

TX-601 Continuum of Care CoC Program Monitoring Handbook

Updated: November 2019

Background and Introduction

TX-601 has selected Tarrant County Homeless Coalition (TCHC) as the HUD recognized lead agency, collaborative applicant, and Homeless Management Information System (HMIS) administrator within the Fort Worth/Arlington/Tarrant County Continuum of Care Program – TX-601. The geographical area includes both Tarrant and Parker Counties.

As the continuum’s collaborative applicant, TCHC is responsible for program monitoring, evaluation, and reporting for all CoC and ESG funded programs in Tarrant and Parker County.

The purpose of the TX-601 Monitoring Handbook is to take an intentional and systematic approach to improving homeless program performance. The U.S. Department of Housing and Urban Development (HUD) continues to emphasize CoC Homeless Assistance Program performance evaluation for purposes of receiving federal funds. Program performance is regularly used during the annual CoC application process making it a critical component to the system’s success. The program monitoring process will assist with TX-601’s performance improvement efforts.

Community Dashboard Reports

Quarterly reporting of local performance targets will be published on the TCHC website according to the timeline seen below. These reports will be reviewed by the CoC Board of Directors as well as the public and will be used to measure the local homeless system of care’s progress in meeting annual performance goals established by the CoC.

Performance Period	Publishing Month
October – December	January
January - March	April
April - June	July
July – September	October

To provide a complete picture of how well our community is preventing and ending homelessness, the following measures will be collected for each quarterly report:

Measure	Desired Outcome
Total Number of Persons Experiencing Homelessness	Reduction in the number of people who experience homelessness
Percentage of individuals who moved into permanent housing	Increase in percentage of people who exit to permanent housing, including owning or renting, staying with family, or receiving a housing subsidy
Percentage of people who return to homelessness	Reduction in the percentage of people who return to homelessness 24 months after exit
Average length of time persons remain homeless	Reduction in average length of time people experience homelessness
Percentage of individuals who retain or increase employment income	Increase the percentage of adults who retain or increase employment income while being served by our system
Percentage of individuals who retain or increase non-employment income	Increase the percentage of adults who retain or increase non-employment income (TANF, SNAP, child support, SSI/SSDI, other benefits) while being served by our system

The measures are interrelated, and when analyzed relative to each other provide a more complete picture of our housing crisis system of care performance. System performance measures can be used for many purposes including analyzing effectiveness of serving people experiencing homelessness in our community, identifying gaps in the system, informing systems change and informing the rating and ranking process during the CoC grant competition.

These measures are also provided to HUD annually through the [System Performance Report](#).

Continuum of Care Programs

Monitoring Process Overview

TCHC will provide midterm monitoring reports of CoC projects to measure recipient progress in HUD compliance and achieving project goals established in the initial program application and by the CoC Board of Directors. Programs awarded funds through the Continuum of Care grant competition will be required to complete a midterm monitoring review upon completion of the first six months of the program year. Midterm reviews will consist of the following:

- HUD Compliance
- Desk Review
- Performance Review
- HMIS Compliance

TCHC will email the designated contact person approximately 14 days prior to the completion of the first six months of the program year to notify them a midterm review will be completed on the program. Requested documents will be required to be sent to TCHC no later than two weeks after the 6 months mark of the program. An on-site review will be conducted to discuss results and complete the midterm project review. A monitoring report will be generated, and results will be shared with the designated

project contact. The final report will provide data and an opportunity for organizations to analyze and create strategies for improvement for the remainder of the program year. Monitoring reports may be evaluated by the CoC Board of Directors, respective committees and included in funding competition materials.

More information on this process can be found below.

HUD Compliance

In alignment with [HUD's Internal Wellness Top Ten Checklist](#), TCHC will review the following documents and items as part of a project's midterm monitoring:

- Standard Operating Policies and Procedures for:
 - Program intake process for determining "homeless/at risk of homeless" status
 - Program operation
 - Recordkeeping
 - Subrecipient oversight/monitoring, if applicable
- Financial Policies and Procedures for:
 - Maintaining fiscal controls
 - Accounting procedures
 - Procurement procedures
 - Ensuring CoC program funds are used in accordance with requirements
- Violence Against Women Act (VAWA) Policy and Emergency Transfer Plan Template
- Antidiscrimination/Fair Housing Policy and Compliance
- Termination Policy
- Housing First Policy
- Environmental Review, if applicable
- Program has designated staff person responsible for ensuring children who are being served are enrolled in school and connected to appropriate services, if applicable

Additional documentation and/or information may be requested as needed.

As stated above, these documents will be requested prior to the on-site review. Programs will be required to submit all requested documents by the established deadline to receive credit in this section.

