



Effective Approaches to Monitoring

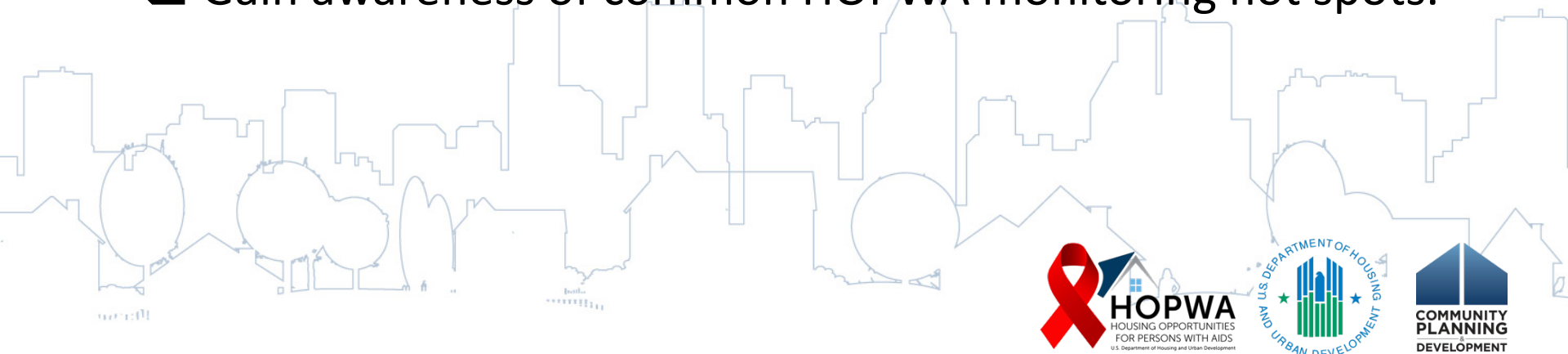
National HOPWA Institute 2017
Tampa, FL



Effective Approaches to Monitoring

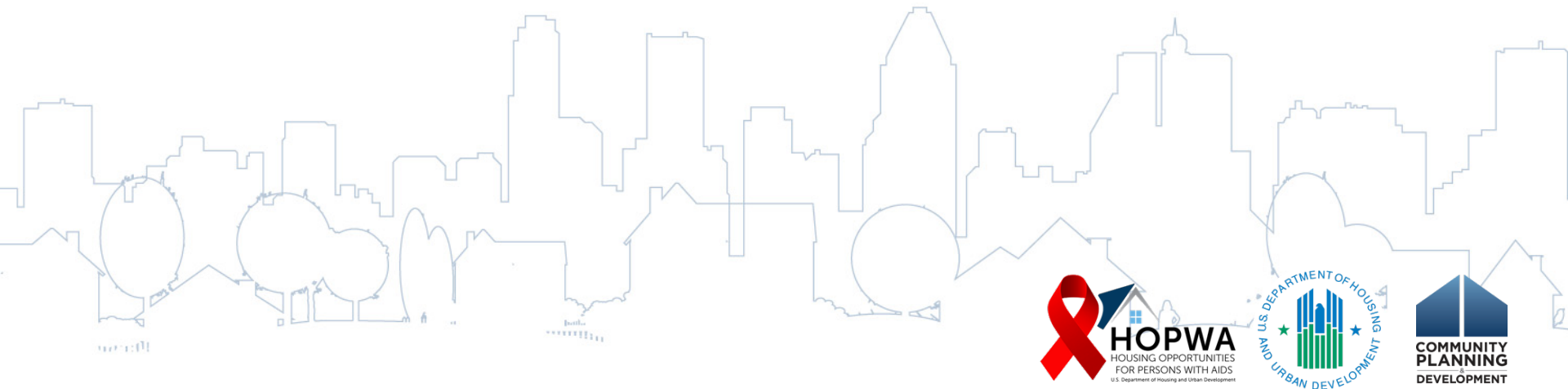
Learning Objectives:

- ☐ Understand common and effective framework to approach grant oversight and monitoring.
- ☐ Know descriptions of basic monitoring terms and elements.
- ☐ Gain awareness of common HOPWA monitoring hot spots.



The HOPWA Institute:

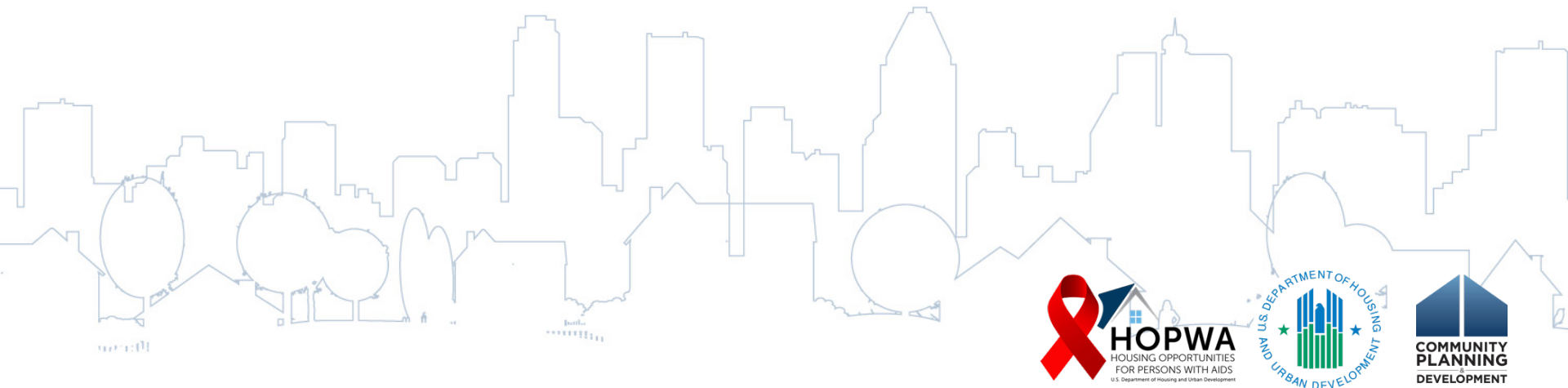
“Housing’s Role in Ending the HIV Epidemic”



