CoC Compliance and Monitoring Process and Tools

Presentation for the Eastern and Western PA CoCs – January 2022

AGENDA

- Background
- Data and Performance Monitoring Report (CoC and ESG)
  - Overview
  - Walk through the tool
  - Questions
- Compliance Desk Monitoring Tools (CoC Only)
  - Overview
  - Walk through the tools
  - Questions

Background

Per the HUD CoC Interim Rule, CoCs are required to:

Evaluate outcomes of projects funded under the ESG and CoC programs, and report to HUD	Consult with grantees to establish performance targets appropriate for population and program type
Monitor grantee performance and evaluate outcomes	Take action against poor performers

Background

Historically, this monitoring has been done through:

- Annual CoC NOFA/NOFO Competition (for CoC grantees)
- ESG on site monitoring from DCED (for ESG grantees)

Moving forward, the CoCs will have a year-round evaluation process that will:

- Give grantees tools for self-monitoring
- Flag potential performance and compliance issues for correction

NEW TOOLS:
## Compliance and Monitoring Tools Overview

Data and Performance Monitoring Report

- **Purpose:** Provide a snapshot each quarter of performance and data quality info to grantees; Give grantees the tools and information to improve performance and data quality
- **Audience**: CoC- and ESG-funded providers
- **Frequency:** Quarterly

Compliance Desk Monitoring Tools

- **Purpose:** Give CoC grantees the tools and information to be compliant with HUD and CoC requirements
- **Audience**: CoC-funded providers
- **Frequency**: Initial completion due in spring. Future completions TBD based on what level of support is needed.
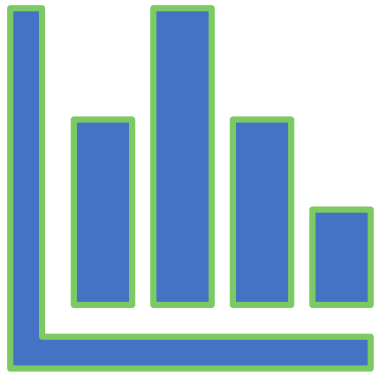
Data and Performance Monitoring Report

Data and Performance Monitoring Report

Each quarter, CoC and ESG grantees will receive a report of their project outcomes related to data quality and performance.

EASTERN PA COC QUARTERLY PERFORMANCE MONITORING REPORT: 10-01-2020 to 09-30-2021								

GENERAL PROJECT INFORMATION

Grantee Name:	Wayne County Human Services			Project ID #:		Grant # (CoC)/HMIS ID# (ESG):	
Project Name:	Wayne County Human Services ESG RRH Program			Project Type:	RRH	CoC or ESG?:	ESG

SUMMARY OF OUTCOMES

Number of upper thresholds met:	4	Number of lower thresholds met:	2	Number thresholds not met:	6

OUTCOMES REPORT

Criteria	Performance Outcome	Meets FY21 Threshold?	Meets or Exceeds FY20 SPM?	FY21 Upper Threshold ✔	FY21 Lower Threshold ❗	FY21 Does Not Meet Threshold ✖	Meet/ Exceed FY20 SPM ✔	Does Not Meet/Exceed FY20 SPM ✖
A. Data Quality Criteria								
1. Personally Identifiable Information	12.5%	✖ No		0%	N/A	> 0%		
2. Destination	7.7%	✖ No		0%	N/A	> 0%		
3. Income and Sources at Entry	0.0%	✔ Upper		0%	N/A	> 0%		
4. Income and Sources at Annual Assessment	50.0%	✖ No		0%	N/A	> 0%		
5. Income and Sources at Exit	5.0%	✖ No		0%	N/A	> 0%		
6. # of Adult Stayers Without Required Annual Assessment	0	✔ Upper		0	N/A	> 0		
7. Timeliness - Entries (% of records entered within 10 days)	90.9%	✖ No		100%	N/A	< 100%		
8. Timeliness - Exits (% of records exited within 10 days)	66.7%	✖ No		100%	N/A	< 100%		
B. Performance Criteria								
1. Increase Income - Any Source - % of adults	N/A	N/A	✔ Yes	50%+	20-49%	< 20%	>= 47%	< 47%
a. Increase Income-Earned - % adults	N/A		✔ Yes				>= 18%	< 18%
b. Increase Income-Non-Employment - % adults	N/A		✔ Yes				>= 33%	< 33%
2. Participants Connected to Mainstream Benefits - % adults w/1+ source(s)	N/A	N/A		70%+	40-69%	< 40%		
3. Participants Connected to Health Insurance - % of clients w/1+ source(s)	86.7%	❗ Lower		95%+	80%-94%	< 80%		
4. Average Length of Stay								