Desk Review

TCHC will randomly select 10 client files or 10% of client files, whichever is higher, to review for completeness. Programs will be notified 1-2 days prior to the on-site meeting of which client files will be reviewed. In alignment with [HUD's Internal Wellness Top Ten Checklist](#), program participant files to be reviewed may include:

- Documentation participants are entered into HMIS or comparable database
- Documentation participant was screened via the coordinated entry system
- Documentation of homelessness/at risk of homelessness/disability at intake (Participant Eligibility)
- Documentation of ongoing assessment of service needs of all participants and adjustment of services as necessary
- Documentation of initial and follow-up Housing Quality Standards inspections at least annually

- Leasing and rental assistance documentation and compliance
 - There is an occupancy agreement, lease or sublease in the file (for individual units); All program participants have a signed lease agreement of at least one year that was renewable (for at least one month) and terminable only for cause
 - Rents charged for a structure or unit assisted with leasing or rental assistance funds meet standards of FMR or rent reasonableness
 - If a participant is being charged for rent, the amount charged meets income requirements listed in 24 CFR Part 578.77
 - Compliance with lead-based paint requirements listed in 24 CFR Part 35, if applicable
- Recipient or subrecipient conducts an examination of income at intake and at least annually for all program participants
- Implementation of Housing First
 - Applicants can enter the program without committing to supportive services, with no expectations of sobriety, or with poor rental or financial history
 - What is a reason, if any, a client would be denied access to the program?
 - How do you ensure housing and service goals are client-driven?

Desk reviews will be completed during the scheduled on-site visit.

Performance Review

Performance reviews will consist of a program's performance for the first six months of the grant year. Agencies will be responsible for sending documentation by the requested deadline. Documentation will include an eLOCCS screenshot or other financial statement demonstrating the program's current spend down. The following will be reviewed to evaluate program performance:

- A review of the program's Annual Performance Report (APR) to date
- A review of grant management and financials:
 - Total grant amount
 - Quarterly eLOCCS drawdowns (spending to date)
 - Match documentation demonstrating grant funds, except leasing funds, are matched with no less than 25 percent of cash or in-kind contributions from other sources
- A review of project goals as determined in the initial application
- A review of the organization's CoC and Coordinated Entry System participation:
 - General Meeting attendance
 - Coordinated Entry Meeting attendance
 - # of referrals from Coordinated Entry System that have been accepted and denied; If denials exist, recipient provides reasoning
 - Staff members attend required trainings, such as HMIS, VI-SPDAT, documentation trainings
 - Staff members attend CoC meetings and trainings such as case conferencing, CTI, motivational interviewing, etc.

A performance report, based on a mock CoC scorecard, will be generated and results will be shared with the designated project contact during an on-site review.

HMIS Compliance

To ensure that security and data quality standards outlined by HUD are being met by each contributing organization, TCHC staff will monitor HMIS compliance. TCHC staff will request documents needed for HMIS compliance via email and/or review during an on-site visit. Requested documents may include policies, procedures, certifications, and agreements. Agency staff will be required to submit all information by the established deadline to receive credit for this section. Documents will be reviewed for completeness and accuracy. For more information on HMIS Compliance, please reference the [HMIS Site Data Quality checklist](#). The following items will be reviewed:

- Agreements & Certifications
 - Participating Agency Agreement
 - ETO Program/Site Creation Form
 - TCHC CoC HMIS End User Security and Privacy Agreements for all HMIS users
- Data Quality Checks
 - Staff regularly run quarterly data quality reports and regularly correct errors in timely manner
- Agency uses the CoC HMIS Standardized Release of Information (located in ETO) applicable to its level of sharing and is consistent in collecting with clients
- User Authentication, per HMIS policies
 - All users have signed user license agreements on file and are authorized to use HMIS system
 - Electronic Security Policy addresses username/password sharing, storing usernames/passwords in public locations, and storing passwords in internet browser
 - All HMIS users have unique username, password, and agency email address
- Hard Copy Data
 - Procedure in place for secure use and storage of hard copy client personal protected information, including all client (current and former) files are locked in a drawer/file cabinet and locked in an office
- Security Officer
- Virus Protection and Firewall
- Physical Access
 - All HMIS workstations and printers are in secure locations and/or staffed at all times; using password protected lock-screens for unique user-logins
 - Data Access Policy
- Data Disposal Policy/Procedures
 - Agency shreds all hardcopy Personal Identifying Information before disposal; agency reformats client data to CDs, computer hard-drives, other media before disposal
- Software Security
 - All HMIS workstations have current operating system and internet browser security, including non-HMIS computers networked with HMIS computers
- Data Collection
 - Data Collection Protocol
 - HUD and CoC Required Data Elements
 - Agency collects all HUD required Universal Data Elements within HUD intake

- Agency collects all HUD and CoC required Program Specific Data Elements within the HUD intake, mid program, and exit assessments
- Training Requirements
 - All users have completed applicable and annual training and have documentation of trainings
 - % staff that attended annual ETO/HMIS refresher training
- Has/is the program merging or expanding?
- If using comparable database, does it comply with HUD's HMIS requirements?

