

2025 CoC Monitoring Policy

South Dakota Housing for the Homeless Consortium

SD-500 Statewide Continuum of Care (CoC)

The South Dakota Housing for the Homeless Consortium (SDHHC) is SD-500 Statewide CoC and establishes project and system performance goals for the CoC and conducts monitoring of program performance for all CoC and YHDP funded projects. The CoC Interim Rule § 578.7 (7) states that the *“Continuum of Care must Consult with 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.”* HUD, HUD OIG, and Comptroller General of the US, or any of their authorized representatives must have the right of access to all CoC program records and documentation of the recipient and subrecipient per 24 CFR Part 578.103(d)).

Additionally, projects are required to monitor their own performance on a regular basis. This should include completing and submitting quarterly data quality reports based upon the requirements listed in *SDHMIS Data Quality Plan* to help ensure that they are meeting data quality and other goals established by the CoC. Projects should also complete self-monitoring activities to verify appropriate documentation is being maintained. Recipients are encouraged to develop and carry out actions that address any low-scoring categories from previous years’ competitions. All CoC and YHDP projects should be aware of their projects’ impact on the CoC System Performance Measures and work to improve that impact.

The purpose of monitoring visits is to ensure that CoC funded programs are compliant with HUD regulations. However, these visits are also conducted to aid performance and provide technical assistance for service delivery or the administrative components of projects. Completing visits on-site helps identify any potential fraud, waste or abuse. The monitoring visits are also meant to foster a systems approach and reinforce the value of teamwork. Monitoring goals include helping projects to understand and follow requirements, help projects prepare for any HUD monitoring, reduce the risk of funding being recaptured by HUD, and identify areas for training and technical assistance. The monitoring activities are completed by the CoC Lead Agency, South Dakota Housing Development Authority (SDHDA), CoC Administrator and in coordination with the Performance and Ranking Committee (PRC). Monitoring policies are reviewed and approved by the PRC annually.

Monitoring Activities

1. Project Documentation
 - a. APR & HMIS Participant Records
 - i. CoC Administrator will obtain and review the latest APRs from SAGE.
 - ii. Project’s HMIS DQRs will be reviewed. Project data may be run through EVA to assess other aspects of data quality.
 - iii. CES records and referrals related to any participants may be reviewed.
 - b. CoC Application, Project Admin Plan and other relevant Policies and Procedures
 - i. CoC Administrator will review the most recently submitted CoC application and all accompanying documents. If an agency has updated their Policies and Procedures since their CoC Competition submission, they may submit updated documents prior to the on-site monitoring visit.
2. Participant File Review

- a. CoC Administrator will choose participant files at random to review while conducting a site visit. Projects will be notified of these selections 1 week prior to visit. How many participant files are to be reviewed will depend on time available and the size of the project. To ensure privacy and security of participant info, program staff will deliver original participant files to the CoC Administrator who will then review these files in private. Once the participant file review is complete the CoC Administrator will deliver the participant file back to project staff to be secured in accordance with project procedures. No participant identifying information will be written on scoring sheets to protect participant confidentiality.
 - i. Participant files to be reviewed aim to be a comprehensive sample of different household types, length of enrollments and different outcomes.

3. Financial Review

- a. CoC Admin will request a full LOCCs draw history for the most recently completed Period of Performance. One draw will be selected for review as well as all cash match documentation.

Monitoring Process

CoC Administrator will communicate with program leadership to determine the best time for a monitoring visit to occur. This communication will happen at least one week in advance to allow for the project to gather necessary documents and assign a contact person.

The CoC Administrator and any other SDHHC representatives will arrive at the project at the scheduled time and conduct an entrance interview. The entrance opportunity will be used to discuss project updates, past monitoring and competitions and any questions that came from reviewing

CoC Administrator will utilize a standardized scoring sheet to determine how many points each agency will receive overall. Not all project types have the same available points so the results will be viewed as a percentage. After reviewing documents and calculating score, the CoC Administrator will conduct a brief exit interview with the project's lead staff member to go over any questions or items needing further clarification. A follow-up letter detailing monitoring results will be drafted and sent to agency leads within 30 days. The CoC Administrator will also provide this letter to the CoC Governing Board the Policy and Advisory Committee or PAC.

Monitoring could result in concerns or findings.

- Concerns are deficiency within a project's operations that will result in a finding if the concern is not corrected by the requested date in the Corrective Action Plan.
- Findings are deficiencies within a project's operation that are based in material noncompliance with a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized. Findings may be immediately reported to the local field office. Items need not be listed in the monitoring rubric to be grounds for concerns or findings.

When this occurs, the project will be provided with a Corrective Action Plan. Corrective Action Plans will outline the specific concerns/findings, the actions the project must take to remedy them, and a timeline for that work to be completed. Projects that fail to respond to proposed corrective action plans, or fail to reply within the designated time frames, and are not able to demonstrate compliance may be subject to any of the available remedial actions or sanctions outlined by 24 CFR part § 578.107.

Ultimately, if the results of the monitoring visit indicate that the agency has scored an 86% or higher, onsite monitoring visits will occur on a two-year basis. If the agency scores lower than 86% monitoring visits will occur annually. And if an agency scores below 60% on the monitoring scoring tool, the agency will be subject to monitoring visits at the discretion

of the CoC Administrator with consultation from the PRC. In cases where an agency sponsors multiple projects an average of all projects will be used in these calculations.

Outline of the Monitoring Visit Process:

1. Notification of Project
 - a. Confirm date, time, scope
2. Entrance Conference
 - a. Meet on-site with agency contact person
 - b. Clarify purpose & scope, discuss any questions or concerns that arose from Project Documentation activity.
3. Documentation, Data Acquisition, and Analysis
 - a. Records are kept of information reviewed and steps followed
4. Exit Conference
 - a. Present preliminary results of monitoring
 - b. Provide an opportunity to correct any misconceptions or misunderstandings
 - c. Provide opportunity to report on steps taken to correct deficiencies
5. Monitoring Results and Corrective Action Plans
 - a. Recognize positives and any areas of improvement
 - b. Identify any concerns or findings
 - c. Specify corrective actions, if there are findings
 - d. Make recommendations for improvement if there is a concern
 - e. Include deadlines for; 1. Providing a written response that describes how any findings will be resolved. 2. Correcting each deficiency identified in the letter.
 - f. Letters with monitoring results will be emailed within thirty days of monitoring.