



# WI BOSCOC Monitoring Policy

This policy outlines the monitoring process for the Wisconsin Balance of State Continuum of Care (WI BOSCOC).

## Purpose for Monitoring

The HUD COC Interim Rule states that Continuums of Care (COC) are responsible for monitoring recipients [24 CFR 578.7]. Monitoring provides information to assure that recipients are using COC funds efficiently and effectively in accordance with federal law, HUD federal guidelines and standards established by the COC. The WI BOSCOC will conduct monitoring to also provide assistance on performance and technical areas in the delivery of services to the homeless population in their communities. Monitoring also gives an opportunity to identify possible fraud, waste and abuse and to make certain federal funds are being used as intended.

In accordance with an agreement between WI BOSCOC and WI Division of Energy, Housing and Community Resources (DEHCR) the WI BOSCOC staff will also collaborate on monitoring and evaluation of EHH projects in the WI Balance of State COC. This agreement allows for joint and concurrent monitoring as well as sharing information related to the monitoring.

## Definitions

**Concern** - A deficiency in program performance not based on a statutory, regulatory or other program requirement. Sanctions or corrective actions are not authorized for concerns. However, the WI BOSCOC will bring the concern to the agency's attention and, if appropriate, may *recommend* (but cannot require) actions to address concerns and/or provide technical assistance.

**Finding** - A deficiency in program performance based on a statutory, regulatory or program requirement for which sanctions or other corrective actions are authorized.

**On-site monitoring** - Monitoring that is conducted at the agency location. This monitoring includes review of forms and supporting documentation along with staff interviews. Unit inspections and participant interviews are also conducted during an on-site monitoring.

**Desk monitoring** – Monitoring that is conducted remotely, typically at the office of the Monitoring and Compliance Coordinator. All forms and supporting documentation will be submitted via electronic mail, or postal service if requested.

## Approach to Monitoring

The monitoring process is intended to provide guidance and assistance along with observing progress and quality of services. The monitoring process should have open communication and on-going evaluation to make the process successful.

The overriding goal of monitoring is to determine compliance, prevent/identify deficiencies and design corrective actions to improve or reinforce project performance. We also want to acknowledge the



efforts and good practices that agencies have and share with other agencies in the WI BOSCO to increase success for all agencies and communities in the continuum.

### Monitoring Timeline

It is the intent of the WI BOSCO to conduct monitoring for every agency that has a COC funded project on a two-year cycle.

This does not preclude a monitoring to be triggered to occur more frequently. In the event the WI BOSCO has reason to believe a monitoring should occur sooner than the two year cycle, monitoring staff will give notice to that agency. Events that would lead to a monitoring include: complaints or grievances filed with the WI BOSCO, poor system performance measures, annual funds being relinquished to HUD or any reason to believe there is misuse of federal funds, results from State HP monitoring, reports of concern from WI Division of Energy, Housing and Community Resources or Institute for Community Alliances (ICA). WI BOSCO will communicate with the agency the concerns leading up to the monitoring and the monitoring could be focused on those activities and/or area(s) of concern or could lead to a full monitoring.

When a monitoring will occur, the WI BOSCO will issue a notice to the agency at least 30 days prior. The notice will be addressed to the Executive Director and will also include the Program Manager and sent via electronic mail. The notice and monitoring packet are sent to the agency in order to prepare for the monitoring. The agency is responsible to submit all required documents based on the following timeline:

- On-site Monitoring - The WI BOS Monitoring Form must be submitted to the Monitoring and Compliance Coordinator no later than seven (7) days prior to an on-site visit. All supporting documents need to be prepared and ready at the start of the on-site monitoring. Unless requested, supporting documents should not be submitted via electronic mail. In the event that an agency has multiple COC projects being monitored, a monitoring form MUST be filled out for each project as each project is monitored separately. Any documents submitted after the deadline will result in a finding.
- Desk Monitoring – All documents, including supporting documentation must be submitted by the timeline indicated in the monitoring notice. Submission can occur through electronic mail or by postal mail. Please note that postal mail must be post-marked by the due date in the monitoring notice.

On the day of the on-site monitoring, all paperwork must be prepared and presented to the Monitoring and Compliance Coordinator upon their arrival. If all paperwork is not presented, this will result in a finding. All documents should be labeled and presented in the order asked on the monitoring form. During the monitoring program staff should be available to answer questions. Program staff includes: program directors, case managers and any direct line staff. Staff from the finance department should also be available to answer additional questions that may arise during review of the financial portion of the monitoring. On-site monitoring will also include unit visits as well as meeting with project participants.



At the conclusion of the monitoring, WI BOSCO staff will meet with agency staff for an exit interview that will provide a summary of the information reviewed during the on-site visit. The interview will consist of initial findings and concerns, discuss successes and answer any additional questions. Further review of materials will be conducted after the on-site monitoring and communication will remain open if additional concerns arise throughout the entire monitoring process.

### Monitoring Response Letter

Upon completing the review of all forms and documents, the Monitoring and Compliance Coordinator will write up a letter describing the results. This correspondence will be sent to the Executive Director and Program Manager via electronic mail. This letter will address any findings that will need corrective action. The agency will have 30 days to respond to address and correct the findings. If there is a hardship, the agency may request an extension to the 30 days, no longer than an additional 30 days. WI BOSCO staff may request an on-site follow-up as part of the corrective action process. This follow-up must be within the 30 day timeline for response. Agencies are responsible for contacting the Monitoring and Compliance Coordinator to schedule this follow-up.

When all corrective actions have been addressed and implemented the findings will be considered resolved. In the event an agency does not respond or the findings are unresolved, the COC Director will inform the Balance of State Directors. The Balance of State Board of Directors will issue a letter to the agency which may include sanctions such as non-eligibility to renew the project application in the following competition. Monitoring reports will be shared with the grantor of funds, including but not limited to the HUD Milwaukee Field Office or State of Wisconsin.