



# Monitoring



# Levels of Monitoring

Recipient Self Monitoring and Subrecipient Monitoring

Continuum of Care Monitoring

HUD Risk Analysis and Monitoring



## Recipient – Self Monitoring

Required to comply with 2 CFR§200.303 Internal Controls requirements ensuring:

- Effective and efficient operations
- Reliability of reporting
- Compliance with applicable laws and regulations
- At a minimum:
  - Policy and procedure review
  - Participant file review
  - Expenditure review



# Subrecipient Monitoring

- Required annually
- Review for:
  1. Compliance with CoC program regulations
  2. Consistency with CoC written standards for providing CoC assistance
  3. Match is received, documented, and used for eligible costs
  4. Recordkeeping
- Document non-compliance and provide corrective measures



## Continuum of Care Monitoring

Continuums of Care are required to:

- Establish performance targets by program type
- Monitor recipient and subrecipient performance
- Evaluate outcomes
- Take action against poor performers

**\*\*Performance impacts your score on the NOFA\*\***



## HUD Monitoring

- Required by Office of Budget and Management
- Purpose – To determine that grant activities are implemented in compliance with:
  - CoC Program interim rule
  - NOFA
  - Grant agreement
  - Omni circular and other programmatic guidance
- Help recipients improve their performance
- Review can be remote or on-site



## Risk Analysis

### Risk Factors:

- Grant Management – reporting, staff capacity, multiple programs, findings, sanctions
- Financial Management – fiscal capacity, timeliness, audits
- Services and Satisfaction – complaints and response, progress and meeting objectives
- Physical Assets – owned or leased units, multiple sites, number of units



## Ranking and Notification

- Ranked based on risk score
- Work plan is created
- Recipient receives written notification 15 days prior to monitoring
- Written notification includes the exhibits to be used

CPD Monitoring Handbook

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





# Monitoring Areas

Program  
Participants

Program  
Components

Eligible Costs

Project Progress

Match  
Documentation

Subrecipient  
Management

Recipient  
Management

Financial  
Management

Cost Allowability

Procurement

Equipment and  
Equipment  
Disposition

Other Federal  
Requirements



## Preparing for a Monitoring

- Conduct a “mock” monitoring
- Prepare all documentation
- Have staff on stand-by
- Prepare your office space



## The Monitoring Visit

- Entrance conference
- Review of participant files, financial documents, staff interviews, participant interviews
- Site visit to view units
- Exit conference
- Monitoring report
- Recipient response
- Clearance of findings



# Common Findings

# Most Common Findings

## **Program:**

- Lack of intake policies and eligibility documentation
- Lack of supportive services documentation
- Rent and lease compliance
- Rent reasonableness

## **Finance:**

- Incorrect classification of costs
- Insufficient match documentation
- Lack of internal controls over voucher draws



# Most Common Findings

## **Cross-Cutting:**

- Lead Based Paint

## **Fair Housing:**

- Lack of affirmative marketing strategy
- Lack of affirmative marketing





## Program Findings

### **Finding:**

- Lack of intake policies and eligibility recordkeeping

### **Corrective Action:**

- Agency P&P that include order of priority for documenting homelessness and steps to admit and collect eligibility



