



# **North Dakota-500 Statewide Continuum of Care Monitoring Plan**

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CoC Board Approval: December 23, 2020  
CoC Membership Approval: February 3, 2021

Next Review: December 2021

## **I. OVERVIEW**

- A. The North Dakota Housing Finance Agency (NDHFA) acts as the U.S Department of Housing and Urban Development (HUD) Program Collaborative Applicant for the ND-500 Continuum of Care (ND CoC). As the Collaborative Applicant, NDHFA is required to monitor compliance and performance of all CoC-funded projects, as well as assess program performance and effectiveness. Monitoring is an ongoing process and is intended to improve program effectiveness and management efficiency.
- B. The purpose of monitoring is to determine whether grant activities are implemented in compliance with statute 24 CFR part 578, Notice of Funding Availability (NOFA) notices, and other programmatic guidance. It will include, where applicable, analysis of subrecipients and contracted programs.
- C. All recipients and subrecipients are subject to HUD monitoring at HUD's discretion. In addition, recipients are required to monitor their subrecipients. As part of the terms of a grant agreement, recipients and subrecipients certify that HUD has the authority to monitor as it deems appropriate. This condition should also be included in subrecipient agreements. Monitoring allows HUD, the ND CoC, and recipients to assess performance, compliance, and program/project process.

## **II. SCOPE OF MONITORING**

- A. Any ND CoC-funded agency, program/project, or subrecipient will be subject to monitoring either remotely or in-person at a minimum of once per year by the Collaborative Applicant.
- B. Goals of Monitoring
  - 1. Fulfill the requirement of a grant recipient or subrecipient and of the CoC to monitor CoC-funded recipients and subrecipients.
  - 2. Improve program performance, effectiveness, and efficiency.
- C. Responsible Parties
  - 1. Board of Directors
  - 2. Collaborative Applicant
  - 3. HMIS Lead Agency
- D. Scores: The CoC may score monitoring and this may be used as a factor when rating and ranking projects during the CoC competition.

## **III. AREAS AND SCOPES OF REVIEW**

- A. Eligibility/Recordkeeping: Review of documentation of eligibility for homeless status, chronic homelessness (CH), or disability. Compliance of eligibility helps service providers ensure that project's resources are provided to clients that need them the most, learn about clients' needs and how to best serve them, and makes it easier and quicker to apply for funds.
  - 1. Documentation about participant eligibility
  - 2. Documentation of chronology of CH episodes
  - 3. Documentation of acceptable forms of verification

- B. Supportive Services: Review of annual assessments of service needs and service plans for project participants and corresponding adjustment of supportive service plans.
  - 1. Review of treatment, supportive service plans, or reassessment of progress
  - 2. Documentation of services provided
- C. Housing: Monitoring of adequate screenings of housing conditions and habitability.
  - 1. Housing Quality Inspection lead based paint requirements
  - 2. Regular inspections of unit habitability
- D. Client Payments: Monitor for income and rent documentation, proper calculation, and verify that amounts paid with grant funds are allowable.
  - 1. Review of detailed expense reports, allowable costs, and match documentation
  - 2. Verification of client income
- E. Program Policies and Requirements: Review of required written policies and procedures.
  - 1. Written standards and conflict of interest policy
  - 2. Rules and regulations for clients
  - 3. Rules and regulations for staff
  - 4. Client participation in policy-making or day-to-day operations
  - 5. Client grievance procedures
  - 6. Termination of assistance
  - 7. Emergency safety and evacuation procedures
  - 8. Discharge planning
  - 9. VAWA data compliance (where applicable)
  - 10. Confidentiality and privacy policies
  - 11. Non-discrimination and equal opportunity/Equal Access Rule
- F. Use of Program Income and Match: Monitor to check that appropriate and sufficient match has been provided and documented.
  - 1. Eligibility of sources used as match
  - 2. Adequate documentation of matches (i.e. MOU for in-kind services, match letter of intent)
- G. Fiscal Management: Fiscal monitoring allows recipients and subrecipients to verify that their financial systems and documentation are sufficient to substantiate the use of grant funds and are operated in accordance with accounting principles and applicable federal requirements.
  - 1. Agency use of funds, grant management, spend down, and eligible expenses
  - 2. Timeliness of setting up new grants and drawdowns
- H. Staff Time Distribution: Monitor that staff time and associated costs charged to the project are explicitly tracked by eligible activity.