HMIS compliance will be completed one time annually per agency regardless of the number of programs an agency has, typically during the mid-term monitoring for one of the agency's CoC funded programs. Exceptions to this are the quarterly data quality reports and the ETO Program/Site Creation form, which will be evaluated for each CoC program individually.

On-Site Review

An on-site review will be conducted to complete the midterm project review and discuss results from each section. On-site reviews will also serve as an opportunity for open dialogue, technical assistance, and performance improvement. Project contacts will receive more detailed information on the full on-site review when it is scheduled.

At the end of the on-site review, agencies will have the opportunity to answer the following questions:

- How can TCHC better support you?
- Are there trainings you would like to see offered?
- Is there other technical assistance needed from TCHC?
- Additional Feedback?

Midterm Summary Report

Once an on-site review has been completed, the program contact(s) will receive a summary report within two weeks from TCHC staff. The report will include:

- Midterm Monitoring Overall Summary
- Performance Summary
- HMIS Summary
- Desk Review Summary
- HUD Compliance Summary

Based on the results, the report will also indicate whether the project has been selected for a Quality Improvement Plan (QIP). See *Actions Against Poor Performance* for more information on the QIP process. If a project is not selected for a QIP, it may be considered in good standing or receive suggestions for minor improvements that do not require a formal plan.

[Actions Against Poor Performance](#)

Quality Improvement Plan

A [Quality Improvement Plan \(QIP\)](#) is a grantee developed plan to aid the improvement of program performance. QIPs will be provided upon request of the recipient organization, project performance or as determined by TCHC. Areas of concern or areas needing to improve may include grant spending to date, inconsistent data within HMIS, HUD compliance issues, or significant shortfalls in performance targets. TCHC will contact grantee to inform them of the decision to target the project for a QIP and next steps.

Targeted grantees will be required to participate in at least quarterly monitoring of QIP implementation and program improvement with TCHC. The monitoring will generally take place via conference call with TCHC staff and grantee staff to review the progress of QIP implementation and performance improvement. QIPs are terminated when a project successfully implements the plan and demonstrates significant improvement. Grantees who have not met their QIP goals, have made only slight (or no) progress in their areas targeted for improvement, or have not fully implemented all the activities identified in their QIP may be required to continue their QIP for another year.

QIPs may be reviewed by the CoC Board of Directors and the Allocations Committee.

For more information regarding this process, see the **Quality Improvement Planning & Process**.

Additional Information

Documentation Requirements

Once documents have been received from HUD, all CoC grant recipients are required to provide the following documents to TCHC for official planning files. In addition to those required during the monitoring process, these documents are used to make system updates in HMIS and to provide programmatic reporting and evaluation. Failure to submit these documents to TCHC will result in an incomplete program file.

- Annual grant close-out letters
- Final eSNAPS C1.9a technical submission, where applicable
- Annual award letter and grant agreement
- Documentation of grant amendments, including request and approval, if applicable
- General communications with HUD, if applicable
- HUD audit, if applicable
- Documentation of homeless participation
- Subrecipient agreements/procurement contracts, if applicable

TCHC will also pull the final, HUD approved APR and original eSNAPS application from Sage and eSNAPS, respectively, to keep on file.

Homeless Management Information System

HMIS Data Quality Reports

The Homeless Management Information System (HMIS) serves as the main source for data collection throughout the CoC. The HMIS department works to ensure positive data quality and accuracy. While not all data elements can be collected for all clients due to individual circumstances, every agency should make efforts to obtain as complete information as possible. Information on data fields and

elements are included in HUD’s [HMIS Data Quality Standards](#). For additional questions/concerns, contact TCHC HMIS staff.

HMIS Documentation Requirements

Participating Agency Agreement

The **Participating Agency Agreement** details the responsibilities of agencies that collect data within HMIS, as well as the responsibilities of TCHC as the CoC’s administrating agency. One agreement must be filled out by each participating agency. This agreement is to be signed by an authorized representative of the agency.

