

**SUBJECT: Miami-Dade CoC Compliance and Performance Monitoring
OVERVIEW**

EFFECTIVE DATE: 09/26/2024

REVISED DATE:

PURPOSE: This procedure provides a high-level outline of our compliance and monitoring approach.

SCOPE: Homeless Trust funded providers

PROCEDURES:

A. Sub-Recipient Grant Compliance and Financial Management Monitoring

1. Focus:

Regulatory compliance and sound financial management to prevent risk to HUD and the Homeless Trust.

2. Monitoring Approach:

- Grants and Financial Management Risk Analysis (annually)
- Desk Audit (based on risk)
- On-Site Monitoring (based on risk, but all sub-recipients must have on-site monitoring within a three-program year period).

3. Monitoring Outcomes:

- Formal Findings and Enforcement Action
(If formal findings are identified, the Homeless Trust (pass-through entity) must issue Management Letter within 6 months of agency audit acceptance in the Federal Audit Clearinghouse)
- Compliance Improvement Plan
- Technical Assistance
- Training

B. Sub-Recipient Program Performance and Standards Compliance Monitoring

1. Focus:

Homeless Trust: Evaluation and assessment to ensure that funded agencies are (a) providing client-driven, responsive and effective service delivery that is producing outcomes that achieve the CoC's goal to end homelessness and (b) complying with the CoC Standards of Care.

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Agency: Self-assessment to (a) honestly evaluate the current state of their own organization in several key areas such as participation in coordinated entry, verification of chronic homelessness, utilization of data, and services provided and (b) determine need for technical assistance.

2. Monitoring Approach:

- Agency Performance Score and Renewal Ranking for Each Project (annually during the NOFA, may recommend Performance Improvement Plans)
- Homeless Trust Performance and Standards Assessment (Homeless Trust will ask providers for updates to the tools every two years)
- Agency Self-Assessment (annually)

3. Monitoring Outcomes:

- Performance Improvement Plan
- Technical Assistance
- Training

C. CoC & Coordinated Entry System Compliance and Performance Monitoring

1. CoC Evaluation of CoC and Coordinated Entry System Elements (annually)

- CoC and CES System Elements Evaluation

2. CoC System Performance Outcome Reporting (ongoing)

- HUD LSA
- HUD STELLA
- Trust Reports

3. Performance and Evaluation Committee (quarterly)