## Program Findings

### **Finding:**

- Lack of supportive services documentation

### **Corrective Action:**

- Case notes document participant visits or effort of CM to make contact





## Program Findings

### **Finding:**

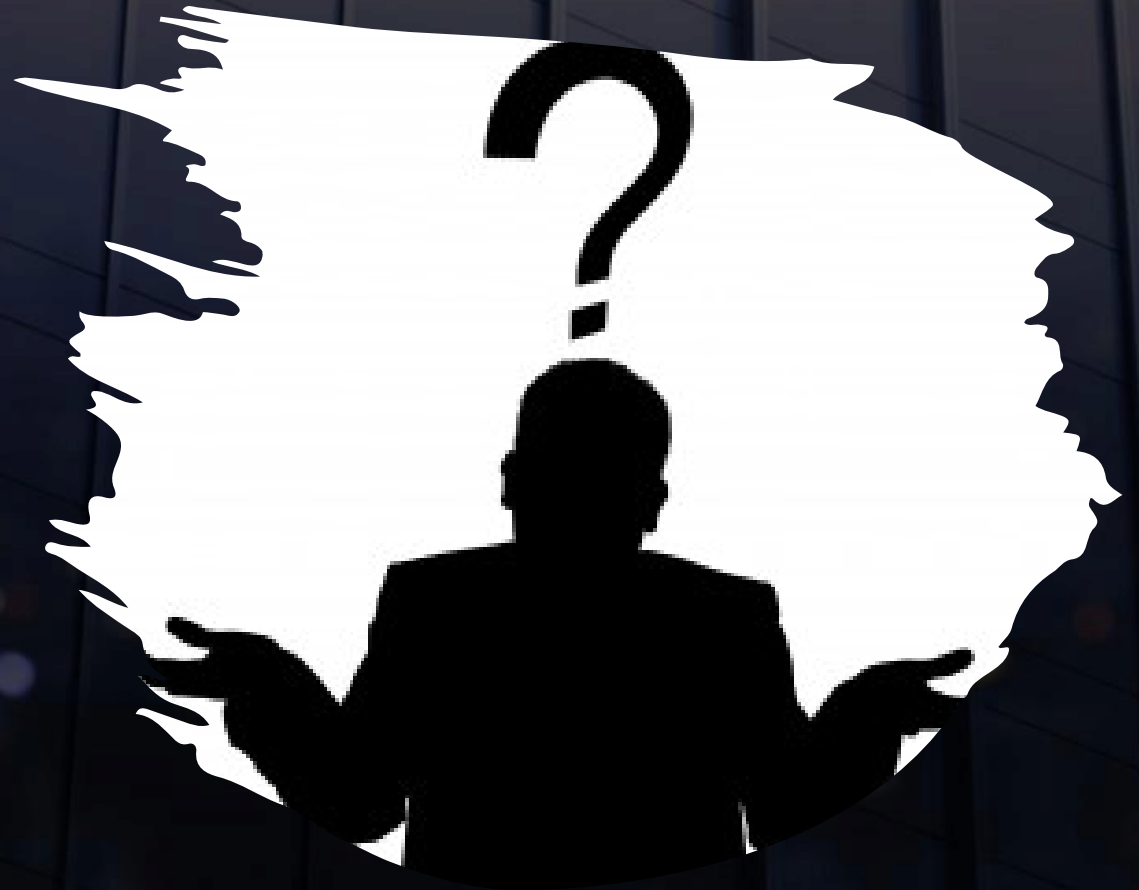
- Rent and lease compliance

### **Corrective Action:**

- Maintain leases on file, with documentation of rent calculation, FMR and rent reasonableness

# “We didn’t know that was required...”

- Children of opposite genders should not share a room, unless very young [578.75(c)]
- Consider educational needs of children when placing families; coordinate with children’s services [578.23(c)(7)]
- Homeless participation in policy making [578.75(g)]
- FFATA reporting of subrecipients [578.99(c)]



# Best Practices

- Create standardized forms for intake, homeless and disability verification, rent calculation and rent reasonableness
- Create a file checklist to be completed as participants are admitted and documentation is collected
- Institute a file review process by case management supervisor or other manager within a specified period after new participants are admitted
- Review agency policies and procedures against CoC program standards and CoC program regulations for completeness
- When in doubt, contact your CPD Rep

# Common Financial Findings

- Staff time must be supported with timesheets, documented by grant and budget line item 2 CFR 200.430(i)
- Timesheets signed by supervisor
- Expenditures must have supporting documentation (purchase authorization, bill, invoice, timesheet)
- Not tracking expenses by budget line item
- Match expenditure documented in financial records
- PI (tenant share of leasing projects) documented



# Financial Findings

## **Finding:**

- Misclassification of costs (admin costs as operating common) – Case management supervisor time is an administrative cost

## **Corrective Action:**

- Review the questioned costs, correctly classify them in your accounting records and work with your CPD Representative to correct LOCCS.



