

2025

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# PROGRAM MONITORING

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## *POLICIES & PROCEDURES*

*ADOPTED BY THE BOARD ON JANUARY 30, 2023*

*UPDATED BY THE BOARD JANUARY 2025*

*THESE POLICIES WERE PREVIOUSLY INCORPORATED INTO OTHER POLICIES AND PROCEDURES, BUT WHEN ADOPTED BY THE BOARD BECAME A STANDALONE DOCUMENT. THESE POLICIES AND PROCEDURES SUPERSEDE ALL PREVIOUSLY ADOPTED PROGRAM MONITORING POLICIES AND PROCEDURES AS WELL AS ANY MONITORING-RELATED PROVISIONS IN OTHER PREVIOUSLY ADOPTED POLICIES AND PROCEDURES.*



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# OVERVIEW

## **Background**

Monitoring is the process by which the Collaborative Applicant reviews and assesses program performance within the Continuum of Care (CoC) and makes recommendations based on these assessments. As the Collaborative Applicant, the Maricopa Association of Governments (MAG) is responsible for ensuring program success in relation to both federal and designated community standards. Monitoring follows an annual schedule and is considered a year-round process. Included in this document is an overview of the monitoring timeline, the metrics used when assessing performance, and what agencies can expect when undergoing both a remote and on-site monitoring visit. Documents included in the Appendix are intended to provide further guidance to agencies preparing for monitoring visits or when looking to internally assess their programs for alignment with the greater CoC community.

A full glossary of terms can be found [here](#). A complete list of acronyms used can be found [here](#).

## **Objectives**

The purpose of monitoring is not punitive; monitoring is used as a tool to aid the Collaborative Applicant in understanding system gaps and to most effectively respond to homelessness within the CoC. At both the project and the system level, the ongoing monitoring process is intended to accomplish a number of key objectives including:

- Improving individual project and overall system progress in relation to the community's goals for reducing homelessness;
- Ensuring responsible, cost-effective, and compliant use of HUD resources;
- Underscoring a commitment to housing interventions that provide positive housing outcomes and improvements in the overall well-being of participants; and
- Identifying additional resources and support that programs need to succeed.

## **Guiding Principles**

Monitoring is guided first and foremost by the Maricopa CoC Board Strategic Plan, which summarizes the CoC's strategic framework of placing data and equity at the center of all CoC work. Further, community priorities such as the adherence to Housing First principles, the involvement of those with Lived Experience, and the implementation of structural racial equity changes are all guiding principles that influence the coordination of monitoring.

Monitoring visits are not program audits, but instead designed to be opportunities for agencies and MAG to work together to assess performance, highlight successes, and strategically evaluate how to strengthen program design and execution.

# Structure

## Prioritization Metrics

Projects that become prioritized for monitoring are those that require more in-depth monitoring and technical assistance. This prioritization is determined by a project's performance across several factors explained further below.

### Notice Of Funding Opportunity (NOFO) Scoring

Projects scoring 10% or more under the median project score will be flagged as a priority for individualized monitoring. This metric will be reviewed annually post Rank and Review and be shifted appropriately depending on the spread of scores throughout the CoC.

### Project Spenddown

Agencies that consistently spend down less than 90% of funds for projects they are seeking to renew will be flagged for technical assistance and considered for priority monitoring.

### Rank and Review Feedback

Based on the process of interviewing and scoring projects, the Rank and Review Committee will have the opportunity to list agencies falling below community standards and in need of priority monitoring, individualized technical assistance, or both.

### Previous Monitoring

Agencies with persistent monitoring findings, either from HUD or CoC monitoring, will be flagged for technical assistance and considered for priority monitoring.

## Monitoring Timeline

It is the CoC's responsibility to perform some level of monitoring for every agency annually. However, the timeline and nature of these checks will vary depending on whether a project has been designated as a priority for more detailed monitoring. Please keep in mind that the time of year in which MAG will begin and end monitoring visits will shift depending on the timing of the annual NOFO release and completion. In addition to annual monitoring checks, MAG will complete quarterly data checks using program performance measures, quarterly grant spenddown checks, and monthly Sage reporting checks.

### Priority Monitoring

This process will include on-site visits and client-file reviews, and require more time from the agency than routine monitoring. Ultimately, this added time and effort will allow MAG to hear more about an agency's challenges and to provide more targeted support.

October – December:

- MAG sends letters with both regulating compliance and program quality self-assessment tools.
- Agency returns self-assessment tools within 30 days of receipt.
- MAG reviews assessment responses and sends input 2 weeks after receiving the completed tools.
- MAG schedules in-person meetings with agency to provide feedback on tools and review select client files.

December – February:

- MAG completes the in-person visit.
- MAG schedules any necessary follow-up meetings.
- Within 30 days of the site visit, MAG will provide follow-up communication regarding the outcomes of the visit and any next steps the agency needs to take.