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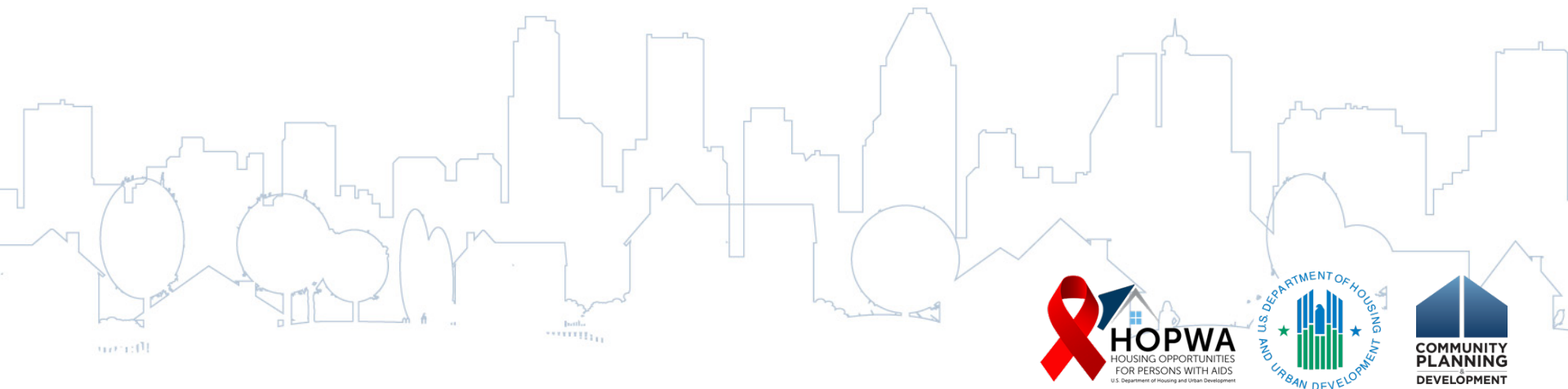
☐ Why Monitor

- ☐ Grantee & Project Sponsor Agreement
- ☐ Oversight Plan (Planning)
- ☐ Monitoring Terms & Descriptions
- ☐ Grant and Participant-Level Basic Monitoring Elements
- ☐ Monitoring – HOT Spots



Why Monitor?

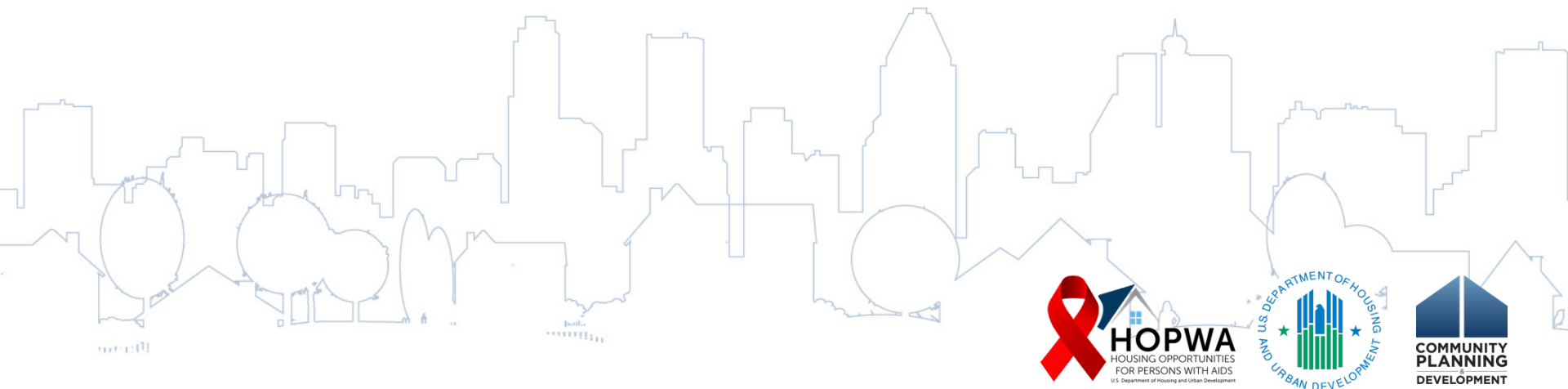
- Ensures Accountability
- Ensures Effective & efficient use of resources
- Helps assess response to community need
- HUD Requirement



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Grantee & Project Sponsor Agreement