# Financial Findings

## **Finding:**

- Insufficient match documentation

## **Corrective Action**

- Track staff time working with CoC participants but paid from other sources
- Maintain a match log for in-kind donation of goods
- Require tracking and reporting of in-kind services in MOU with service provider
- Cash match used for CoC program costs must be clearly documented as such



# Financial Findings

## **Finding:**

- Incorrect identification of Federal Awards in financial management system

## **Corrective Action**

Update accounting records to include:

- CFDA title and number
- HUD grant number
- Year of award
- HUD's agency name as awarding agency



# Financial Findings

## **Finding:**

- Timesheets and accounting for staff time

## **Corrective Action**

- Charge staff time based on actual hours worked, not percentages
- Account for time by activity (supportive services or operating)
- Supervisor signs timesheet





# Best Practices

- Maintain written policies and procedures for financial transactions
- Conduct a regular review of expenditures to budgeted amounts
- Conduct a review for eligibility before approval of costs
- Collect quarterly reports from in-kind service providers
- When in doubt, contact your CPD Representative

# Lead Based Paint Findings



## **Finding:**

- Lack of documentation of assessment for exemption from lead-based paint requirements and/or visual assessment

## **Corrective Action**

- Create policies and procedures for LBP review, and create a single document to assess for exemption and visual assessment

# Lead Based Paint Findings



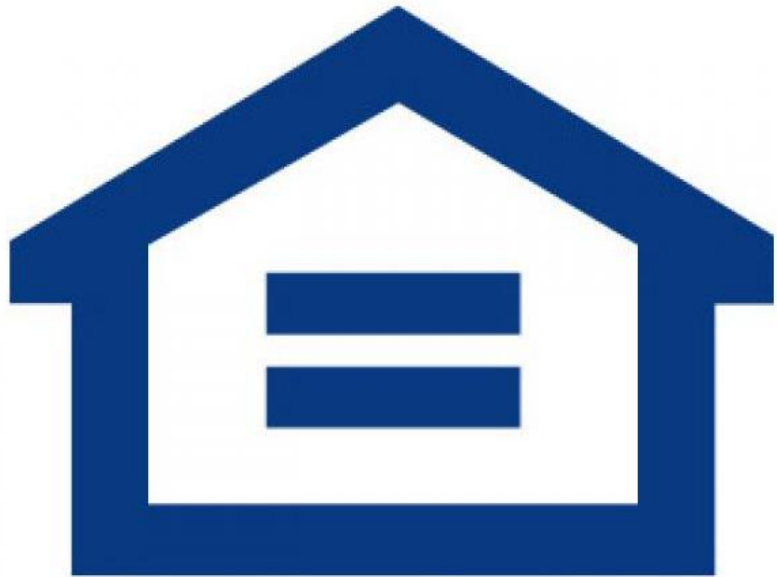
## **Finding:**

- Failure to request/report units receiving assistance to the public health department

## **Corrective Action:**

- At least quarterly, report the addresses of units receiving rental assistance to the public health department to cross-check for children with elevated blood lead levels

# Fair Housing Findings



**EQUAL HOUSING  
OPPORTUNITY**

## **Finding:**

- Failure to examine those least likely to apply to the program and create a plan to outreach to those demographics

## **Corrective Action:**

- Create an affirmative marketing plan that includes specific data and demographics and measurable activities to be undertaken to outreach and market to those least likely to apply

# Fair Housing Findings



## **Finding:**

- Failure to follow the outreach outlined in the affirmative marketing plan and/or document the outreach efforts

## **Corrective Action:**

- On-going outreach and documentation of each effort

# Fair Housing and Equal Opportunity

- Non-discrimination and equal opportunity
- Affirmative marketing
- Report activity that impedes fair housing choice
- Provide housing and services in an integrated setting



**EQUAL HOUSING  
OPPORTUNITY**

## Conflicts of Interest

### Organizational conflict

- Recipient/subrecipient is unable to render impartial assistance in the provision of any type or amount of assistance
- Objectivity in performing work might be otherwise impaired

### Other conflicts

- No covered person, may obtain a financial interest or benefit from an assisted activity



## HUD Exchange Resources

- [HUD Exchange Website Home Page](#)
- [CoC Program Page](#)
- [CoC Program Toolkit Page](#)
- [Frequently Asked Questions – CoC Program](#)
- [Ask A Question](#) on HUD Exchange
- [Join a Mailing List](#) on HUD Exchange
- [CoC GIS Tools](#)



The background of the slide is a low-angle shot of a modern building's glass facade at dusk or night. The glass panels are dark blue and reflect the sky and some blurred city lights. A large, thin, light-blue circle is centered on the page, framing the text. There are four solid circles of different colors: a white one in the upper left, a yellow one just above it, an orange one in the lower right, and a small red one in the lower left.

