

# Louisiana Shelter Plus Care PSH Program Monitoring Plan

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## INTRODUCTION

Program evaluation and monitoring is the mechanism by which the Office of Community Development (OCD) provides administrative oversight to the five S+C Subsidy Administrators (SA). It is the keystone to the success of the State's S+C PSH Program. As the S+C grantee with HUD, OC staff has the responsibility to ensure that the SAs carry out their programs in accordance with all applicable laws and regulations. In carrying out this responsibility, OCD staff will help each SA identify problems early in program implementation, identify the causes and assist in correcting these problems. OCD staff will conduct all monitoring activities in a positive, assistance-oriented manner and when feasible, deficiencies should be corrected on-site through technical assistance from either OCD staff or TA providers. However, in cases where major performance and compliance problems are identified, OCD staff will seriously analyze those problems and their causes prior to making recommendations to the Subsidy Administrator. It is the responsibility of the OCD staff to ensure that the SA is following the policies and procedures specified in the LA Shelter Plus Care Policies and Procedures Manual as well as the the SA's S+C Policies and Procedures.

### I. OBJECTIVES

The objectives of the OCD staff in monitoring are to determine if Subsidy Administrators (SA) are:

- a. Carrying out their S+C programs as approved in their application, addendums as well as the Cooperative Agreement;
- b. Complying with all applicable federal and state regulations;
- c. Carrying out their programs in accordance with the most current implementation schedule;
- d. Demonstrating a continuing capacity to carry out the approved S+C rental assistance program; and,
- e. Requesting reimbursement only for approved S+C costs.

### II. THE ROLE OF LA OFFICE OF COMMUNITY DEVELOPMENT

Since OCD will be the primary contact with the SA, OCD's role in fostering a cooperative relationship is critical. Unlike HUD, which has specialists as well as representatives, the State has mostly generalist staff, with a few who serve as technical specialists. OCD's program staff will be responsible for oversight, problem identification, problem resolution, and grantee relations. In order to fulfill this responsibility, OCD must develop a working knowledge of the overall state and federal program regulations, a detailed knowledge of each SA's program, and knowledge of the data resources and human resources available from support OCD staff and outside consultants. It will require cooperation with other staff and a willingness to learn from those more experienced and knowledgeable. Regarding the administration and operation of the LA's S+C PSH Program, OCD will coordinate the provision of all specialized technical

assistance to the SAs from both the Technical Assistance Collaborative, Inc. as well as HUD-funded TA provider(s).

### III. GENERAL APPROACH TO PROGRAM MONITORING AND EVALUATION

Program monitoring and evaluation consists of three major functions:

- Education and Individual TA
- Ongoing evaluation and assistance
- On-site assistance

Education is the provision of the workshops, manuals, and policy updates (through periodic amendments to the S+C Policies and Procedures Manual) that provide guidance to the SAs regarding how to administer their respective S+C Programs. OCD's primary educational efforts are the S+C Policies and Procedures Manual and periodic training workshops sponsored by OCD. In addition, OCD will coordinate, to the extent possible, individualized TA to a SA as needed to assist with any operational challenges. This individualized TA will come from a variety of sources to include OCD staff support and assistance from HUD-funded subject matter experts.

On-going evaluation and assistance is the systematic process used to maintain contact with all recipients in order to track their progress, make comparisons between and among SAs (to the extent possible), and identify "slow performing" SAs for early contact and assistance.

On-site assistance is that which is actually provided at the location of each SA. It includes, among other things, monitoring and the provision of technical assistance. This function is the one most critical to effective program implementation since it is during those visits that most major problems are discovered. Education and ongoing assistance essentially support this effort and often prevent the major problem just discussed from developing.

#### A. Education and Training

Through input from the S+C Advisory Committee, OCD will update the LA S+C Policies and Procedures Manual periodically notifying SAs in a timely basis on any changes. The Office of Community Development will conduct periodic training workshops for SA staff on OCD's S+C Policies and Procedures as well as basic S+C regulations. OCD will also develop training sessions for the SAs as training needs are identified.