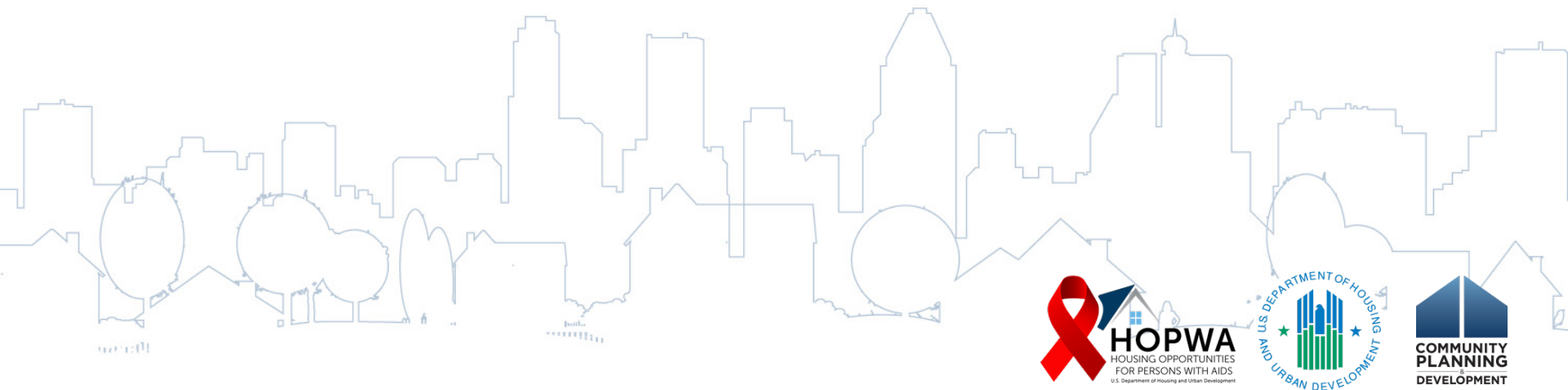
Outlines the terms & conditions of receipt and use of HOPWA funds, such as

- Describes funded HOPWA Activities
- Illustrates project goals & scope of work
- Clarifies billing process & required documentation
- Details reporting procedures & performance measurements
- Includes information regarding applicable regulatory requirements
- Provides information on monitoring expectations and requirements



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Oversight Plan (Planning)

An oversight plan is critical to *effective monitoring* and is an ongoing process that involves planning, implementation, communication and follow-up. The oversight *plan* should provide a detailed description of monitoring activities, such as....

- Conducting risk a risk analysis, and how a risk analysis is used
- Remote monitoring activities
- On-site monitoring activities
- Which staff will conduct monitoring activities
- Which activities will be monitored
- How monitoring visits are scheduled
- Explanation of the monitoring process
- Include key monitoring terminology
- Process for follow up
- Grantee and Project Sponsor responsibilities



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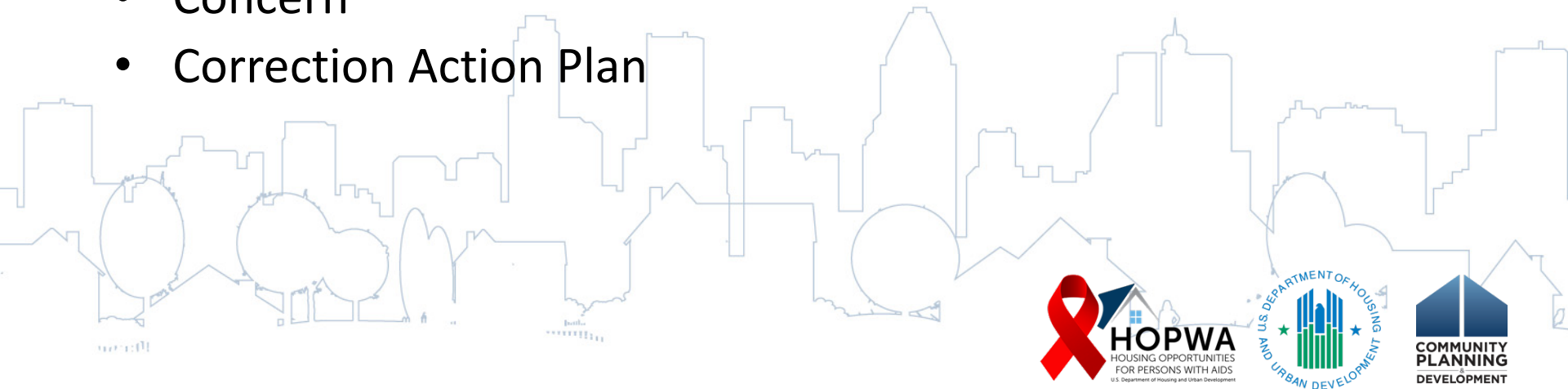
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- ☒ **Monitoring Terms & Descriptions**
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Monitoring Terms & Descriptions

Common monitoring terms

- Risk Analysis
- Remote Monitoring
- On-site Monitoring
- Finding
- Concern
- Correction Action Plan