How is this different than CoC scoring?

CoC Scoring:

CoC scoring takes place annually and is a HUD requirement. HUD requires that CoCs evaluate the performance of CoC grantees, which informs the annual NOFO ranking.

VS

Quarterly Monitoring Process:

The performance monitoring process will take place quarterly. The goal is to give grantees the tools to identify potential issues and clean up data throughout the year. If the CoC sees consistent issues with a specific grantee, assistance can be provided as issues are identified. Similarly, if many grantees are struggling with a specific outcome, the CoC will be able to follow up and take appropriate action throughout the year.

Data and Performance Monitoring Report

Data Quality

Personally Identifiable Information (PII)

Destination

Income and Sources at Entry, Annual Assessment, and Exit

Adult Stayers Missing Annual Assessments

Timeliness – Entries and Exits

Data and Performance Monitoring Report

Performance

Increase Income (any Source) – Adults • Increase Earned Income • Increase Non-Earned Income (CoC-Funded Only)	Participants Connected to Mainstream Benefits – Adults (CoC-Funded Only)	Participants Connected to Health Insurance
Average Length of Stay (ES, TH, SSO, RRH)	Exit to Permanent Housing Destination (for PSH, this also includes clients who remain in PH)	Unit Utilization

Data and Performance Monitoring Report

Timeframe

- Quarterly reports will provide one year's data, each ending with the previous quarter. For example:
  - In January 2021, we will send you a report of your data from 10/01/2020-09/30/2021
  - In April 2021, we will send you a report of your data from 01/01/2021-12/31/2021
- Because the reporting time frames will overlap, you may see the same issues for a few quarters in a row. That's OK! The goal is that over time you will be able to see improvements if you are working to address issues with your data.

Data and Performance Monitoring Report

Thresholds

- Thresholds are shown to help you understand whether your project is currently meeting CoC expectations in terms of performance outcomes.
- Thresholds shown in the report reflect, for the most part, those used in the last CoC renewal project scoring process.
- Some criteria are different from those used in CoC scoring. Thresholds for those have been created based on general expectations.
- Thresholds are often adjusted over time, based on changes in performance or HUD/CoC expectations.

SPMs

- System Performance Measures (SPMs) data shown provides a CoC-wide average to compare against.
- The report currently shows the FFY20 SPMs data reported by each CoC. When the FFY21 SPMs have been submitted, the SPM data columns will be updated to reflect the updated data.

Data and Performance Monitoring Report

Expectations of grantees:

- Review the data and performance monitoring quarterly report each quarter, for each of your projects

- Make note of areas where you are doing well!

- Flag areas where improvement is needed and work with your team to make a plan for improvement

Data and Performance Monitoring Report

DV Providers:
- Because DV providers use a comparable database, we are unable to pull the data directly from HMIS.
- For 2022: If DV providers would like to utilize the data and performance monitoring tool, DV providers may submit their APRs or CAPERs from their comparable database on a quarterly basis to DMA. DMA will manually enter the data into the tool. DMA will send out a reminder each quarter about this.
- In the future: DV providers will most likely be required to submit their APRs or CAPERs to DMA as part of this process.

