

Continuum of Care Program (CoC Program) /Emergency Solutions Grant (ESG) Performance Monitoring and Evaluation Policies and Procedures

1. Overview

The federal Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program interim rule requires project- and system-level performance monitoring and project-level compliance monitoring. The policies and procedures in this document describe the process the CoCs will use to conduct this monitoring. They are intended to help the CoCs separate project monitoring and evaluation from project scoring.

Performance Monitoring

When conducting project- and system-level performance monitoring, the interim rule requires CoCs to consult with CoC and Emergency Solutions Grant (ESG) recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers.

This document establishes the process by which the Maine and Portland CoCs will:

- Set annual performance measures and targets in consultation with CoC and ESG recipients and subrecipients;
- Monitor CoC and ESG recipient performance against those targets;
- Report monitoring results to projects, CoC and ESG recipients;
- Provide technical assistance to poorly performing projects; and
- Take action against projects that have ongoing poor performance.

Compliance Monitoring

Under the CoC Program interim rule, recipients must ensure they are operating their project(s) in accordance with the provisions of the McKinney-Vento Act and all requirements under the CoC Program. As of 2014, all CoC projects in Maine are direct recipients from HUD and therefore assume responsibility for the project-level compliance monitoring and subrecipient monitoring. Recipients must monitor their subrecipients at least annually to ensure compliance with CoC Program requirements. ESG subrecipient projects are monitored annually by the ESG recipients who assume responsibility for project-level compliance.

CoCs must monitor their recipients and their subrecipients regularly to ensure compliance system-level expectations.

2. Committee Overview

- **Performance Measures Planning Committee** – The Performance Measures (PM) Planning Committee is comprised of members appointed by the Portland CoC and Maine CoC. This group is charged with facilitating and planning the annual Performance Measures Meeting at which the CoC will set measures for their programs for the upcoming year(s). The full responsibility of this committee is outlined below under “Process for Establishing Performance Measures.”
- **CoC Monitoring Committee** (Formerly the “Prioritization Committee” for the Portland CoC. Formerly “Project Committee” for the Maine CoC.) – The CoC Monitoring Committee is comprised of members nominated by the Portland CoC and Maine CoC. This group is charged with monitoring and evaluating all CoC funded projects to ensure compliance with program requirements, ensure programs are meeting performance measures set by the CoC, and take action against poor performers. The full responsibility of this committee is outlined below under “Annual Project Monitoring and Evaluation Process.”
- **CoC Project Selection Committee** (Formerly the “Prioritization Committee” for the Portland CoC. Formerly “Project Committee” for renewal projects and the “Selection Committee” for new projects for the Maine CoC.)

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– The CoC Project Selection Committee is comprised agencies and/or individuals with no direct interest in CoC-funded applications based on the CoC’s governance charter. This group is charged with reviewing new and renewal applications for CoC funding as well as ranking and scoring projects for the CoC application. The full responsibility of this committee is outlined below under “CoC Project Scoring.”

3. Process for Establishing Performance Measures

In order to strengthen the statewide system of care, the Portland and Maine CoCs will work jointly to establish performance measures. While *numerical targets* may vary between the Maine and Portland CoCs, or by project type or subpopulation, the *language* of the performance measures will be consistent across the CoCs.

A. Annual Performance Measures Meeting

A meeting will be held once annually to review, revise, add or discontinue performance measures, and to set numerical targets. This will be known as the Performance Measures (PM) Meeting. Performance measures may be set for just the upcoming year, for future years, or some combination of both (e.g. this may vary by performance measure.)

Each year participants at the PM Meeting will review and set targets for the performance measures by reviewing measures established by HUD for the CoC and ESG Programs, as well as those established through state and local plans to end homelessness. The CoCs may, at their discretion, add additional PM.

Performance measures should reflect, at minimum, progress towards the HEARTH Act’s system-level measures and Maine State system-level measures identified in the Plans to End and Prevent Homelessness, but those attending the PM Meeting may elect to establish additional performance measures.

The PM Planning Committee will be responsible for reviewing the most recent NOFA for changes to HUD CoC targets, as well as any changes to ESG targets, and furnish this information to participants in the PM Meeting.