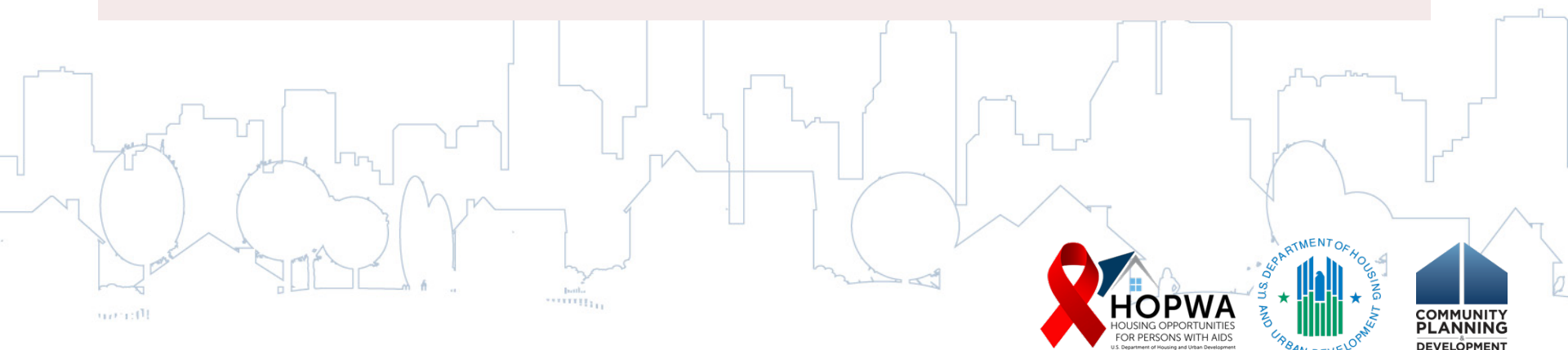
Monitoring Terms & Description

Monitoring Terms	Description
Risk Analysis	Assesses potential risks a grantee or project sponsor may have in managing their program, indicates areas where the grantee should focus monitoring efforts
Remote Monitoring	Review through ongoing interactions – submitting timely billing and adequate supporting documentation, spend-down burn rate (slow or fast), billed activities in line with scope of work and budget, number of units occupied, timely submission of performance reports, etc.
On-site Monitoring	Comprehensive program review of participant files, eligibility documentation, compliance with confidentiality, income verification, assessment of housing need, ensure units meet habitability standards/HQS, etc.



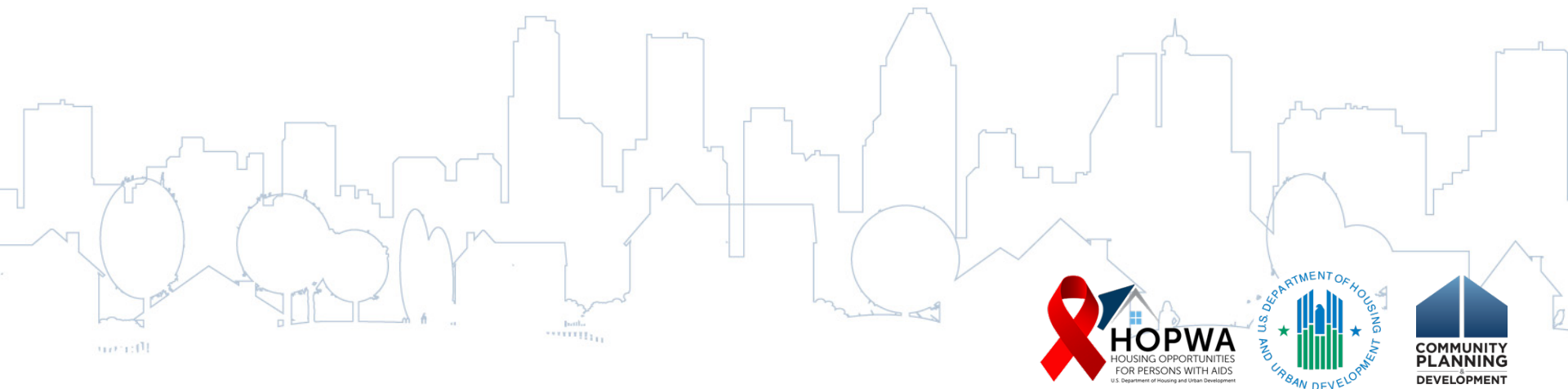
Monitoring Terms & Description

Monitoring Term	Description
Concern	A concern is a deficiency in program performance not based on statutory, regulatory, or program requirements, and sanctions or corrective actions are not posed. Concerns left unresolved often lead to a future finding.
Finding	A finding is a deficiency in program performance based on material noncompliance with a statutory, regulatory, or program requirement for which sanctions or corrective actions can be posed.
Corrective Action Plan	Refers most often where findings occur that require additional information and remedies. Correction action plans include completion timelines, such as 30-days, as well as identification of responsible parties.



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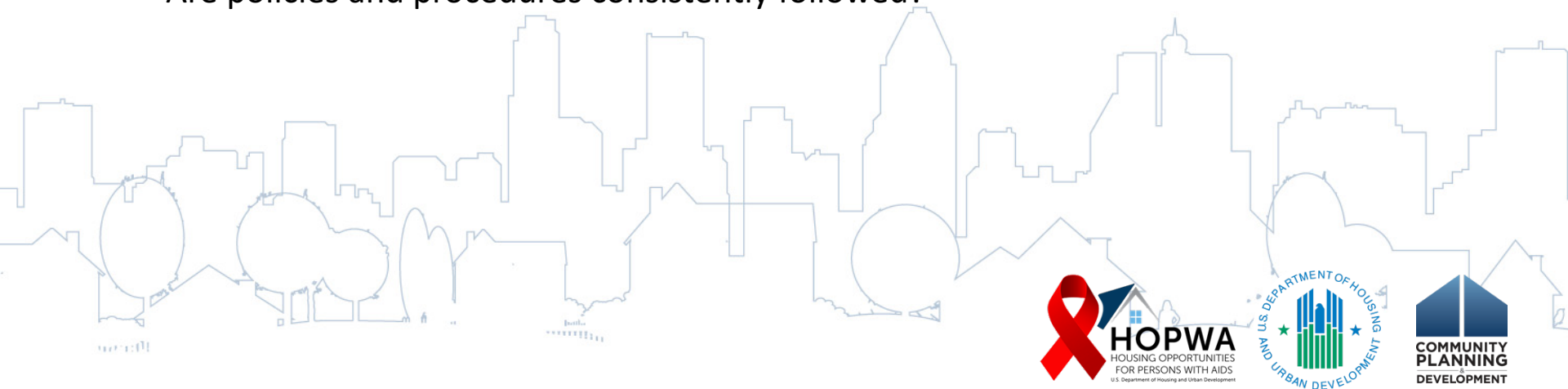
Grant-Level Basic Monitoring Elements



Grant-Level Basic Monitoring Elements

How well is the Project Sponsor managing grant funds....