# HUD Systems



## Knowing where to go



- eSnaps – CoC grant application and project applications
- Line of Credit Control System (eLOCCS) – Drawing grant funds
- Sage HMIS Reporting Repository – Annual Performance Report (APR)


















# Finding eSnaps

Resources and assistance to support HUD's community partners

**NEED HOUSING ASSISTANCE?** [Email Updates](#) [Log In](#)

 **HUD EXCHANGE** [Programs](#) [Resources](#) [Trainings](#) [Program Support](#) [Grantees](#) [News](#) 

## Programs & Related Topics

 <a href="#">Acquisition and Relocation</a>	 <a href="#">Environmental Review</a>	 <a href="#">DRGR</a> <a href="#">Log In</a>
 <a href="#">CDBG Program</a>	 <a href="#">HOME Program</a>	 <a href="#">e-snaps</a> <a href="#">Log In</a>
 <a href="#">Consolidated Planning</a>	 <a href="#">HOPWA Program</a>	 <a href="#">Housing Counseling System</a> <a href="#">Log In</a>
 <a href="#">Continuum of Care Program</a>	 <a href="#">Housing Counseling Program</a>	 <a href="#">IDIS</a> <a href="#">Log In</a>
 <a href="#">Emergency Solutions Grants Program</a>	 <a href="#">Public Housing and Voucher Programs</a>	 <a href="#">Sage</a> <a href="#">Log In</a>

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# eSnaps

 Front Office


Front Office Portal

Username:

Password:

Login

[Forgot your password?](#)

 [Create Profile](#)

 [Contact Us](#)

## Welcome to e-snaps

Welcome to ***E-snaps!*** ***E-snaps*** is the application and grants management system for the HUD Continuum of Care (CoC) Program. It supports the collaborative application process known as the CoC Program Competition.

The ***E-snaps*** system is to be used by authorized persons only. If you are an authorized user, please log in by entering a valid user name and password. If you have any difficulty with this process please contact the System Administrator. You may also use the Links on the left menu to navigate through the system, and access application forms and other related links. If you need assistance in navigating the system please access the Help instructions in each section.

If you are not yet an authorized user, and need access to this system on behalf of your Continuum of Care or as a project applicant, you may request a user name through the Registration process.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Selection of applications for funding under the Continuum of Care Program are based on rating factors listed in the Notice of Fund Availability (NOFA), which is published each year to announce the Continuum of Care Program funding round. The information collected in the application form will only be collected for specific funding competitions.

### CoC Program Registration:

OMB Approval No. 2506-0182 (exp. 02/28/2022)

Public reporting burden for this collection is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

### CoC Program Application:

OMB Approval 2506-0112 (exp. 02/28/2022)

Public reporting burden for this collection of information is estimated to average 190 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The reporting burden for Continuums of Care is estimated to average 204 hours and the reporting burden for applicants is expected to average 30 hours.



## Getting Started

- Create an eSnaps user profile
- Obtain access to your agency's eSnaps account
- Update the agency's Applicant Profile

<https://www.hudexchange.info/resource/2903/adding-deleting-registrants-in-esnaps/>



# Navigating eSnaps

- Navigation from the left menu bar
- Do not use browser navigation buttons

The screenshot shows the 'Front Office' web application. The top navigation bar includes the 'Front Office' logo, a user profile for 'tester1', and links for 'Logout' and 'Help'. A left-hand menu bar contains options such as 'Front Office Portal', 'Browse Funding Opportunities', 'Profile', 'My Account', 'Change Password', 'Workspace', 'Applicants', 'Funding Opportunity Registrations', 'Projects', 'Submissions', and 'Contact Us'. The main content area displays the 'Applicant' dropdown set to 'SNAPS TESTING INDIVIDUAL (92066145)'. Below this, the 'Applicant Details' section shows 'Applicant Name: SNAPS TESTING INDIVIDUAL' and 'Applicant Number: 92066145'. A 'Registrants' table is shown with one entry:

Name	User Name	Email	Group
tester1, snaps	tester1	snaps tester1@nodomainname.gov	Administrator

A 'Back to List' button is located below the table. The footer of the page shows 'Page Generation Time: 1.197s' and the 'Grantium' logo.