To improve awareness of and participation in the PM Meeting, the CoCs will take the following steps:

- Hold the meeting in the same month every year
- Begin advertising the PM Meeting 90 days in advance
 - Post notices of the upcoming meeting on the Maine Homeless and City of Portland Social Services website
 - Send email blasts to members of the CoCs, the Regional Homeless Councils, and other related groups
 - Use social media, news releases, and other strategies to affirmatively reach out to a wide range of participants
- Make attendance at the CoC PM meeting a written requirement within the ESG program agreements
- Recommend that CoC leaders craft a standard email and present it to the CoC membership for review; this will be sent to stakeholders each year to advise them of the upcoming PM meeting
 - The email should strongly encourage attendance at the PM Meeting by organizations’ leadership as well as representatives from front-line staff
 - An 80% attendance record at CoC meetings will be required in order to vote on PM
 - This should be made a requirement within the contracts of ESG-funded projects
 - Recommend that the CoCs set up meeting topics for CoC meetings for the coming year so that stakeholders can target which to attend

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B. Planning the Performance Measures Meeting

The Portland and Maine CoCs will appoint members to a joint PM Planning Committee to plan and organize the PM Meeting (this committee will meet only 5 months during the year.) Planning will begin 120 days in advance of the PM Meeting.

The PM Planning Committee should include representatives from the Homeless Management Information System (HMIS) lead, emergency shelters, transitional housing, permanent supportive housing, rapid re-housing, outreach and CoC Steering Committee representatives. To the maximum extent possible, representatives should be people who are data-conversant. Membership in the PM Planning Committee should include 4-8 people.

In preparation for each year's upcoming PM Meeting, the PM Planning Committee should survey project recipients to collect their input on achievable targets in the upcoming year. This should be done via Survey Monkey in order to facilitate analysis of results. The survey should ask respondents to specify their program name, type, and population served. If needed, this could be piloted in the Portland CoC and then expanded to the Maine CoC.

The target audience for attendance at the PM meeting includes community leaders, emergency shelters, transitional housing (TH), permanent supportive housing (PSH), and rapid rehousing (RRH) programs serving the target populations of people who have or are experience homeless and may be Veterans, youth, family or victims of domestic violence, and those who may have a severe mental illness or substance abuse disorder. Staff from DHHS, MaineHousing, CAPs, and General Assistance programs are an additional target audience. To the maximum extent possible, representatives should be people who are data-conversant and have the ability to speak for their organization in setting PM and numerical targets.

HMIS data will be the primary source of information used to monitor aggregate project performance on the agreed upon measures; these and any new HUD performance measures will be reviewed at the annual PM Meeting. Aggregate project performance will be used as a basis for any revisions to the performance measure targets in the upcoming year(s). Detailed project-level performance may be provided at the meeting to help explain results and troubleshoot data quality issues. The HMIS lead will send ESG and CoC project recipients their individual project performance measures using HMIS data 120 days in advance of the PM meeting in order to give them time to resolve any data issues. Recipients will have 60 days to review and make corrections to program data before final reports are generated.

The HMIS Lead agency will provide the PM Planning Committee reports by program type for each performance measure that reflect the coverage rate by type of program and data quality. The PM Committee will review the reports 120 days before the meeting and 30 days before the meeting to ensure understanding about the reports' content and to resolve any data quality issues. Following this, the reports will be presented at the full PM meeting.

The PM Planning Committee will update the Performance Measure chart based on the decisions made at the PM Meeting and distribute the final version to all interested parties.

4. Annual Project Monitoring and Evaluation Process

Purpose

Monitoring how housing and services programs are performing provides CoCs with the information needed to improve the way resources are allocated and services are delivered. Monitoring is critical to being accountable in our efforts to end and prevent homelessness. It should also improve the continuum of care for individuals and families who are experiencing homelessness or are at risk of becoming homeless.

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Scope

This monitoring policy applies to CoC-funded projects.

Process

The CoC will monitor HUD McKinney-Vento funded programs to ensure compliance with both federal and local goals. A CoC Monitoring Committee will be established and will consist of **[insert proposed composition]**

Program performance will be assessed once a year and will occur in the fall, approximately during the month of October each year. The **[insert name of responsible party]** will maintain electronic and/or paper records of monitoring visits for at least 5 years.

