

## HMIS and CoC Monitoring Policy and Procedures

The purpose of this document is to provide guidance for conducting Homeless Management Information System (HMIS) and Continuum of Care (CoC) monitoring. Based on the **HMIS Proposed Rule 580.9 (e)** and **Section 578.7 of the CoC Program Interim Rule,** the lead agency (The Homeless Alliance of WNY) is responsible for monitoring and enforcing compliance by all Covered Homeless Organizations (CHOs) with all HUD requirements and will report compliance to the Continuum of Care and HUD. Each agency has signed an Agency Participation Agreement with The Homeless Alliance of WNY explicitly stating that they will be monitored. Each agency will be monitored at minimum every three years.

* **CoC** Monitoring addresses compliance with the following: national objectives; client eligibility; project progress; fiscal policies; confidentiality; overall management systems; conflict of interest; financial management and audits, allowable costs; cost principles and adherence to federal grant regulations; program income and program disbursements; records maintenance; anti-discrimination, affirmative action and equal employment opportunity; documentation that there is a homeless/formerly homeless persons on Board or involved in other policy making group if available.
* **HMIS** Monitoring addresses compliance with the following: national objectives; client eligibility; project performance; confidentiality and privacy policies; agency agreements with HAWNY; overall management systems; adherence to federal grant regulations; client records; records maintenance; anti-discrimination, affirmative action, and equal employment opportunity.

All of the documentations related to the HMIS and CoC monitoring procedures will be posted on HAWNY’s website.

## ****Objectives and Strategy****

Our objective is to monitor HMIS and CoC project recipients to:

* Ensure HMIS Privacy and Security regulations are being met
* Ensure that client records match HMIS client records
* Ensure that projects are meeting national data quality objectives
* Ensure that projects are meeting national and local performance objectives.
* Documenting compliance with project rules and record requirements.
* Ensure that project’s and activities recipient’s support operates in a consistent, effective and efficient manner, consistent with the project’s intent.

## Preparing for Monitoring

The order of monitoring is determined by a risk assessment; each risk factor is weighted differently. The total score is 100 points. The projects will be monitored in order from highest to lowest according to the risk assessment.

The selected agency will be informed of the date and time of the visit at least two weeks before the site visit. At least one HAWNY staff member will perform the monitoring visit.

Monitoring is agency based; however, if more than one project is located in the same location, they will be monitored at the same time. Separate forms will be completed for each project.

It is possible that both HMIS and CoC monitoring will take place at the same visit. This will be determined by a combined risk assessment score.

## Risk Assessment

HMIS

**Each** recipient is evaluated annually out of 100 points to determine the risk inherent to the program. The recipients will be ranked from the highest score to the lowest score. Programs will be evaluated according to the following risk assessment:

* Has not been monitored in 3 years (40 pts)
* HMIS staff turnover (5 pts)
* Data quality (>5% error rate) (APR and Monthly Report Cards) (25pts)
* Does not receive federal program funding (5pts)
* Previous monitoring findings (10pts)
* Staff Responsiveness-- Has there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? (15 pts)

COC

**Each** recipient is evaluated annually out of 100 points to determine the risk inherent to the program. The recipients will be ranked from the highest score to the lowest score. Programs will be evaluated according to the following risk assessment:

* Has not been monitored in 3 years (40 pts)
* Staff turnover (5 pts)
* Project Performance (25pts)
* Does not receives federal program funding (5pts)
* Previous monitoring findings (10pts)
* Staff Responsiveness-- Has there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? (15pts)

## Monitoring Process

There will be two parts of monitoring: remote monitoring and a site visit. The monitoring checklist will include all of the items that the HAWNY staff will review: both on-site items and remote monitoring questions.

1. HAWNY staff will complete the risk assessment and prioritize the agencies to be monitored.
2. We will send a letter informing of intent to monitor to the agency Executive Director and HMIS Agency Administrator or Program Manager within 3 weeks.
3. HAWNY Staff will complete remote monitoring before the site visit.
4. HAWNY Staff will have an entry meeting with the Executive Director and HMIS Agency Administrator or Program Manager
5. The on-site monitoring visit will take place immediately following the entry meeting.
6. HAWNY Staff will conduct an exit interview to explain preliminary results of the monitoring visit.
7. HAWNY will send a letter within 30 days of the exit interview that will contain any findings and concerns we may have.
8. If required, the agency will respond within 30 days with a corrective action plan addressing our initial findings and concerns along with addressing any conflicts you may have.
9. HAWNY will then review this plan and work with the agency to facilitate any findings, concerns and conflicts