#### B. Ongoing Evaluation and Assistance

Ongoing evaluation and assistance is the primary means of tracking SA performance/compliance on a day to day basis, determining the need for technical assistance, obtaining data to plan for the routine site visits, and determining the need for exception site visits. In keeping with the objective of minimizing monitoring burdens for the SAs, OCD utilizes, to the extent possible, existing data that is routinely submitted for other purposes. The following are examples of data sources which are utilized:

- SA's Application and Addenda
- Implementation Schedule
- SA's Cooperative Endeavor Agreement
- S+C Funds Requisition Request
- SA Quarterly and Annual Reports (QPR and APR)

The first ongoing evaluation activity is to examine the recipient's implementation schedule, approved application, and cooperative endeavor agreement. All activities included on the schedule should be consistent with the approved application and the time period indicated should be reasonable. Any discrepancies must be resolved with the SA. OCD will also note any additional conditions established in the SA's cooperative endeavor agreement. OCD will continually monitor and assess the SA's progress in achieving its leasing goals established in their approved implementation schedule.

Each S+C Funds Requisition Request submitted by the SA indicates the budget line item for which the draw is being made. OCD staff will monitor the SA's requisition and reconciliation activity tracking the SA's performance in completing its program activities.

Other sources for charting the SA's performance include:

- Change in activities due to program amendments and budget revisions;
- Changes in funds budgeted due to program amendments;
- Budget revisions; and
- Changes in leasing goals due to a revised implementation schedule.

OCD requires that each SA maintain the S+C Grant Monitoring Workbook in order to track both S+C occupancy levels as well as the expenditure of S+C grant funds. OCD will be available to provide training to SA staff in order to utilize the S+C Grant Monitoring Workbook effectively. The S+C Grant Monitoring Workbook should be used as a tool by each SA to determine the following:

- Cumulative draw requests should be compared with funds budgeted to make sure the amount drawn does not exceed the budgeted amount without appropriate changes. Periodically the program schedule contained in the cooperative endeavor agreement should be checked;
- Whenever appropriate, the SA should request a revised implementation schedule. A revised schedule must also be obtained from the SA when a amendment to the cooperative endeavor agreement is approved.

OCD will monitor the SA's performance in maintaining the S+C Grant Monitoring Workbook and will use it to evaluate the SA's performance in both accomplishing its leasing goals per the approved implementation schedule. The procedures will be used to evaluate a recipient's on-going performance and will be used to determine whether an exception site visit is warranted.

OCD will also conduct periodic reviews and quality assurance of HQS inspections by each SA. OCD will contract with a representative to inspect and verify that the housing units meet HQS. OCD will identify a random sampling of units in each SA's program to inspect. These HQS inspections may or may not correspond to an OCD site visit. However, OCD will address any issues or findings regarding these HQS inspections during the next on-site monitoring visit.

### C. On-Site Monitoring

The OCD is committed to substantial on-site compliance assistance. This includes reviews of grantee performance and compliance as well as the provision of technical assistance to facilitate the correction of any problems identified during on-site reviews.

OCD staff monitors the following areas which include but are not limited to:

- Program Progress;
- Compliance with S+C regulations and policies established by OCD;
- General organization of program files;
- General organization of participant files;
- Maintaining the S+C Grant Monitoring Workbook (in order to track expense of funds on rent and admin, participants in housing and participant's conductive housing search;
- Rent Reasonableness Reviews being conducted properly;
- Tenant Rent Calculation being conducted properly;
- Financial and general contract management (including the monthly drawdown and reconciliation process;
- Fair housing/equal employment opportunity requirements;
- Environmental review;
- Verification that HQS Inspections are being conducted timely;
- Verification of landlord's receipt of rent payment; and
- Local complaint and termination policies and procedures.

#### 1. Criteria for Site Visits

There are two types of on-site monitoring visits: exception and regularly scheduled.

Exception visits are those visits triggered by apparent problems indicated by on-going monitoring data and telephone conversations. OCD staff is responsible for contacting "slow-performing" SAs. Responses which indicate there may be a serious problem in performance should trigger an exception visit.