Data and Performance Monitoring Report

Preview:

Let's walk through the report!

Quarterly Monitoring – Using the Report

Carefully review the performance report.

The report will show you how your project is doing in comparison to the latest SPMs data and CoC renewal scoring thresholds.

Be sure to review the outcomes data and check to make sure it makes sense.

EASTERN PA COC QUARTERLY EVALUATION REPORT (DATA QUALITY AND PERFORMANCE)								
GENERAL PROJECT INFORMATION								
Grantee Name: Test Agency				Grant #: PA0000				
Project Name: Test Project				Project Type: PSH				
SUMMARY OF OUTCOMES								
Number of upper thresholds met: 6			Number of lower thresholds met: 2			Number thresholds not met: 5		
OUTCOMES REPORT								
Criteria	Performance Outcome	Meets FY21 Threshold?	Meets or Exceeds FY20 SPM? ✔	FY21 Upper Threshold	FY21 Lower Threshold !	FY21 Does Not Meet Threshold ✖	Meet/ Exceed FY20 SPM ✔	Does Not Meet/Exceed FY20 SPM ✖
1. Data Quality Criteria								
Personally Identifiable Information	0.00%	✔ Upper		0%	N/A	> 0%		
Destination	5.00%	✖ No		0%	N/A	> 0%		
Income and Sources at Entry	5.00%	✖ No		0%	N/A	> 0%		
Income and Sources at Annual Assessment	5.00%	✖ No		0%	N/A	> 0%		
Income and Sources at Exit	0.00%	✔ Upper		0%	N/A	> 0%		
Housing Move In Date (PSH and RRH Only)	0.00%	✔ Upper		0%	N/A	> 0%		
Timeliness - Entries (% of records entered within 10 days)	100.0%	✔ Upper		100%	N/A	< 100%		
Timeliness - Exits (% of records exited within 10 days)	100.0%	✔ Upper		100%	N/A	< 100%		
Performance Criteria								
Increase Income - Any Source - % of adults	65.0%	! Lower	✔ Yes	70%+	20-69%	< 20%	>= 47%	< 47%
Increase Income-Earned - % adults	25.0%		✔ Yes				>= 18%	< 18%
Increase Income-Non-Employment - % adults	60.0%		✔ Yes				>= 33%	< 33%
Participants Connected to Mainstream Benefits - % adults w/1+ source(s)	50.0%	✖ No		100%	90-99%	< 90%		
Participants Connected to Health Insurance - % of clients w/1+ source(s)	75.0%	✖ No		100%	90%-99%	< 90%		
Average Length of Stay								
TH/SSO - Average length of stay less than 365 days	N/A	N/A		<= 365 Days	N/A	> 365 Days		
ES - Average length of stay less than 30 days	N/A	N/A		<= 30 Days	N/A	> 30 Days		
Exit to PH Destination								
PSH ONLY - % of clients who remain or exit to PH	95.0%	! Lower	✖ No	100%	90-99%	< 90%	>= 96%	< 96%
RRH - % of clients who exit to PH	N/A	N/A	N/A	100%	85-99%	< 85%	>= 90%	< 90%
TH - % of clients who exit to PH	N/A	N/A	N/A	100%	85-99%	< 85%	>= 58%	< 58%
SSO - % of clients who exit to PH, ES or TH	N/A	N/A	N/A	100%	25-99%	< 25%		
ES - % of clients who exit to PH	N/A	N/A	N/A	47%	N/A	< 47%	>= 47%	< 47%
Unit Utilization (CoC Funded Projects only)								
Utilization Rate	100.0%	✔ Upper		100%	85%-99%	< 85%		

Quarterly Monitoring – Using the Report

Use the Monitoring Report to assess how your project is performing:

➡ Look out for the **X**s and **!**s
- ◦ **X** = you've missed the benchmark/threshold and wouldn't get points if you were being scored
- ◦ **!** = you've hit a lower benchmark/threshold but could improve, would only get partial points if scored
- ◦ Keep in mind that benchmarks are adjusted each year

➡ Check to make sure the data seems correct even when you see a ✓

➡ Compare reports from different time periods (once more become available) and note any unexpected changes

Quarterly Monitoring – Using the Report

➡ When you see **X**s and **!**s or an unexpected change, or a number that just seems incorrect (e.g., it's above 100% when that isn't possible) then review the project's data and ask questions:

- Does this data seem right?

