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

# **Overview**

The federal Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program interim rule requires project‐ level 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 identify poor performers for technical assistance or further action.

This document establishes the process by which the CoC will:

* Set annual performance measures and targets in consultation with the COC Board;
* Monitor CoC and ESG recipient performance;
* Evaluate and report outcomes;
* Provide technical assistance to poorly performing projects; and
* Identify poor performers for technical assistance or further action

Note: 24 CFR 578.7(a)6

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.

**2. Relevant Committee Overview**

* **The COC Steering Committee –** The COC Steering Committeeis comprised of the COC Tri-Chairs and Chairs of all Committees. For Monitoring and Evaluation, the Steering Committee will coordinated with the COC Board to set and implement i priorities, performance measures, targets, and follow up for low performing projects. The COC Steering Committee will be responsible for facilitating the Annual Performance Measure discussion which will be on the first COC meeting after the NOFA is released. Additional responsibilities of the COC Steering Committee is outlined below under “Process for Establishing Performance Measures.”
* **COC Projects, Monitoring, and Template (PMT) Committee -**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 to notify the Steering Committee for low-performing projects. This information is reported to the Steering Committee who, along with the full MCOC, are responsible for identifying poor performers for technical assistance or further action. The full responsibility of this committee is outlined below under “Annual Project Monitoring and Evaluation Process.”

This Committee also creates the scoring tools that are used by the Selection Committee to score and evaluate projects applying for COC funding. The template incorporates priorities, performance measures and targets identified by the Steering Committee and approved by the full COC.

* **CoC Project Selection Committee** **-** 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.”
* **Data Committee and HMIS Advisory Council** – Reviews data for the Point In Time, Housing Inventory Chart, and AHAR. They also inform performance measurement by providing reports by program type for each measure that reflect the coverage rate by type of program and data quality.

# **3. Process for Establishing Performance Measures**

In order to strengthen the statewide system of care, the COC Board of Directors will work with the CoC to establish priorities and performance measures.

1. **Annual Performance Measures Discussion**

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) Discussion. 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.)

The Discussion will begin at the COC Board of Directors who will coordinated with the Steering Committee Meeting following the release of the NOFA in preparation for discussion at the full COC meeting immediately following.

At the Steering Committee meeting, the group will review and set targets for the performance measures by reviewing measures established by HUD for the CoC and ESG Programs, local targets may also be established through state and local plans to end homelessness. The Projects, Monitoring, and Template Committee will present their recommendations. This information will then be discussed at the full COC immediately following. The CoC and the COC Board of Directors may, at their discretion, add additional targets.

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 Performance Measurements Meeting may elect to establish additional targets.

The Steering 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 full COC Meeting and COC Board of Directors.

To improve awareness of and participation in the Performance Measures Discussion the CoC, in collaboration with the Collaborative Applicant, will take the following steps:

* Hold the meeting in the COC meeting immediately following the release of the NOFA each year.
* Advertise the Performance Measurements Discussion
  + Post notices of the upcoming meeting on the Maine Homeless Planning Website
  + Use social media, news releases, and other strategies to affirmatively reach out to a wide range of participants
* Recommend that CoC leaders draft a Notice and present it to the CoC membership for review; this will be posted for stakeholders each year to advise them of the upcoming PM Discussion
  + The Notice should strongly encourage attendance at the Performance Measurements Discussion by organizations’ leadership as well as representatives from front-line staff
  + Recommend that the CoC set up meeting topics for CoC meetings for the coming year so that stakeholders can target which to attend

1. **Planning the Performance Measures Discussion**

In order to maximize attendance at the Performance Measures Discussion, the MCOC will set aside the Big Thinking Topic of that month and dedicate it toward the Performance Measures Discussion. To ensure the annual habit of utilizing the Big Thinking Topic toward Performance Measures in the MCOC meeting immediately following the release of the NOFA- this must be approved by the COC and part of their charter, policies and procedures, and calendar.

The target audience for attendance at the Performance Measurements 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 (additional data may be supplemented sources for specific populations or regions); 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 Advisory Council/ Data Committee will provide the COC Board reports by program type for each performance measure that reflect the coverage rate by type of program and data quality.

# **Annual Project Monitoring and Evaluation Process**

***Purpose***

Monitoring how housing and services programs are performing provides the CoC 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.