- How slow or fast is the expenditure rate?
- Are expenditure rates within expectations?
- Are funds draws associated with approved activities?
- Does it appear there may be some unexpended funds?
- Does it appear there may be a short-fall?
- Are some budget lines expended at a slower or faster rate than others?
- Are policies and procedures in compliance with grant agreements and regulatory requirements?
- Are policies and procedures consistently followed?



Participant-Level Basic Monitoring Elements

HIV verification

Releases of
Information

Income
Documentation, Rent
Calculations & Annual
Recertification

Habitability Standards,
Rent Reasonableness
& Lead Paint

Individual Housing &
Service Plans



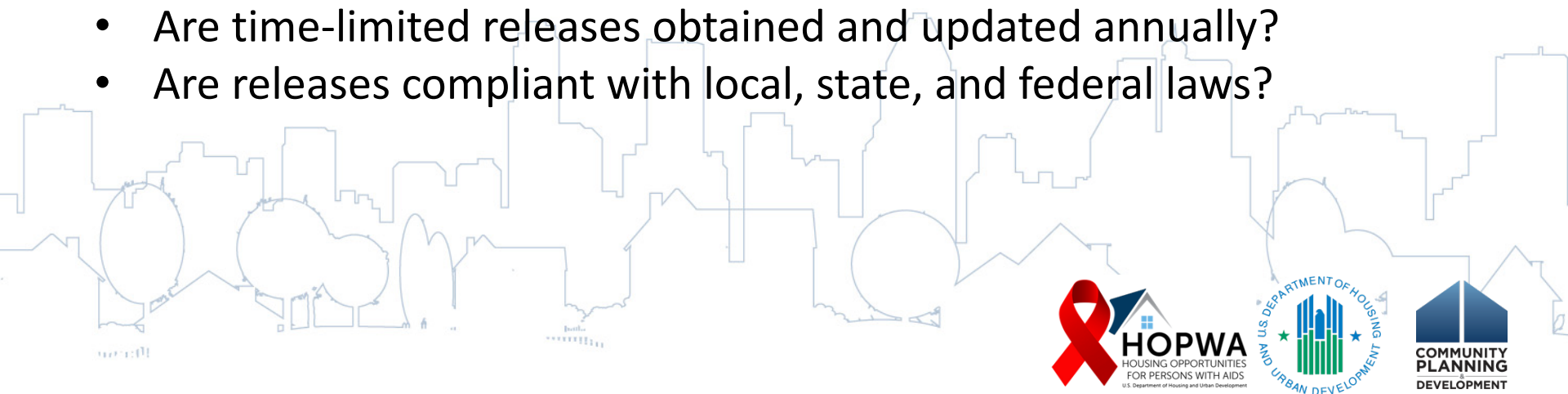
Participant-Level Basic Monitoring Elements

HIV Verification obtained

- Signed by physician, certified health care worker, or HIV test-site representative
- Social Security documentation indicating nature of disability
- Other relevant federal program records verifying HIV status

Releases of Information

- Are time-limited releases obtained and updated annually?
- Are releases compliant with local, state, and federal laws?



Participant-Level Basic Monitoring Elements

Income documentation, Rent Calculations & Annual Recertification

- Is household composition documentation present?
- Are rent calculations completed accurately?
- Are income allowances and deductions applied correctly?
- Are zero income certifications completed for those household members claiming zero income?
- Are income recertifications completed annually?



Participant-Level Basic Monitoring

Habitability Standards, Rent Reasonableness & Lead Paint

- Are habitability inspections completed at move-in AND annually?
- Is there evidence of a lead paint visual assessment (if applicable)?
- Is there documentation indicating that rent reasonableness was completed?



Pop Quiz! True or False

1. Habitability Inspections are not required in HOPWA funded facilities if the facility is owned by a HOPWA Grantee or Project Sponsor.

Answer: False

2. If a TBRA program participant is pregnant and a child under the age of 4 will be living in the unit, a lead-base paint visual assessment is required.