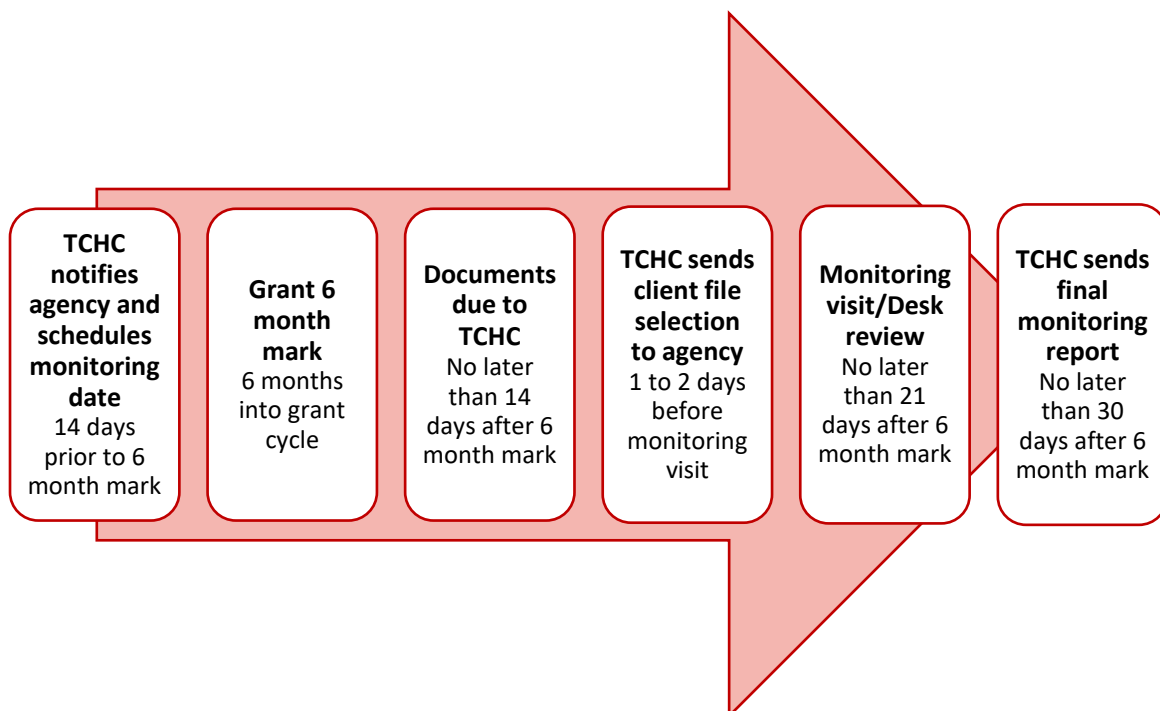
Program Creation & Updated Project Descriptors

Once awards have been announced, recipients must fill out an **ETO Program/Site Creation Form**. This form should be filled out for **each new project as well as existing projects that undergo change, such as merges or expansions**. The information on the form should match the eSNAPS application turned into HUD and should be sent to the HMIS office no later than 30 days prior to the project start date to ensure the organization’s ability to begin data entry on the program start date. This form will assist the HMIS team in building effective sites and in providing accurate data reports for each individual program. For more information on HMIS Project Descriptors, see [HUD’s guide for HMIS users and administrators](#).

End User Agreement

Organizations must have all HMIS users attend new user and annual HMIS trainings and provide TCHC with a copy of the signed **TCHC CoC HMIS End User Security and Privacy Agreement**. This document outlines expectations and responsibilities of persons using HMIS.

Mid-Term Monitoring Timeline



Annual Performance Report (APR)

The APR is used by HUD to track the progress and accomplishments of the projects they fund. The APR is also used in the development of annual project performance score cards used during the CoC funding competition and measuring CoC-wide achievements.

All CoC Program recipients are required to complete an APR in the [Sage HMIS Reporting Repository](#) within 90 days from the operating year end date.

Procedures

TCHC will work with each CoC recipient during the preparation of their APR to ensure timely submission and provide technical assistance as needed.

- TCHC staff will email the designated contact person within one week of the program year end date with a list of items to be adjusted by the grant recipient. Initial contact will also include a confirmation of APR due date. Examples of items included in the error report include missing or inconsistent data.
- CoC recipients will be responsible for contacting TCHC staff with any issues with data correction so that technical assistance can be provided. **To ensure timely submission, requests for assistance should be made at least 30 days prior to the HUD due date.**
- TCHC staff will conduct a final data review no later than the first week in the month of the HUD submission deadline to ensure necessary corrections have been made for successful Sage CSV upload.
- CoC recipients are responsible for entering ALL applicable information into Sage including basic grant information, bed and unit inventory/utilization, financial information, and the CSV containing data from HMIS.

HUD has provided the [CoC APR Guidebook](#), which provides steps for APR submission through the Sage HMIS Reporting Repository. Additional SAGE training can be requested by contacting TCHC staff. If the person responsible for submitting the final APR does not have a SAGE account or needs assistance generating the APR data, contact the TCHC Planning Department.

TCHC Contact Information

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