***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. The CoC Projects, Monitoring, and Template Committee will monitor all funded COC projects and provide the monitoring results to the Steering Committee for review. Results may be posted on the Maine Homeless Planning website.

Monitoring tools are reviewed annually by the Steering Committee. Once reviewed and approved it is submitted to the COC for full approval. Based on the information provided the Tool evaluates the annual APR’s, and COC and Committee attendance.

Programs that do not meet the established Performance Threshold Score, and/or meet fewer than half of the performance standards, will be considered “programs of concern.” Projects will be required to develop an action plan for improving performance in the substandard area(s) that will be submitted to the COC Steering Committee Chairs by the following meeting. The Steering Committee will then discuss the project, review and approve or reject the plan, and assign technical assistance as needed.

1. **CoC Projects, Monitoring, and Template (PMT) Committee**

The CoC Projects, Monitoring, and Template 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 comprised of members from the CoC**.** The CoC Projects, Monitoring, and Template Committee should include at least 5 people. The committee will use several tools including: 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 PMT Committee. The Committee will use the Monitoring Threshold Tool to designate an acceptable or unacceptable answer to each response which will result in a Project Monitoring Threshold Score which will be forwarded to the MCOC Steering Committee for Review and Action as necessary.

1. **Monitoring Process**

The roles and responsibilities of the CoC Projects, Monitoring and Template 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 to the Steering Committee and the COC. Once approved, the Monitoring and Evaluation Form will be provided to all projects currently receiving CoC funds.
4. Each project is responsible for submitting their most recent APRs and monitoring forms to the Project Monitoring Committee within 30 days of submitting them to HUD. This protocol is outlined on the Maine Homeless Planning website.
5. Review all monitoring returns and determine if each program has correctly responded to each of the monitoring questions.
   1. If an answer is acceptable they will assign a "1" to the corresponding box in the Monitoring Threshold Tool table.
   2. If an answer is not acceptable, they will assign a "0" to that box
6. Notify projects by email of their deficiencies and give them the opportunity to respond with additional information within an identified time frame.
   1. 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 and other agency designees.
   2. Projects will be given one opportunity to correct or amend their monitoring returns in order to address any deficiencies found by the Committee.
   3. The Committee will then meet again to decide if any new information provided correctly answers the question or addresses the deficiency, and will amend the table accordingly.
7. Present all monitoring results, including identification of the low-performing projects, to the MCOC Steering Committee. Information is also provided to the Selection Committee and the designated Collaborative Applicant lead.

Additional Responsibilities During NOFA

1. During NOFA COC PMT Committee review the NOFA for updated information needed for project evaluation. If necessary:
   1. Design a means to collect additional information as required by the NOFA and get approval from COC Steering Committee for any additional forms.
   2. Collect desired project information.
   3. Amend Monitoring Threshold Scoring Template to include additional information.
   4. Review Monitoring Threshold Form to ensure it includes all required projects
2. Submit a Monitoring Threshold Score Template to the MCOC Steering Committee for review and approval.
3. Respond to questions and clarification regarding Performance Threshold Scores.

The roles and responsibilities of the COC Steering Committee are as follows:

1. Receive and review the Monitoring results submitted by the PMT Committee.
2. Notify low performing projects of their score and request a corrective action plan to be presented to the next Steering Committee meeting, and assign technical assistance as necessary.

Additional Responsibilities During NOFA

1. Receive and approve the Monitoring Threshold Score Template from the COC PMT Committee.
2. Inform all projects whether they will be forwarded to the Selection Committee.
3. **Monitoring Timeline**
4. All projects will be monitored annually at the time of their submitted APR. Once reviewed, a project will have 2 weeks to respond in writing to the PMT Committee request for clarification or additional information.
5. During the NOFA, the PMT Committee will meet to review all submitted APRs and request additional information where necessary. The projects will have 2 weeks to submit additional information requested by the CoC Monitoring Committee.
6. **Monitoring Threshold Criteria**

PROJECT DESCRIPTION

* Project Summary
  + Brief narrative description
  + Define eligible populations and project
* 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

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 Section okay % targets set by steering after review of NOFA and MECOC priorities.