# Navigating eSnaps

Left menu bar link	What you can do...	How to do it...
Applicants	Access the Applicant Profile (CoC or Project Applicant)	Select the "Folder" icon (orange folder)
	Add registrants in e-snaps (i.e., add staff so they can access the organization's <i>e-snaps</i> account)	Select the "Registrant" icon (looks like a person)
	View applicant details (e.g., organization name, number, and type)	Select the applicant name
	Add an applicant (either the CoC as an applicant or the project applicant organization as an applicant)  !! Use this one time only the first time you set up your organization in <i>e-snaps</i> as an applicant and create the Applicant Profile.	Select the "Add" icon



# Navigating eSnaps

Funding Opportunity Registration	<p>Use this link one time only during each CoC Program competition.</p> <ul style="list-style-type: none"><li>• CoCs register for the funding opportunity during CoC Registration period.</li><li>• Project Applicants register for the funding opportunity during the CoC Program Competition period.</li></ul>	Select the “Register” icon (piece of paper with a check mark)
Projects	Create a project	Select the “Add” icon
	View project details (e.g., revise a project’s name and/or add notes describing the project)	Select the “View” icon (magnifying glass)
Submissions	<p>For the CoC: Access CoC Registration, Consolidated CoC Application, Project Priority Listing</p> <p>For the project applicant: Access the Project Application</p>	Select the “Folder” icon (orange folder)





## eSnaps Useful Guide

- Recipient Post Award User Guide
- Recipient Amendments Instructions

<https://www.hudexchange.info/resource/2915/esnaps-features-and-functions/>



## Accessing eLOCCS

- Register agency in Secure Systems (new recipients)
- Register Approving Official/Coordinator for user ID
- Register User(s) for user ID
- Approving Official assigns the User role in Secure Systems
- User(s) submits 27054e - eLOCCS Access Authorization Form to CPD Representative
- CPD Representative submits form to LOCCS Security Office



# eLOCCS Registration Guide

- In-depth instructions can be found on HUD.gov  
Registration Guide

<https://www.hud.gov/sites/dfiles/CFO/documents/eLOCCS%20Registration%20Guide%20February%202018.doc>



## Additional Guidance

### Step by Step Instructions:

- Registering in Secure Systems
- Completing the 27054e Form
- Change of address
- Terminating Users
- Changing Approving Officials
- SF 1199A instructions

[https://www.hud.gov/program\\_offices/cfo/loccs\\_guidelines#1](https://www.hud.gov/program_offices/cfo/loccs_guidelines#1)



## Important Reminders

- DO NOT SHARE USER IDS
- Approving Officials and Users log in at least once every 60 days to maintain access
- Secure Systems password reset on log-in page
- Approving Official must recertify users every six months
- Reinstate User ID for LOCCS requires a new 27054e to reinstate User access



# Troubleshooting – No LOCCS in Systems Menu

- Coordinator goes into Systems Administration – User Maintenance
- Search by Name or User ID
- Choose a Function – Maintain User Roles
- Check ADM and QRY, then click Assign/Unassign button

**Main Menu** mail | help | search | ho

## Systems

- [Financial Assessment Submission - PHA \(FASPHA\)](#)
- [Financial Assessment Subsystem - Multifamily Housing\(FASSUB\)](#)
- [Lender Assessment Subsystem \(LASS\)](#)
- [Line of Credit Control System \(LOCCS\)](#)
- [Management Assessment Subsystem \(MASS\)](#)
- [Physical Assessment Subsystem \(PASS\)](#)
- [Public Housing Assessment System: Scores and Status \(NASS\)](#)
- [Real Estate Management System \(REMS\)](#)
- [Resident Assessment Subsystem \(RASS\)](#)
- [Tenant Assessment Subsystem \(TASS\)](#)
- [Unique IPA Identifier \(UII\) Registration System \(QASS\)](#)