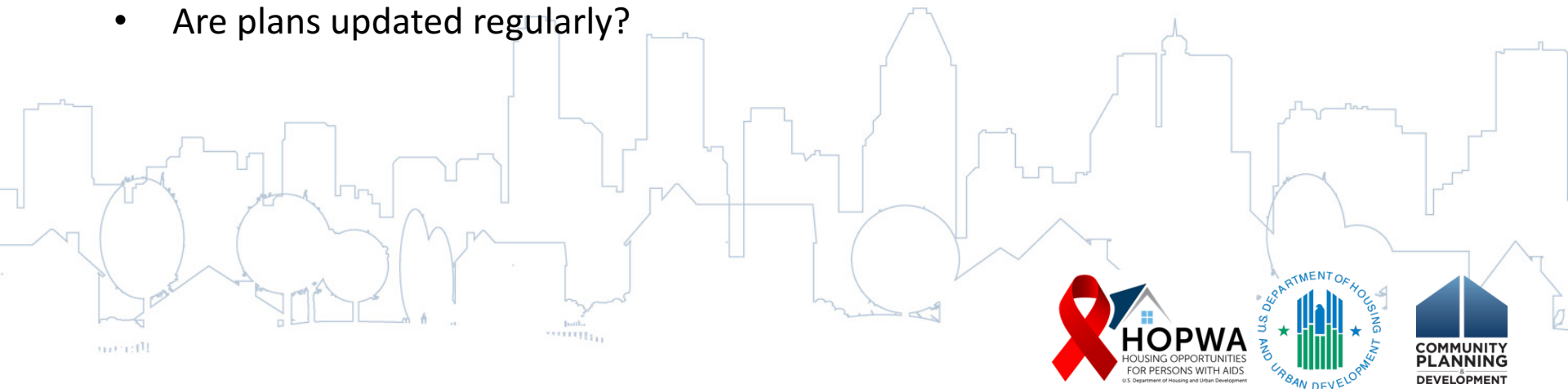
Answer: True



Participant-Level Basic Monitoring Elements

Individual Housing & Service Plans

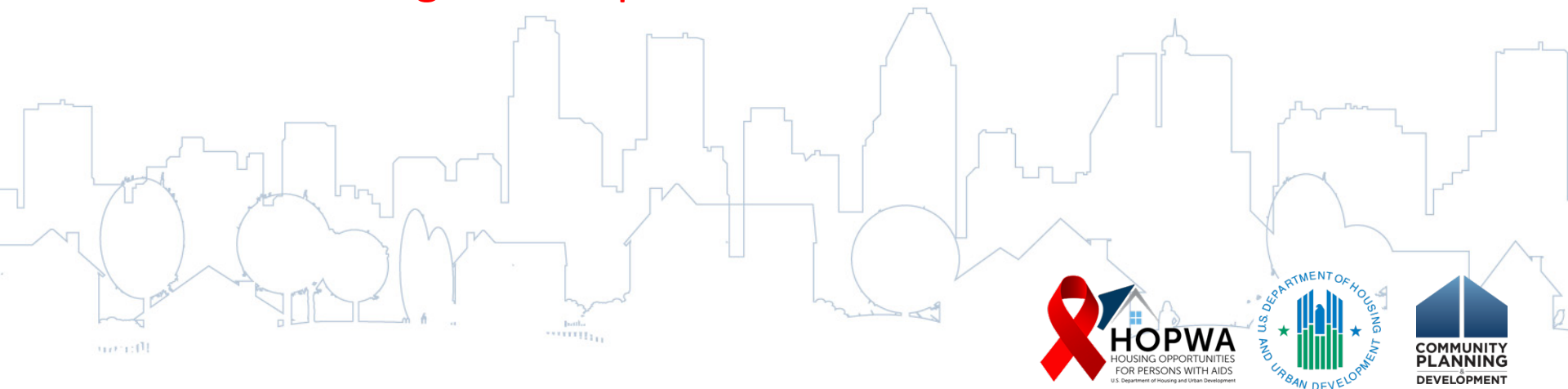
- Are housing assessments plans completed with clients?
- Do plans assess stability of current housing and/or recent housing?
- Do plans capture applicable history of homelessness and causes of homelessness?
- Do plans include details on housing barriers, plans to address barriers?
- Do plans track progress?
- Are plans updated regularly?



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❑ Monitoring – HOT Spots



Program Activities – HOT Spots

Tenant-Based
Rental Assistance

Short-Term
Supported Housing
(Emergency
Housing)

Facility-Based
Housing

Short-Term Rent,
Mortgage & Utility
Assistance

Supportive Services

Grants & Financial
Management



TBRA – Monitoring HOT Spots

Watch out for....

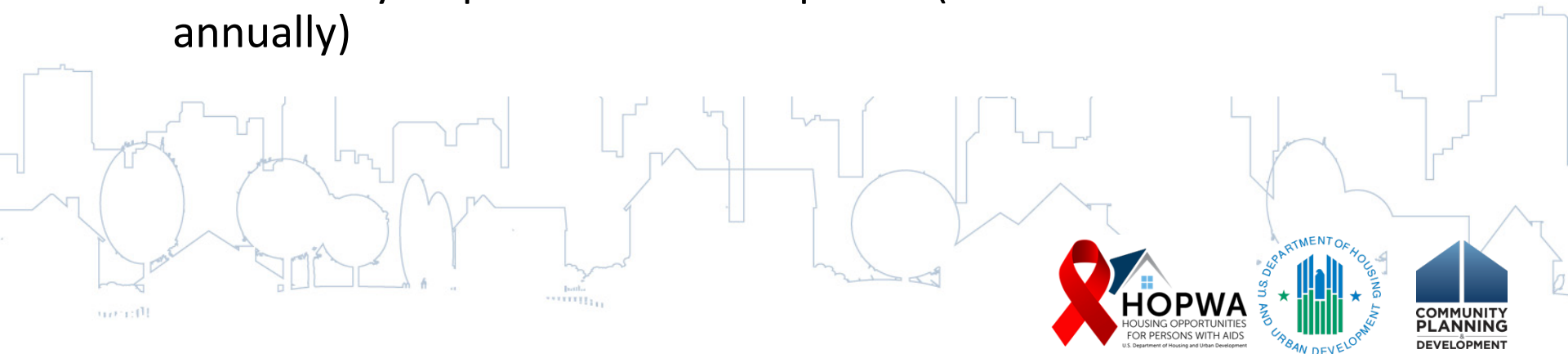
- Incorrect rent calculations
- Incorrect household income determination
- Incorrect HOPWA subsidy amount
- Inadequate supporting documentation for allowances and/or deductions
- Earned Income Disregard not applied correctly
- Incorrect utility allowance used



TBRA – Monitoring HOT Spots

Watch out for...