Regularly scheduled visits are those scheduled during the course of the year for normal oversight and compliance assistance. OCD staff will schedule a quarterly monitoring visit with the SA.

Over time, OCD reserves the right to conduct less frequently with a SA based on performance and progress in meeting their implementation goals.

## 2. Scheduling the Site Visit

When a SA has been identified for a site visit, exception or regular, OCD staff will contact the SA to schedule the visit. The call to schedule the site visit is important in setting the tone of the subsequent visit.

If it is a regularly scheduled visit, ask the recipient if he/she has or if he/she foresees any problems you might help him/her with while you are on-site. Tell him/her the visit will require approximately one day and you will want to talk to the people carrying out the program as well as review program files and visit the project-based or sponsor-based site. Once the monitoring visit has been scheduled, an email or letter confirming the date will be prepared and sent to the SA. OCD staff may also schedule a conference call prior to the site visit to review the scope of the visit with the SA. At this time, OCD staff will also share the S+C monitoring worksheet and encourage the SA to utilize the worksheet in order to prepare for the site visit.

## 3. Pre-Site Visit Actions

After the letter confirming the site visit has been sent, OCD staff will prepare the materials for the visit. Prior to the site visit, OCD will review recent QPRs and APRs, recent Requisitions and the most recent updates to the S+C Monitoring Workbook.

## 4. Conducting the Site Visit

OCD staff members are representatives of the State during these visits to the SA. The purpose of the site visit is to determine how the SA is progressing in operating its S+C program, to identify any problem areas, and to assist the SA to correct the identified problems.

### a. Entrance Interview

OCD staff will introduce himself/herself and explain the purpose of the visit. At this point it is often useful to let the recipient talk a little about the program, identify any problems he/she is having, and receive feedback about the program's policies and procedures. The entrance interview should be brief (approximately 30 minutes).

### b. Review of S+C Participant Files

The SA shall maintain proper participant files. As part of the monitoring visit, OCD will review a random sample of participant files to ensure that proper documentation is being collected and maintained. A standard rule of thumb would be OCD randomly selecting 10% of the participants currently in the program.

OCD staff will consider adding more files to the sample size in order to: include a file or files

from each SA staff person working in the respective program area being monitored; expand the sample, if necessary, to include additional files with the same characteristics, if indicated by the severity or nature of any problems(s) noted during the initial selection's review (for example, same problem category, same staff person, same activities or other characteristics). This expanded sampling aids in determining whether problems are isolated events or represent a systemic problem. OCD staff may also add files to the selection from any project that the OCD staff has reason to believe may have compliance problems or that is substantially different in terms of size, complexity, or other factors from other projects the grantee has funded.

The SA shall maintain the following properly completed forms in a participant's file:

- Shelter Plus Care Application,
- Homeless, Income, Disability Eligibility (for all S+C participants),
- Chronic Homeless Eligibility (when necessary),
- Verification of PSH eligibility (documentation from the LLA),
- Appropriate Backup Documentation to establish S+C eligibility,
- Release of Information Form,
- S+C Occupancy Agreement (Participant and Landlord),
- S+C Participation Agreement (Participant and SA or S+C Sponsor)
- S+C Rental Assistance Agreement (SA or Sponsor and Landlord),
- HUD Housing Quality Standard (HQS) Inspection Form,
- HUD Resident Rent Calculation Form,
- Rent Reasonableness Review Forms, and
- Other Forms as specified by OCD

In addition, the SA shall also have access to Individual Housing Support Plan (IHSP) to be developed and maintained by the LLA's Housing Support Team(s).

If issues are identified during the review, the SA with OCD staff support will attempt to correct them on-site. Many issues encountered will be relatively minor and can be corrected while on-site. This should be done whenever possible. When the issue cannot be remedied completely on-site, OCD staff will explain the steps needed to correct the issue should to the SA.

c. Completing S+C Monitoring Worksheet and HMIS

OCD recognizes that it is critical to have systems in place to track the utilization of grant funds – including those funds used for rental assistance as well as administration and other rent-related activities – as well as the number of homeless disabled people served. During the site visit, OCD staff will review and verify the SA's S+C Grant Monitoring Workbook to insure that the SA is effectively tracking both S+C occupancy levels as well as the expenditure of S+C grant funds.