Programs that do not meet the established threshold, and/or meet fewer than half of the performance standards, will be considered “programs of concern” and will be required to develop a 12-month action plan for improving performance in the substandard area(s). Programs of concern will be required to participate in quarterly progress meetings with the CoC Monitoring Committee. The meetings will assess their program’s progress toward implementing their 12-month action plans. The CoC Monitoring Committee will assess performance at the end of the 12-month period and determine if the programs are improving in the target areas, as well as assess performance in meeting local, state, and federal goals. If the CoC Monitoring Committee determines that program performance has not improved sufficiently then the program will be recommended to the greater CoC to be considered for possible funding reallocation or program repurposing during the local HUD McKinney-Vento NOFA cycle (beginning in 2015).

A. CoC Monitoring Committee

The CoC Monitoring Committee will oversee the processes and methodologies used to monitor projects that intend to apply for renewal McKinney Vento funding through the CoC.

The committee will be selected by nominations from the CoC. The CoC Monitoring Committee should include at least 5 people. The committee will use two tools to score projects: the Monitoring and Evaluation Form and the Monitoring Threshold Tool. The Monitoring and Evaluation Form will be completed by the CoC project recipient and reviewed by the CoC Monitoring Committee. The Committee will use the Monitoring Threshold Tool to designate an acceptable or unacceptable answer to each question.

B. Monitoring Process

The roles and responsibilities of the CoC Monitoring Committee are as follows:

1. Develop and refine the Monitoring and Evaluation Form, and the methodology used to monitor and evaluate ongoing program performance.
2. Determine an annual threshold score and present to CoC for approval.
3. Present the Monitoring and Evaluation Form for approval by the Portland CoC and Maine CoC prior to the start of the monitoring process.
4. Once approved by the two CoCs, provide the Monitoring and Evaluation Form to all projects currently receiving CoC funds, along with a request for the project’s most recent APR.
 - a. Send the notice of the monitoring and requirements for completion via e-mail to the contact person of record and the CoC project Executive Director.
5. Review all monitoring returns and determine if each program has adequately responded to each of the monitoring questions.
 - a. If members think that an answer is acceptable they will assign a "1" to the corresponding box in the Monitoring Threshold Tool table.

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- b. If members think that an answer is not acceptable, they will assign a "0" to that box
 - c. The CoC Monitoring Committee will create written criteria and submit for approval to the CoC to make it clear when to assign a 1 or 0.
6. Notify projects by email of their deficiencies within 14 days of submission deadline and provide 14 days to respond with additional information.
- a. The email address used will be the email written on the front of the Monitoring and Evaluation Form with a copy to the project Executive Director.
 - b. Projects will be given one opportunity to correct or amend their monitoring returns in order to address any deficiencies found by the Committee.
 - c. The Committee will then meet again to decide if any new information provided adequately answers the question or addresses the deficiency, and will amend the table accordingly.
7. Provide a one-year probationary period for projects that fail to meet the threshold.
- a. Projects will be required to demonstrate improvement in that area during the probationary period.
 - b. The CoC Monitoring Committee will also offer and/or refer agencies to appropriate assistance and training if available.
 - c. Deficiencies may be addressed through staff training and/or program policy changes.
8. Provide all monitoring results to the CoC Project Selection Committee.

C. Monitoring Timeline

1. All projects will be monitored annually during the fall.
2. After the first year of monitoring the CoC will move to a biennial monitoring schedule.
3. To the maximum extent possible the monitoring review work will be split evenly across two years. All projects that meet the threshold score during the first year will be placed in a lottery for random assignment to an even or odd year monitoring schedule. When possible, agencies with multiple projects will be monitored in the same year.
4. The project monitoring schedule will be kept by **[insert name of responsible party]** and be made available as requested by projects and interested parties.
5. A project will have 2 weeks to respond in writing to the monitoring committee request.
6. The CoC Monitoring Committee will have 2 weeks to review and request additional information from projects.
7. The projects will have 2 weeks to submit additional information requested by the CoC Monitoring Committee.

D. Monitoring Threshold Criteria

PROJECT DESCRIPTION

- Project Summary
 - Brief narrative description
- Assistance provided to obtain permanent housing
 - Brief narrative including process to access mainstream resources, increase income level and obtain and maintain housing stability
- Budget
 - Eligible budget line items and recent budget approved by HUD

AGENCY POLICY AND PROCEDURE

- Participation of not less than one homeless individual or formerly homeless individual on the board of directors, or other equivalent policy making entity of the recipient or subrecipient
 - Provide policy and proof of implementation such as Board minutes, affidavit by Board or Executive Director, etc.
- The agency involves homeless individuals and families through employment, volunteer services, or otherwise in constructing, rehabilitating, maintaining, and operating the project and in providing support services for the project.