- Is data missing or incomplete?

- Do you see an issue in the project's APR or CAPER report when you run it in PA HMIS?

- Are there possible data entry issues?

QUICK TIP:

None of the calculations should be over 100%. If they are, notify us!

Quarterly Monitoring – Using the Report

➡ Dig deeper into the individual client HMIS data where needed

- Be a data detective and ask questions: Are specific clients having issues? A subset of clients? Is there a pattern?
- Work with staff to determine what is going on and to make sure that data is being updated in HMIS.
- Assess whether you think you need help from the PA HMIS Team. If so, submit a ticket and track its progress. Remember that it may take time to address the issue.

Quarterly Monitoring – Using the Report

➡ The APR/CAPER Review report in HMIS is a great resource for digging deeper into your data. You can run the report for the same period as the monitoring tool and dig into individual measures (i.e., which clients are contributing to your data quality and performance measures).

➡ For example: You notice that your data quality is poor for destination and sources of income at exit. You can review the APR/CAPER review tool and see specifically which clients were missing this data. You can then go into HMIS and correct the missing data.

➡ DMA will provide instructions on running the APR/CAPER review report if needed.

Quarterly Monitoring – Using the Report

➡ Identify issues that require a larger strategy to address

- ◦ When you know the data is correct but your agency is struggling with performance issues, discuss the issues with agency staff to better understand the barriers and challenges the agency and/or clients are facing
- ◦ Connect with the RHAB, CoC staff or DMA to see if there are committees, strategies or resources that your agency can tap into to address those barriers and challenges

Quarterly Monitoring – Technical Assistance

If you think you need technical assistance related to your data:

- **If you have questions about your data, start by reviewing your APR or CAPER report in HMIS**
  - The APR/CAPER Report Viewer tool will let you drill down to your data at the client level, to see where issues may be happening
- **If you have questions related to HMIS issues** (you believe there is an error or issue with your data), submit an HMIS help desk ticket.
- **If you need help understanding the data, or identifying strategies for improvement,** email DMA (easterncoc@pennsylvaniacoc.org or westerncoc@pennsylvaniacoc.org)

Recap: Next Steps

Data and Performance Monitoring Report:

- DMA will send out the quarterly monitoring report to all CoC and ESG grantees by the end of January

- Review the data and performance monitoring quarterly report each quarter, for each of your projects

- Make note of areas you are doing well!

- Flag areas of improvement, and work with your team to make a plan for improvement
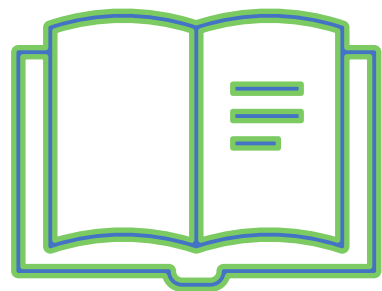
Questions?

Contact information:
easterncoc@pennsylvaniacoc.org OR
westerncoc@pennsylvaniacoc.org

Compliance Desk Monitoring Tools

COC GRANTEES ONLY

Compliance Desk Monitoring Tools

Purpose of Tools:

- Give CoC grantees the tools and information to be compliant with HUD and CoC requirements

What the tools cover:

- Regulatory/CoC Requirements (organization- and project-level tools)
- Fiscal Requirements (organization- and project-level tools)
- Client File Checklist

Compliance Desk Monitoring Tools

How it works:

- CoC grantees will complete the Desk Monitoring Tools as requested by DCED/DMA.
- For each item in the tool, check Yes (in compliance), No (not in compliance), or N/A (does not apply)
- For any items that are out of compliance, grantees should provide written comments explaining the circumstances and how you will remedy the issue.