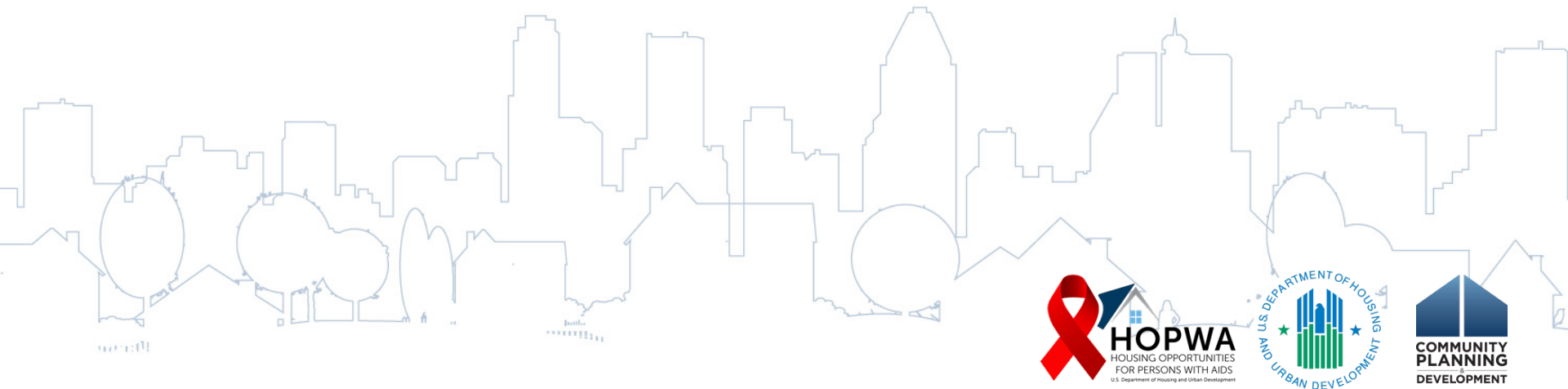
- Lead-Based Paint visual assessments not completed, as required
- Rent reasonableness not completed or incorrectly completed
- Leases not on file
- Leases on file, not signed or dated
- Habitability Inspections not completed (at move-in or annually)



Short-Term Supported Housing (Emergency Housing) –HOT Spots

Watch out for....

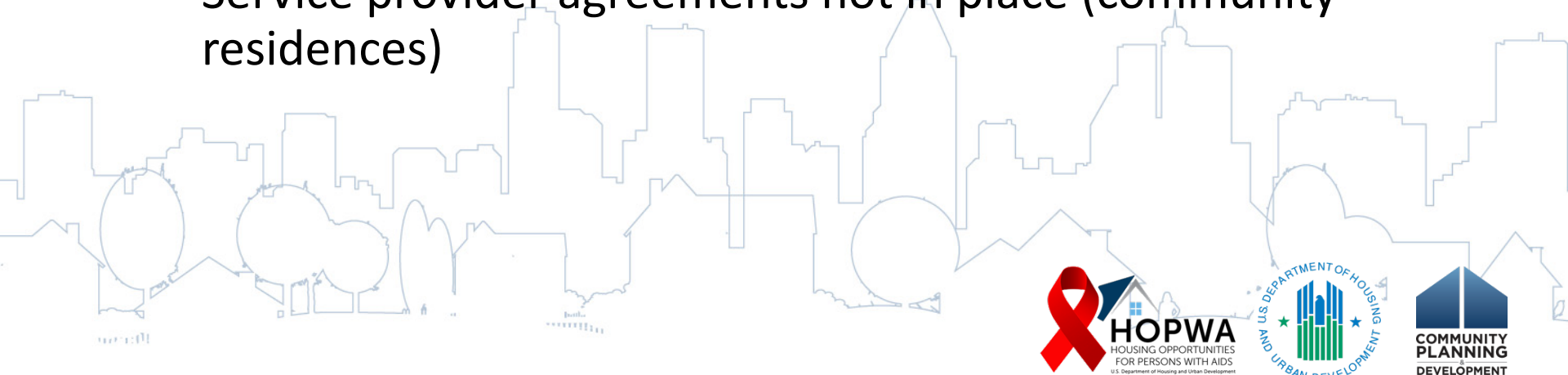
- Short-term supported housing time and size limits
- Documented and completed individual housing & service plans
- Lack of documentation indicating offers for supportive services/case management



Facility-Based Assistance – HOT Spots

Watch out for....

- Habitability inspections not completed
- Resident rents incorrectly calculated
- Charging residents fees other than rent
- Inadequate on-site services
- Not tracking or enforcing minimum use periods
- Service provider agreements not in place (community residences)



Pop Quiz! True or False

1. STRMU may be utilized for payment of condo fees only if the fees are included as part of the monthly mortgage payment.

Answer: True

2. For TBRA program participants, TBRA may be used to pay first month's rent.

Answer: True



STRMU – Monitoring HOT Spots

Watch out for....