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- Provide policy and procedure
- Conflict of Interest Policy
 - Provide policy and procedure

COC PROGRAM POLICY AND PROCEDURE

- Homelessness and chronic homelessness verification method and current eligible homeless situation
 - Provide applicable program policy and any standard program forms
- Disability verification method (if applicable to program admission criteria)
 - Provide applicable program policy and any standard program forms
- Housing Quality Standards Inspection Policy (all projects except SSO)
 - Provide policy
- McKinney-Vento Homeless Education Assistance Act Policy
 - Provide policy and/or job description

PROJECT DATA

- Utilization Rate
 - Provide most recent APR
- Percent of participants employment at program exit
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants exiting with increased income
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants exiting with increased mainstream benefits
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants moved from transitional housing to permanent housing
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants remained or exited to permanent housing
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting

HMIS

- Participation in HMIS
 - Verify participation in HMIS or a comparable database for victim services provider or a legal services provider
- UDE Data Completeness Grade
 - Provide report
- DKR Grade
 - Provide report

CONTINUUM OF CARE

- CoC participation
 - Self-report meeting attendance

E. ESG Monitoring Recommendations

- The CoC will work together with recipients of ESG funds to discuss what performance measures the CoC will be evaluating. The ESG recipients will measure their performance as well as that of their subrecipients.
- In accordance with the HEARTH Act, age and gender of a child under 18 should not be used as a basis for denying any family's admissions to an ESG program

ESG Project Performance

- Utilization Rate
 - Bed night report
- Percent of participants exiting with increased income
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants exiting with increased mainstream benefits
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting
- Percent of participants exited to permanent housing
 - Performance goal for this measure is based on the approved target set at the annual PM Meeting

HMIS

- Participation in HMIS
 - Verify participation in HMIS or a comparable database for victim services provider or a legal services provider
- UDE Data Completeness Grade
 - Provide report
- DKR Grade
 - Provide report

F. Program Performance Results

All data generated for the Monitoring and Evaluation Form will be drawn from the HMIS, the Annual Performance Report (APR), data from providers, the local HUD Field Office, or from sign-in sheets collected at Continuum of Care meetings. CoC members will work with the project and the HMIS Lead Agency to obtain the necessary data to complete the Monitoring and Evaluation Form. CoC staff will inform providers of deadlines to submit data.

Results will be distributed to projects and aggregate program-level results will be shared with the CoC membership during CoC meetings.

Programs that fail to meet standards will be given one year to cure. If they fail to do so within one year from when the monitoring took place, the CoC Monitoring Committee will recommend to the CoC Project Selection Committee and the full CoC that the project's CoC funding be reallocated. The CoC full membership will vote on recommendations from the CoC Monitoring Committee to reallocate project funding. Projects that are approved for reallocation will be notified in writing by the CoC.

At this time results will not be posted to the Maine Homeless Planning website, Portland CoC website or distributed electronically to full membership. Each CoC will review the publishing procedure by May 2016 to determine if changes need to be made.

5. CoC Project Scoring and Ranking

A. Request for Proposal Process

If new project funding is available, the CoC will advertise this and make applications available on its website and via distribution lists for stakeholders and potential applicants. The CoC will encourage organizations to share the application package with any organization that might be interested in applying, including entities that may be less likely to be aware of the funding or that have not previously applied.

A workshop will be scheduled to provide information regarding the application process and other HUD requirements; again, this will be advertised widely using websites, distribution lists, and other means. Existing CoC

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members may agree to meet with potential applicants to provide technical assistance regarding funding, the development process, match requirements, CoC processes & participation.

Applicants will be required to submit their proposals by a specific date and time noted in the application materials. Failure to submit by the deadline will result in disqualification from the competition.

B. CoC Project Selection Committee

The CoC Project Selection Committee will consist of agencies and/or individuals with no direct interest in CoC-funded applications. This committee will consist of between 5-8 members and must be willing and able to commit the time and effort required to fulfill the duties of this committee. Members of this committee will review, score, and rank all project applications, renewal and new if applicable, based on a CoC-approved scoring tool. The CoC will provide information and materials to all committee members to familiarize them with the purpose and responsibilities of the committee. Applications, scoring templates and all other relevant materials will be given to the CoC Project Selection Committee members to review prior to scoring. The CoC Project Selection Committee will review and finalize the criteria and protocols used to score and rank new and renewal projects seeking funding through the CoC.