Compliance Desk Monitoring Tools

How it works (continued):

- You may need to look in various places to answer each question (for example: policies and procedures, client files, fiscal records). There is a legend which indicates where you should look for each item.

- In order to complete the desk audit, you may need to consult with both program staff and fiscal staff within your organization.

- You are NOT required to complete the Client File Checklist and return to DCED/DMA. This checklist is provided as a reference for grantees when conducting internal client file reviews. DMA/DCED recommend that grantees review a portion of client files each quarter and review all client files at least annually.

Compliance Desk Monitoring Tools

Regulatory/CoC Requirements Monitoring Tools (organization- and project-level)

- Review HUD regulatory requirements and CoC requirements, including policies and procedures, record keeping, CoC standards, and project evaluation.
- One organization-level tool required per org. One project-level tool required per project.
  - E.g., if your organization has 4 CoC-funded projects, you will submit 1 organization-level tool and 4 project-level tools.

Fiscal Requirements Monitoring Tools (organization- and project-level)

- Review requirements related to fiscal policies and procedures, recordkeeping, internal controls, audits, allowable costs, match requirements, project income, limitation on use of funds, and procurement.
- One organization-level tool required per organization. One project-level tool required per project.
- The project-level tool looks long – however, not all of the sections will apply to your project.
  - E.g., if your project does not have leasing dollars you can skip that entire section.

Compliance Desk Monitoring Tools

This is intended to be an honest self-assessment (please don't just check yes for everything!).

HUD has many different regulations for the CoC program, and grantees may not be meeting all the requirements at this time.

We want this tool to be a resource for your agency to assess whether your agency/project is fully compliant and to avoid future HUD Monitoring or audit findings!

Compliance Desk Monitoring Tools

Regulatory/CoC Requirements Tools:
- CoC grantees will have 2 months to complete the organization- and project-level Regulatory/CoC Requirements Tools and submit to DMA
- **Due by March 31, 2022**
- Upon completion, grantees will complete a mandatory survey that asks about findings and next steps

Fiscal Requirements Tools:
- Grantees will have an additional 3 months to complete the organization- and project-level Fiscal Requirements Tools
- **Due by June 30, 2021**
- Upon completion, grantees will complete a mandatory survey that asks about findings and next steps

Compliance Desk Monitoring Tools

What happens after you submit the tool?

- Grantees are asked to resolve any identified issues **by August 31, 2022.**

- DMA will review submitted tools and surveys. DMA will make note of issues that may need CoC-wide training.

- DMA is available to provide TA to grantees to resolve issues. Some issues may require your agency to work with the project's HUD Rep to address.

Compliance Desk Monitoring Tools

Preview:

Let's walk through the tools!

Recap: Next Steps

Compliance Desk Monitoring Tools:

- DMA will send out the tools to CoC grantees

- CoC grantees will have 2 months to complete the organization- and project-level Regulatory/CoC Requirements Tools (**due by March 31, 2022**). Grantees will submit the tools, along with a mandatory survey that asks about findings and next steps, via Alchemer.

    - Each org should submit 1 organization-level tool, as well as one project-level tool for each project (e.g., if your org operates 4 CoC-funded projects, you will submit 1 organization-level tool and 4 project-level tools).

- Grantees will have an additional 3 months to complete the organization- and project-level Fiscal Requirements tools (**due by June 30, 2022**). Grantees will submit the tool, along with a mandatory survey that asks about findings and next steps, via Alchemer.

- Address/resolve findings by **August 31, 2022**.

Questions?

CONTACT INFORMATION: EASTERNCOC@PENNSYLVANIACOC.ORG OR WESTERNCOC@PENNSYLVANIACOC.ORG