

TUCSON PIMA COLLABORATION TO END HOMELESSNESS PERFORMANCE EVALUATION AND MONITORING PROCEDURES

APPROVED APRIL 23, 2019. REVISED APRIL 27, 2021

PURPOSE	To define program evaluation and monitoring activities conducted by the Tucson Pima Collaboration to End Homelessness (TPCH) to assess performance of recipients and subrecipients of HUD Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funds and to make recommendations to the TPCH Board of Directors and ESG recipients regarding performance concerns and funding allocation.
SCOPE	Recipients and subrecipients of CoC Program funds, recipients and subrecipients of ESG Program funds.
AUTHORITY FOR PROCEDURE	Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Code of Federal Regulation (CFR) for the CoC Program 24 CFR Part 578 and the Emergency Solutions Grant Program 24 CFR Part 576, Subpart G Grant Administration, and the Office of Management Budget (OMB) to include OMB Guidance for Grants and Agreements 2 CFR 200; Audits of States, Local Government and Non- profit Organizations 24 CFR Part 85,

1. DEFINITIONS

- 1.1. **Collaborative Applicant/CoC Lead Agency** is defined to mean an instrumentality of state or local government, nonprofit, state, or public housing authority that has been designated by the Continuum of Care to collect the required application information from all projects within the geographic area of the Continuum and apply for a grant.
- 1.2. **Recipient** is defined to mean a non-federal entity that signs a grant agreement with the U.S. Department of Housing and Urban Development (HUD), as defined in 424 of the McKinney-Vento Act.
- 1.3. **Subrecipient** is defined to mean a non-federal entity that receives a subaward from a primary recipient to operate all or a portion of a HUD-funded project.

2. OVERVIEW OF TPCH PERFORMANCE EVALUATION & MONITORING ACTIVITIES

- 2.1. **Monitoring Philosophy:** TPCH undertakes CoC grant recipient and subrecipient monitoring, as well as Emergency Solutions Grant (ESG) performance evaluation, for the purpose of optimizing performance and community benefit at both the project and system levels, as well as to fulfill the duties prescribed in 24 CFR Part 578 Subparts 7(a)(6) and 7(a)(7). Performance evaluation and monitoring activities are designed to promote compliance with federal and local requirements, support continuous quality improvement, identify opportunities for training and technical assistance, identify high-performing projects and recipients which should be prioritized for new or expansion project funds, and identify low-performing projects against which action should be taken.
- 2.2. **CoC Recipient Monitoring:** TPCH monitors the program performance of all CoC-funded projects, including HMIS and Planning Grant projects, annually using a two-fold strategy: quarterly performance reporting and annual administrative review.
- 2.3. **CoC Subrecipient Monitoring:** CoC recipients are required to conduct annual subrecipient monitoring in accordance with 2 CFR 200. Recipients must provide evidence of annual subrecipient monitoring to include a risk assessment, monitoring report, and follow-up actions taken by recipient and/or

subrecipient as part of CoC Recipient Monitoring. Subrecipient performance will be indirectly monitored by TPCB through review of monitoring documentation submitted by the CoC recipient and through project-level performance evaluation.

- 2.4. **Emergency Solutions Grant Recipient and Subrecipient Performance Evaluation:** TPCB conducts ESG recipient and subrecipient performance evaluation quarterly in accordance with the requirement set forth in 24 CFR 578.7(a)(7). ESG performance evaluation is intended to strengthen system performance and expedite efforts to prevent and end homelessness in Pima County. TPCB's performance evaluation approach is built on collaborative partnership with ESG recipients covering all or part of Pima County.

3. PROCEDURE FOR MONITORING CoC PROJECTS

- 3.1. TPCB uses a two-fold approach to CoC project monitoring including quarterly program performance monitoring and annual administrative review. Performance evaluation and monitoring activities are assigned to the Performance Evaluation and Monitoring (PEM) Committee in partnership with the TPCB Board of Directors, Collaborative Applicant/CoC Lead Agency, and HMIS Lead.

- 3.1.1. **Project Performance Monitoring** is conducted quarterly and based on the federal fiscal year (October-September) to maintain consistency with other CoC reporting requirements. Each quarterly report includes year to date performance data from the beginning of the federal fiscal year (October 1). Quarterly performance reports are prepared by CoC recipients and due to the Collaborative Applicant/CoC Lead Agency and responsible committee(s) by the 30th day of the month following the end of the quarter (January, April, July, October). Quarterly Program Performance Monitoring includes HMIS Data Quality and Timeliness, HUD and TPCB performance standards, bed/unit utilization, Coordinated Entry and CoC participation, grant spending, and other measures as approved by the TPCB Continuum of Care Board. Quarterly performance reports are reviewed by the CoC Program Grant Committee (CoC program reports) and System Performance Evaluation Committee (ESG program reports) and evaluated against TPCB performance standards. The responsible committees provide a summary report of project performance to the TPCB Board of Directors and the Continuum of Care within 45 days of report submission. ESG program reports are additionally provided to HUD's ESG funding recipients (City of Tucson, Pima County, State of Arizona) within the same timeframe.