See Governance documents for the selection process in each CoC.

The CoC Project Selection Committee will:

1. Develop and refine the scoring templates, methodology and protocols used to score and rank new and renewal project applications seeking inclusion in the COC annual application to HUD.
2. Work closely with other CoC committees to determine appropriate criteria for the separate scoring templates for new, renewal and HMIS project applications based on priorities established by COC and by HUD.
3. Establish a list of protocols and a set of instructions to be provided to the CoC Project Selection Committee.
4. Present the scoring templates, protocols and instructions to the CoC for approval. Copies of the approved forms will be provided to the CoC Project Selection Committee and to all new, renewal and HMIS project applicants prior to **the application** and selection process.

C. New Projects Scoring Process

If funding is available for new projects, new programs will be required to submit their proposed applications through the RFP process outlined by the CoC. Once proposals have been received (as outlined above), each new project applicant shall give a brief project presentation, including a question and answer session, to the CoC Project Selection Committee. At the conclusion of the presentation the CoC Project Selection Committee will have the opportunity to discuss the application, and then proceed to scoring. All new projects shall be scored based on their application and the project presentation, using the approved CoC Project Rating Form for New Projects. Ranking of applications will be based on the average scoring results and adjusted as appropriate to address CoC and HUD priorities, and to maximize potential funding.

D. New Project Scoring Criteria

New projects will be scored using the following criteria. These criteria are subject to change pending review and approval by the Project Selection Committee and the CoC.

- Housing Emphasis/Type of Program
- Experience and Capacity
- Target Homeless Population
- Leverage
- HMIS utilization
- Administration

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E. Renewal Projects Scoring Process

Projects seeking renewal through the CoC will be required to submit their applications through the RFP process determined by the CoC. Each renewal project applicant may be asked to give a brief project presentation, including a question and answer session, to the CoC Project Selection Committee. At the conclusion of the presentation the CoC Project Selection Committee will have the opportunity to discuss the application, and then proceed to scoring. If applicants are not required to present, the Committee will discuss the score based on the written application alone.

All renewal projects shall be scored based on their application and the project presentation, if applicable; using the approved CoC Project Rating Form for Renewal Projects. The CoC Project Selection Committee will also consider any recommendation from the CoC Monitoring Committee based on results of any monitoring findings that occurred during the renewal program's monitoring evaluation.

F. Renewal Project Scoring Criteria

Renewal projects will be scored using the following criteria. These criteria are subject to change pending review and approval by the Project Selection Committee and the CoC, and should be modified annually to reflect changes in HUD CoC funding priorities, as well as priorities established by the CoCs and the local and state plans to end and prevent homelessness.

- Housing Emphasis/Type of Program
- HMIS Data Quality & APR
- Performance
- Target Homeless Population
- Leverage
- Administration

G. Ranking Process

Ranking of applications will be based on average scoring results, and adjusted as appropriate to address COC and HUD priorities and to maximize potential funding. After scoring and ranking all new and renewal projects, the CoC Project Selection Committee will present its recommendations for renewals and any new projects to the full CoC.

H. Appeals Process

Applicants who believe they were denied the right to reasonably participate in the local application process, or that a decision made by the CoC Project Selection Committee regarding the scoring, ranking, rejection, or funding of their project was prejudicial, unsubstantiated by project performance, or in violation of the CoC Governance Charter or Performance Monitoring and Evaluation Policies and Procedures, may file an appeal to be re-considered for inclusion in the CoC application.

A written appeal must be submitted to the CoC Project Selection Committee within five business days of the notice of the decision. All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed. The decision of the CoC Project Selection Committee will be final.

The CoC Project Selection Committee will hear all appeals. It is the responsibility of the applicant to address each area(s) identified as a factor(s) of the funding decision in a manner that could result in a more favorable decision. The role of the CoC Project Selection Committee is to read and review only those areas of the application that are being appealed.

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Project Scoring Timeline

Include due dates/ party responsible and appeal procedure

Establish timeframes that can then be converted to dates each year

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