**Three County CoC Monitoring**

**What is it?**

Each year, the Three County CoC conducts monitoring of its subrecipients to ensure proper stewardship of sponsor funds, as well as adherence to HUD’s interim rule, the CoC Program, and the subrecipient agreement terms. The CoC will keep documentation of subrecipient monitoring, including findings and corrective actions, onsite for at least 7 years.

**Why do we do it?**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) (“Uniform Guidance”), specifically §200.332, requires pass-through entities (in this case, Community Action) to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.

Annual monitoring also helps to inform Community Action (as the CoC Collaborative Applicant) for project ranking and evaluation in preparation for the annual NOFO competition. A project’s ranking is based on their **project monitoring score** and **system performance measures score**.

For example, if Project A received a 50/50 on their project monitoring, and a 60/70 on their system performance measures, their score for ranking purposes would be 110/120.

If Project B received a 49/50 on their project monitoring and a 65/70 on their system performance measures, their score would be 114/120 for ranking.

During project monitoring, the CoC reviews materials such as the agency’s most recent audit; the Board of Directors list; Policies and procedures related to HMIS/Data Management, Fiscal/Accounting, and the specific CoC funded program; Program intake materials; Client files; and the conduct and expectations of participants. Please note that this list is not exhaustive and subject to change.

**What does it look like?**

Subrecipients will receive an email from the CoC, informing them that the monitoring process has begun. This email will specify the documents that must be sent (via a secure ShareFile link) to the CoC. All projects will need to upload the requested client files and completed self assessment, but **only projects that have never been monitored will be asked to submit all documentation. For projects who have been monitored before, we will only ask for documents that have been updated or changed**. This is a change from previous years, as the CoC wants to make this process as simple as possible.

Additionally, the CoC will only hold monitoring meetings when needed (first time projects, as well as projects where further discussion is needed), although other projects are welcome to request a meeting as well.

At the monitoring meeting, CoC and CAPV Fiscal staff discuss the policies, procedures, forms, and documents that were submitted. The projects’ system performance measures are also discussed. The CoC strives to ensure that monitoring meetings are a space of dialogue rather than lecture. Projects are encouraged to explain certain aspects, particularly if the CoC has noted an issue or something missing. If a project does not have adequate policies/procedures or at the time of the monitoring meeting has not yet submitted required materials, the CoC will note this as a **Finding**.

Following the meeting, a summary of results and feedback are communicated to each project. For any projects whose monitoring process resulted in **Findings**, the necessary Corrective Actions are determined, as well as deadlines for completion of said Actions.

The CoC then meets with the Ranking and Evaluation Committee to review the monitoring scores and create its Priority Listing (which is submitted with the Collaborative Application).