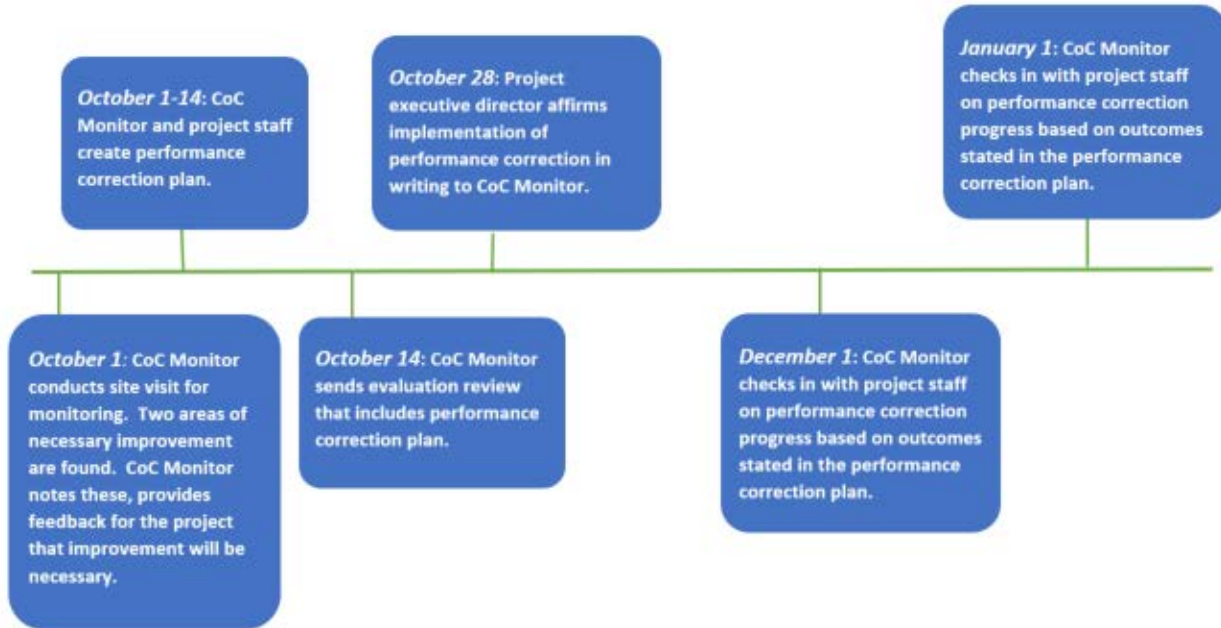
## **VI. Performance Improvement and Corrective Actions**

A monitoring may illuminate areas where a project needs to improve its performance. In this instance, each area flagged for improvement is specifically noted in the evaluation review by the monitor. The project staff and the monitor will work together to create a performance improvement plan and identify where specific technical assistance is needed for improvement.

The performance improvement plan will be shared with the grantee's Executive Director or their designee, as well as with the System Performance Council and relevant committees. A grantee who disagrees with the contents of a performance improvement plan may complete an

appeal. The appeal form is posted here:  
[https://www.mdhi.org/coc\\_and\\_esg\\_program\\_monitoring](https://www.mdhi.org/coc_and_esg_program_monitoring)

### Sample Timeline of a Monitoring



*Then the next quarterly report either:*

- Shows progress, and the CoC Monitor continues quarterly desk reviews according to timeline; or
- Does not show progress, and follow-up steps are taken as described below in “Additional Corrective Actions.”

### Additional Corrective Actions

If progress is not made per the timeline outlined in the performance improvement plan, the following will occur (the quarters in the tables below indicate the quarter following the implementation of the project improvement plan):

| CoC Programs                      | Action  |
|-----------------------------------|---|
| 1 <sup>st</sup> Quarterly Report: | In person meeting with agency staff and representatives from MDHI staff and System Performance Council.   |
| 2 <sup>nd</sup> Quarterly Report: | Written warning of financial consequences sent to agency executive director and copied to System Performance Council and MDHI Board of Directors. |
| 3 <sup>rd</sup> Quarterly Report: | Recommendation from System Performance Council to MDHI Board of Directors, which may include reallocation of funding (in full or partial).        |
| 4 <sup>th</sup> Quarterly Report: | Program funds reallocated in next NOFA funding cycle.   |

| ESG Programs                      | Action   |
|-----------------------------------|--|
| 1 <sup>st</sup> Quarterly Report: | In person meeting with agency staff and representatives from MDHI staff and System Performance Council.  |
| 2 <sup>nd</sup> Quarterly Report: | Written warning of financial consequences sent to agency executive director and copied to System Performance Council and MDHI Board of Directors.  |
| 3 <sup>rd</sup> Quarterly Report: | Project's executive director is notified in writing that funding on the grant is 'frozen' and no spending on the grant will be reimbursed until such time as funding is reinstated by MDHI in writing. |
| 4 <sup>th</sup> Quarterly Report: | Project's remaining funds are re-allocated, and project is ineligible to apply for the next funding cycle.   |



# Appendix I

## Resources

CoC Program Law, Regulations, and Notices

<https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#regulations>

CPD Monitoring Guide (Chapter 28: ESG Program, Chapter 29: CoC Program)

[https://www.hud.gov/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2)

2 CFR Part 200: Overview for Grantees

<https://www.hud.gov/sites/documents/CFR200.PDF>

Homeless Definition Recordkeeping Requirements and Criteria

[https://www.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

CoC Rapid Rehousing Standards for CoC and ESG

[https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/234/attachments/original/1533321359/RH\\_Standards\\_Denver\\_FINAL.pdf?1533321359](https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/234/attachments/original/1533321359/RH_Standards_Denver_FINAL.pdf?1533321359)

For additional resources:

HUD Exchange (<https://www.hudexchange.info/>)

CoC Website (<https://www.mdhi.org/>)

## Appendix II

### Regional Review

Housing First Self-Assessment

[https://d3n8a8pro7vhm.cloudfront.net/mdhi/pages/787/attachments/original/1528474087/HF\\_Questionnaire\\_NOFA\\_060818.pdf?1528474087](https://d3n8a8pro7vhm.cloudfront.net/mdhi/pages/787/attachments/original/1528474087/HF_Questionnaire_NOFA_060818.pdf?1528474087)

Rapid Rehousing Self-Assessment

<https://www.surveymonkey.com/r/RRHself-assessment>