OCD requires the SAs enter S+C client data into the local HMIS on a continual basis. The SA will establish systems to collect all required HMIS data from S+C participants and enter data into the HMIS system on a timely basis. During the site visit, OCD staff will verify that data is being

entered on a timely and systematic basis. OCD will work with the HMIS Coordinators in each Continuum of Care to assist in verifying the quality of the data being entered by SA staff.

d. Collaboration with the LA Dept. of Health and Hospitals (DHH) and the Local Lead Agency (LLA)

To the extent possible, OCD staff will conduct monitoring visits at the same time DHH staff are monitoring the Local Lead Agencies. OCD staff will evaluate how well the SA is collaborating with the LLA in a variety of areas to include: outreach and referral efforts, PSH eligibility, provision of support services to S+C participants, the tracking of services by maintaining Individual Housing Support Plans (IHSP), program termination/appeal process activities and providing the necessary information to track S+C match data. OCD and DHH staff will also assess how well the SA and LLA are working together consistent with the roles and responsibilities established in their Memorandum of Understanding.

e. Project Site Visit

As part of the monitoring visit for SA administering either S+C project or sponsor-based component, OCD will also conduct site visits to randomly identified project-based sites. OCD staff will focus its review on the condition of the S+C units (i.e. HQS compliance).

f. Exit Conference

OCD staff will review the results of the visit and prepare for the exit conference by completing the S+C Monitoring Worksheet. The exit conference should be held with the SA's program contact and anyone else the SA wishes to attend.

If issues were uncovered, OCD staff will identify them clearly and specify the actions needed to be taken, to correct these issues. The discussion should follow the format contained in the S+C Monitoring Worksheet to ensure that all identified issues are covered. OCD staff will work with SA staff to discuss and talk through the issues. The SA will be given every opportunity to address any findings

g. Monitoring Follow-Up Procedures

A letter of findings (merits and/or deficiencies) will then be sent to the SA, reporting the results of the monitoring visit.

The monitoring letter to the SA must include the following information:

- ~ Contract number;
- ~ Date of the visit;
- ~ Scope of the monitoring visit;
- ~ Monitoring findings and concerns (both positive and negative) supported by the facts considered in researching the conclusions;

- ~ Specific corrective actions/recommendations if necessary (i.e., means by which any finding can be resolved);
- ~ Due date of any necessary corrective action (generally 30-45 days, depending upon the nature of the findings);
- ~ If appropriate, the offer of technical assistance.

The SA should receive the written results of the monitoring visit as soon as possible. Generally all monitoring letters should be mailed within 30 days after the visit.

Upon receipt of the monitoring response from the SA, OCD staff will decide whether or not the information is sufficient to resolve/clear the finding. This is done by preparing a new status letter to the SA addressing each finding. Findings which are not properly addressed or resolved remain open and a new target date for clearance is given to the SA in this letter.

OCD staff shall continue to work closely with the SA until the finding(s) of deficiency are resolved. OCD will work cooperatively with SA to identify and improve deficiencies in program performance through the provision of technical assistance and training. However, OCD reserves the right to amend the S+C Cooperative Endeavor Agreement reducing the SA's S+C funding amount and transferring these S+C funds to another SA that has been successful in leasing their vouchers and can document the need for additional vouchers.

#### D. Monitoring Program Performance

OCD will monitor the performance of the Subsidy Administrator and its sub-recipients against goals and performance standards in their Cooperative Endeavor Agreement (CEA) and the leasing benchmarks detailed in the S+C Implementation Schedule. Substandard performance as determined by OCD will constitute noncompliance with the CEA. OCD also expects the Subsidy Administrator to actively monitor sub-recipients, project sponsors in a sponsor-based component and landlords in a project or tenant-based component in order to ensure that they are operating the supported rental housing consistent with S+C regulations. If action to correct such substandard performance is not taken by the Subsidy Administrator within a reasonable period of time after being notified in writing by OCD, OCD will move to either a reduction of the funding agreement or termination of the agreement.