- 3.1.2. **Administrative Review** is conducted by the Collaborative Applicant/CoC Lead Agency annually. Administrative Review assesses compliance with Federal and local requirements related to program policies and procedures, financial management, subrecipient oversight, grant administration, recordkeeping, and other issues as directed by the TPCB Board of Directors and/or General Council. Upon desk review of agency and program policies and procedures, financial audits, HUD and TPCB monitoring results, LOCCS draws, HUD APRs, subrecipient documents, and other relevant items, the Collaborative Applicant/CoC Lead Agency prepares an Administrative Review Summary which is provided to the CoC recipient and PEM Committee for delivery to the TPCB Board of Directors.

4. MONITORING REPORTS AND PERFORMANCE IMPROVEMENT PLANS

- 4.1. The responsible committees to the TPCB CoC Board an annual monitoring report for each CoC project. The monitoring report includes a summary of project performance over the immediately preceding 18 months, the completed Administrative Review Summary, and Performance Improvement Plan recommendations, if applicable. The TPCB CoC Board is responsible for approving and issuing Performance Improvement Plans but may delegate this authority to the Continuum of Care Program Grant Committee, the Collaborative Applicant/CoC Lead Agency, or another entity at its discretion. Projects meeting the following criteria will be issued a performance improvement plan.

- 4.1.1. Low performance identified in one or more performance measures during any three quarters in an 18-month period or during the two immediately preceding quarters.

- 4.1.2. Failure to meet TPCB and Coordinated Entry participation standards or other requirements as defined in the TPCB Governance Charter and Operating Policies, Written Standards, or Coordinated Entry Policies and Procedures during any quarter.
 - 4.1.3. Failure to provide administrative review documents and/or a complete quarterly performance report including all required attachments by the approved deadline.
 - 4.1.4. Non-compliance with Federal and/or local requirements.
 - 4.1.5. Other areas of concern identified by the Continuum of Care Program Grant Committee, Collaborative Applicant/CoC Lead Agency, and/or HMISLead and approved by the TPCB Board of Directors.
- 4.2. Once approved, the monitoring report will be issued to the grant recipient. If issues of non-compliance and/or under-performance are identified, the monitoring report will include a Performance Improvement Plan which specifies the issue(s) of non-compliance and/or low performance identified and any performance improvement activities being recommended or required by the TPCB Continuum of Care Board or its designee. Performance Improvement Plans may include but are not limited to participation in technical assistance activities, actualized performance improvements, or demonstration of compliance with Federal and local requirements.
- 4.3. Upon receipt of a Performance Improvement Plan, grant recipients will have 30 days to provide in writing:
- 4.3.1. Evidence that issues of non-compliance have been remedied (updated policies, HMIS reports, etc.)
 - 4.3.2. A summary of actions taken and/or to be taken to improve program performance (staff training, supportive service enhancements, etc.)
- 4.4. At its discretion, the TPCB Continuum of Care Board or its designee may require additional follow-up activity and/or evidence from the grant recipient before closing the monitoring file.
- 4.5. Unresolved or ongoing performance concerns may negatively impact project rating and ranking during annual Notice of Funding Availability (NOFA) cycles resulting in rating score penalties and/or ranking adjustments. The TPCB Continuum of Care Board will, at its discretion, take action against low-performing projects up to and including involuntary reallocation.
- 4.6. The Quarterly Program Performance Monitoring Report and Administrative Review requirements will be reviewed by the Collaborative Applicant/CoC Lead Agency and the Continuum of Care Program Committee annually and updated as needed to reflect changes to TPCB performance standards, HUD guidance, NOFA requirements, community priorities, or other directives from the TPCB Board of Directors and/or General Council. Any changes made to one or both tools will require the approval of the TPCB Board of Directors.

5. PROCEDURE FOR EVALUATING ESG RECIPIENT AND ESG SUBRECIPIENT PERFORMANCE

- 5.1. ESG recipient and ESG subrecipient performance targets are established annually in partnership with ESG recipients operating in Pima County.
- 5.2. Performance targets are approved by local ESG recipients and the TPCB Continuum of Care Board to reflect HUD standards, community priorities, and locally-developed system performance measure targets.
- 5.3. Approved performance targets are tracked in HMIS. Performance is reported by the HMIS Lead to the

CoC and ESG recipients quarterly to inform ESG subrecipient monitoring and funding allocations, as well as training and technical assistance offerings provided by TPCH and/or ESG recipients.

- 5.4. ESG recipient and ESG subrecipient performance evaluation activities are limited to the duties assigned in this section. TPCH is not responsible for monitoring ESG recipient and ESG subrecipient compliance or overall performance.