1. Review of staff time records to assess for eligible activities
2. Review of grant files to check for records documenting specific hours worked
- I. Project Outcome Data: Review of outcome data from Annual Performance Reports (APR).
  1. Review of outcome data from APR as related to System Performance Measures (SPM)

#### **IV. CONDUCTING MONITORING OF PROJECTS**

- A. The Collaborative Applicant will conduct programmatic and fiscal monitoring to assess compliance with HUD regulations and identify areas for improving program effectiveness and efficiency. The Collaborative Applicant will review and analyze background documents, files and forms for CoC compliance, as well as financial management information. In the case of remote monitoring, the requested documentation shall be in electronic format. Agencies will be asked to provide documents from their CoC-funded programs, including, but not limited to:
  1. Risk Assessment Tool (Appendix A)
  2. Documents related to participant eligibility
  3. Written policies and procedures
  4. Client (re)assessment documentation
  5. Housing screening documentation
  6. Match letters for CoC Program grants currently in effect
  7. Electronic grant files
  8. Grant agreements or contracts with HUD or the CoC
  9. HUD monitoring reports and agency responses associated with the CoC-funded project(s)
  10. Recent invoices and drawdowns sent to HUD for each project
  11. Financial audits
  12. Financial reports and associated backup documentation as they pertain to CoC funds
  13. Staff time records
  14. List of staff
  15. List of board of directors and contact information
  16. Project outcome data
  17. Any other electronic documents necessary to verify contract compliance
- B. A letter will be issued to each agency notifying them of the results of the analysis.
- C. Based on the initial analysis, the Collaborative Applicant may conduct some data collection activities remotely or onsite. Conducting activities onsite would be preferable, as it would allow the Collaborative Applicant to explore more documentation and hard copy files, as well as to establish rapport with individual project staff.

- D. Upon completion of remote and/or onsite monitoring, a monitoring letter will be issued to agencies with the monitoring conclusions that identifies accomplishments, findings, and concerns (if applicable). If findings or concerns are identified, target dates for corrective actions will be documented in the monitoring letter.
- E. A follow-up will be scheduled for those agencies where findings or concerns were identified to review corrective actions and/or to develop a plan if corrective actions have not been implemented.

## **V. TIMELINES**

- A. January: Documentation request of CoC-funded projects
- B. February: Documentation due to Collaborative Applicant
- C. March-April: Collaborative Applicant review and analysis of documentation.
- D. May: Issue a letter that summarizes the analysis to agencies. The letter will include whether the agency will require remote or onsite monitoring.
  - 1. Agencies will be scored based on the provided documentation and the Risk Assessment Tool and will be grouped as Low Risk, Moderate Risk, or High Risk grantees.
    - a. Low Risk: Score of 0 percent to 15 percent. Low Risk grantees will not receive a monitoring visit. However, after two years of low risk designations, these recipients/subrecipients will receive an on-site monitoring.
    - b. Moderate Risk: Score of 16 percent to 40 percent. Moderate Risk grantees will receive a remote monitoring. If serious issues are identified during the remote monitoring, an on-site monitoring may occur.
    - c. High Risk: Score of 41 percent to 100 percent. High Risk grantees will receive an on-site monitoring visit.
- E. May-June: Response from agencies to any concerns provided in the report.
- F. July-December: Follow-up with all agencies, conduct remote monitoring and on-site visits, and develop agency improvement plans if necessary.
- G. December: Provide final report to the Board of Directors.

## **VI. APPENDICES**

- A. Appendix A: Risk Assessment Tool
- B. Appendix B: Monitoring Checklist for Program Participant Files
- C. Appendix C: Monitoring Form

## APPENDIX A – RISK ASSESSMENT TOOL

Risk Indicator	Status	Comments
<b>PERFORMANCE/REPORTING</b>		
1		
2		
3		
4		
<b>FISCAL MANAGEMENT</b>		
1		
2		
3		
4		
<b>PROGRAM</b>		
1		
2		
<b>DATA</b>		
1		
2		
3		
4		
<b>Total Questions</b>		<b>14</b>
<b>Total "No" Responses</b>		<b>0</b>
<b>Total "Yes" Responses</b>		<b>0</b>
<b>Total "N/A" Responses</b>		<b>0</b>
<b>Total "No" Percentage</b>		<b>0%</b>
<b>Total "Yes" Percentage</b>		<b>0%</b>
<b>Total "N/A" Percentage</b>		<b>0%</b>
<b>Risk Level Based on # of "No" Responses</b>		<b>Low Risk</b>

# APPENDIX B – MONITORING CHECKLIST FOR PROGRAM PARTICIPANT FILES

## Eligibility Documentation Required Upon Intake

- Government-issued photo identification
- Birth Certificates for minors, under 18 years of age
- Proof of Social Security Number
- Participant HMIS intake application
- Certification of homelessness and verifying documentation
- Certification of chronic homelessness (if applicable) and verifying documentation
- Certification if disability (permanent supportive housing only)

## Program Documentation

- HMIS Client Informed Consent and Release of Information
- Case notes
- Ongoing service tracking, with an individual service plan
- Initial, annual, and reassessment rent calculations
  - Verification of income/zero income certification
  - Current utility allowances rates worksheet
- Current assets declaration
- School-age child form, inf applicable
- Housing Habitability Standards Form (SFN 61266)
- Lead-Based Paint Disclosure
- Lease agreement, specific to program type

### Programs with leasing funds include both:

- Lease agreement between the program and property owner; and
- Occupancy agreement or sublease between the program and participant

### Programs with rental assistance funds include:

- Lease agreement between the participant and property owner