* Utilization Rate
  + Provide most recent APR
* Percent of participants employment at program exit
  + Performance goal for this measure is established by HUD
* 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 (confirmed by meeting attendance roster from Collaborative Applicant)

1. **ESG Monitoring Recommendations**

* ESG funders will establish performance measures and which is approved by the COC

ESG Project Performance

* Utilization Rate
  + Bed night report
* Percent of participants exiting with increased income
  + Performance goal for this measure is established by HUD
* 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

1. **Program Performance Results**

All data generated for the Monitoring and Evaluation Formwill be drawn from the HMIS, the Annual Performance Report (APR), data from providers. CoC members will work with the project and the HMIS Lead Agency to obtain the necessary data to complete the Monitoring and Evaluation Form. All Monitoring information will be submitted to the PMT Committee within 30 days of APR submission.

Monitoring Threshold Performance Score 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 no more than one year to cure. If they fail to do so within one year from when the monitoring took place, the Steering Committee will recommend to the CoC that the project’s CoC funding be reallocated. The CoC full membership will vote on recommendations from the PMT Committee to reallocate project funding. Projects that are approved for reallocation will be notified in writing by the CoC.

# **CoC Project Scoring and Ranking**

1. **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.

The COC and/or CA will post the information relative to the NOFA on the Maine Homeless Planning website. This will provide information regarding the application process and other HUD requirements for submitting applications for funding. This information will be advertised widely using websites, distribution lists, and other means to reach greater audiences. Existing COC 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.

1. **CoC Project Selection Committee**

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 new and renewal project applications based on a CoC-approved scoring tools. 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 the presentation and final scoring of new applications. The CoC - will review, finalize and approve the criteria and protocols used to score and rank new and renewal projects seeking funding through the CoC prior to NOFA deadline.

See Governance documents for the selection process in the CoC.

The CoC Selection Committee will:

1. 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 implement COC Scoring criteria using the approved scoring templates for new and renewal project applications based on priorities established by COC and by HUD.
3. Once new and renewal projects are scored and ranked, the Selection Committee will provide each project score back to the CA for review and tiering, as established by HUD, which will then be forwarded to the CoC for review and approval to be included in the application submission.
4. **New Projects Scoring Process**

If funding is available for new projects, new projects will be required to submit their proposed applications through the HUD Application process outlined by the CoC. All new projects shall be scored based on their application, using the approved CoC Project Scoring templates and established Selection and ranking process. Ranking of applications will be based on the scoring results and adjusted as appropriate to address CoC and HUD priorities and to maximize funding by the CoC during the ranking approval process.

1. **New Project Scoring Criteria**

New projects will be scored using the COC established criteria and priorities which are created and based upon the COC and HUD established priorities and which are reflected in the approved Scoring Tool.

1. **Renewal Projects Scoring Process**

Projects seeking renewal through the CoC will be required to submit their applications through the HUD renewal process determined by the CoC. Each renewal project applicant will be asked to provide materials through the monitoring process which will be used and incorporated into the Monitoring Threshold Template.

Through the monitoring process the renewal project applicants will have opportunity to present and clarify info with the PMT Committee. The Monitoring Information along with the application, will then proceed to the Selection Committee. The Selection Committee will score the application based on the written application and monitoring materials using the approved Scoring Tool.

All renewal projects shall be scored based on their application and monitoring results and review. The monitoring review will result in a Monitoring Performance Score which will be tracked in the Monitoring Threshold Template. The CoC Selection Committee will score the renewal project per the approved scoring template tool as noted above using the Information in the Monitoring Threshold Template, Monitoring Performance Score and the Application.

1. **Renewal Project Scoring Criteria**

Renewal projects will be scored using the COC established criteria and priorities which are created and based upon the COC and HUD established priorities and which are reflected in the approved Scoring Tool.

1. **Ranking Process-Donna please review. I added but did not delete.**

Both New and Renewal projects will be Scored by the Selection Committee. The Selection Committee will forward project scores to the Steering Committee and CA for final ranking. Ranking of applications will be based on 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 Steering Committee and Selection Committee will present its recommendations for renewals and any new projects for funding to the full CoC.

1. **Appeals Process**

Appeals will follow the COC appeals process as outlined in the Governance Document. COC Article 10: Appeals Process.

Project Scoring Timeline

Dates and timelines are established in conjunction with the COC and CA based on the Release of the NOFA.

**Addendum**

**For the FY17 NOFA, a tool separate from the APR can be used for the monitoring process due to established known issues with SAGE.**