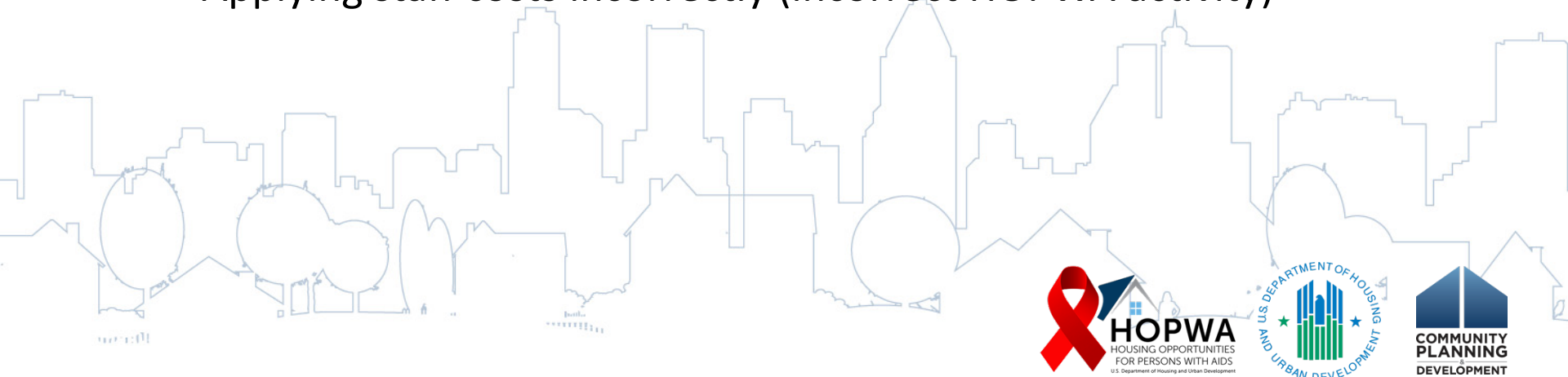
- Lack of documentation of need
- Time limits calculated correctly
- Housing need assessment & plans incomplete
- Income eligibility
- Ineligible costs
- Inadequate documentation – not supporting legal right to reside in the unit and/or responsibility to pay (rent and/or utilities)
- Inconsistent method used to determine STRMU time limits
- Lack of documentation indicating an offer for supportive services/case management



Supportive Services – Monitoring HOT Spots

Watch out for....

- Inadequate documentation of services provided
- Noncompliance with healthcare limitations
- Lack of supportive services tracking detail
- Ineligible costs
- Applying staff costs incorrectly (incorrect HOPWA activity)



Grants & Financial Management

Watch out for.....

- Are staff costs supported by timesheets or equivalent?
- Are timesheets signed by the employee or authorized staff with directly knowledge of work performed?
- Do staff costs reflect 'after-the-fact' activity for each employee covering a relevant time period?
- How transactions are recorded
- Who has the authority to approve financial transactions?
- Do financial management policies separate duties effectively?
- Are costs allowable, reasonable, allocable and documented?



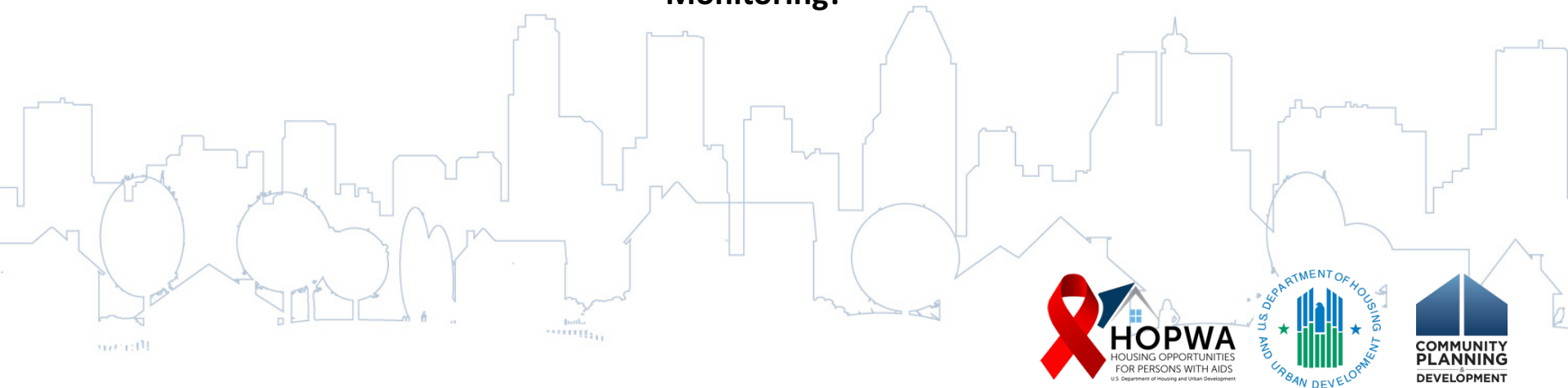
Effective Approaches to Monitoring

We have covered A LOT of information regarding Effective Approaches to Monitoring, and you have all learned about....

Why Monitor, common terms and definitions, basic monitoring elements, and watch out for....monitoring HOT Spots

*Further HOPWA Monitoring Guidance may be found in the HOPWA Oversight Resource Guide at:
<https://www.hudexchange.info/resource/1003/hopwa-grantee-oversight-resource-guide/>*

Thank you for your attention & attendance during our presentation on Effective Approaches to Monitoring!



Questions?