User ID	<input type="text"/>
First Name	<input type="text"/>
Middle Initial	<input type="text"/>
Last Name	<input type="text"/>
User Status	Active
Coordinator	Yes
User Type	PHA User/Business Partner

Please check/uncheck boxes to assign/unassign roles to the user

<b>FASPHA - Financial assessment subsystem - PHA</b>	
<input checked="" type="checkbox"/>	CPV - CPA Verification
<input checked="" type="checkbox"/>	FIA - PHA Analyst
<input checked="" type="checkbox"/>	PID - PHA Director
<input checked="" type="checkbox"/>	SMT - PHA Submitter
<b>LOCCS - Line of Credit Control System</b>	
<input checked="" type="checkbox"/>	ADM - Administration
<input checked="" type="checkbox"/>	QRY - Query
<input type="checkbox"/>	REQ - Requisition
<input type="checkbox"/>	YES - Year End Settlement



# Troubleshooting – Can't Log In Secure Systems

✓ Active ✗ Terminated

Secure Systems	LOCCS Status	User	Effective Date	Signon Count	Last Access	Last Certified	
✓	✓	<b>Approving Official: <a href="#">MATTHEW SUTTON</a></b>					
✓	✓	<a href="#">AMY CLARK</a>	08-26-2013	241	03-08-2021	08-24-2020	<a href="#">eLOCCS</a>
✓	✓	<a href="#">CRYSTAL FLECK</a>	12-10-2020	8	03-01-2021		<a href="#">eLOCCS</a>
✗	✓	<a href="#">MELINDA YOUNG</a>	09-13-2005	264	10-28-2020	08-24-2020	<a href="#">eLOCCS</a>

- Melinda has not logged into Secure Systems within a 60-day period
- Melinda should contact REAC to be reinstated 888-245-4860

# Troubleshooting – Can't Log In LOCCS



Active	Terminated						
Secure Systems	LOCCS Status	User	Effective Date	Signon Count	Last Access	Last Certified	
✓	✓	<b>Approving Official: <a href="#">MATTHEW SUTTON</a></b>					
✓	✓	<a href="#">AMY CLARK</a>	08-26-2013	241	03-08-2021	08-24-2020	<a href="#">eLOCCS</a>
✓	✓	<a href="#">CRYSTAL FLECK</a>	12-10-2020	8	03-01-2021		<a href="#">eLOCCS</a>
✓	X	<a href="#">MELINDA YOUNG</a>	09-13-2005	264	10-28-2020	08-24-2020	<a href="#">eLOCCS</a>

- Melinda has not logged into LOCCS within a 90-day period
- Melinda must complete a 27054e and select Reinstate User
- After her supervisor signs and it is notarized, she should send it to her Rep via encrypted email





## Direct Deposit SF – 1199A

- Required for new recipients to connect banking information with LOCCS
- Section 3 completed by financial institution
- Must be submitted with a voided blank check
- Submit to [FWAC-sf1199a@hud.gov](mailto:FWAC-sf1199a@hud.gov)

Additional instructions – bottom of the page

[https://www.hud.gov/program\\_offices/cfo/loccs\\_guidelines#1](https://www.hud.gov/program_offices/cfo/loccs_guidelines#1)



## Sage HMIS Reporting Repository

- Annual Performance Report (APR) due 90 days after the end of the grant operating year
- Sage system allows recipients to submit data from HMIS or comparable system
- Grant information populated from applications in eSnaps and LOCCS



## Accessing Sage

- New user create an account link on the sage homepage
- Registration will be approved by the CoC primary contact

<https://www.sagehmis.info/logon.aspx>

CoC APR Guidebook available

<https://files.hudexchange.info/resources/documents/sage-coc-apr-guidebook-for-coc-grant-funded-programs.pdf>



## Sage Best Practices

- Complete the final draw in LOCCS prior to submitting the APR in Sage
- Run a test report and review for any structural or validation errors
- Review expenditures by budget line item compared to funds drawn in LOCCS by budget line item
- Add comments if your outcomes differ from what was proposed in the approved application