### Routine Monitoring

This process reflects a quicker and more standardized monitoring check for agencies who do not currently require individualized, unique monitoring. Due to the number of agencies and projects in the Maricopa Regional CoC, agencies who are not prioritized will all receive the self-assessment tools, but be divided into groups alphabetically and receive on-site visits on a biannual basis.

January – March:

- MAG sends letters with high-level check-in tools.
- Agency returns self-assessment tools within 30 days of receipt.
- MAG reviews assessment responses and sends input 2 weeks after receiving the completed tools.

February – April: *(only for agencies with the biannual site visit)*

- MAG schedules in-person meetings with agency to provide feedback on tools and review select client files.
- MAG completes the in-person visit.
- MAG schedules any necessary follow-up meetings.
- Within 30 days of the site visit, MAG will provide follow-up communication regarding the outcomes of the visit and any next steps the agency needs to take.

## Recurring Monitoring Checks

This process includes a combination of quarterly and monthly checks that MAG staff complete to ensure programs are maintaining consistency with HUD requirements and community standards throughout the year. These checks are completed for all agencies, regardless of performance.

**Sage Reporting:** MAG is responsible for ensuring that the Continuum of Care stays in compliance with the HUD regulation of timely completed SAGE reports for every HUD CoC funded agency.

- Each month, MAG notifies agencies with upcoming SAGE report deadlines that have not yet started their report.
- If HUD rejects any report, MAG will get in contact with the agency to offer support in the correction and resubmission process.

**Project Spending:** MAG receives quarterly spenddown reports from HUD of all CoC-funded projects. These reports are reviewed to gauge which projects consistently spend/do not spend their funds, offer support as needed, and reduce the amount of money recaptured by HUD.

- Each quarter, MAG notifies agencies with active projects that are more than 15% behind on projected spending, as well as those with completed projects that have more than 10% of their budget remaining.
- MAG hosts discussions with agencies with consistent spenddown concerns and enacts performance improvement plans as needed.

**Data Checks:** To ensure agencies are assessing program performance throughout the year, MAG will require agencies to pull designated reports from HMIS on a quarterly basis.

- Each quarter, MAG will use the Program Performance Measures Dashboard to assess which projects show outcome criteria below the system average.
- Agencies will pull specific HMIS reports based on the flagged criteria and complete a Data Notice Form to send to MAG staff.

## Monitoring Tools

The self-assessment tools are designed to help agencies and MAG work together to identify and address challenges at both the program and agency level. These tools are not scored and are not used to penalize agencies for shortcomings. The intention of these tools is to provide a cursory view of any service, regulatory, or structural gaps, and then use the results of the completed tools to begin conversations about addressing the gaps.

Agencies are expected to complete one assessment for agency-wide policies, and another for program-specific policies. Depending on an agency's programs, MAG will send the agency tool and program tools for Housing Programs, Coordinate Entry (CE), and the Homeless Management Information System (HMIS). Using the performance reports located in Business Objects on the HMIS Service Point platform will be imperative for completing the quarterly data check process.

Links to each of these tools can be found in the appendix of this document. Please note that these tools are under continuous review as the standards and needs of the Maricopa Regional CoC shift.

## Roles and Responsibilities

### CoC and Agency Expectations

Clear communication between MAG and agencies is imperative to the success of the monitoring process. It is expected that all parties speak honestly about challenges and successes, as well as make time for intentional discussion about any changes that may need to occur.

#### CoC Expectations

- Schedule visits at a time that is amenable to all parties.
- Clearly explain monitoring intentions and timelines.
- Provide prompt and useful feedback.
- Support all agencies on both individual and CoC-wide challenges.
- Provide additional support to agencies when monitored by the U.S. Department of Housing and Urban Development.
- Provide opportunities for feedback on the monitoring process.

Provide a detailed report of monitoring outcomes to CoC Collaborative and the CoC Board on an annual basis, including a detailed review of program performance measures. Agency Expectations

- Return completed self-assessment tools in a prompt and legible manner.
- Make time for on-site visits.

- Prepare all needed materials prior to on-site visits.
- Provide clear and honest responses to self-assessment tools and on-site visit discussions.
- Notify MAG when monitored by the U.S. Department of Housing and Urban Development.
- Communicate openly about agency and programmatic needs to assist MAG in identifying useful training topics.
- Ask questions and request further explanation as needed.

## Technical Assistance

The technical assistance offered in conjunction with the monitoring process may differ year to year, as the nature of the assistance will be determined by individual agency and community need. All agencies will have the opportunity to request assistance or feedback after the NOFO application scores are made public, regardless of score. Additionally, MAG will be offering both annual trainings and recorded trainings that can be revisited at any time on the MAG website.

Agencies with projects that fall 10% below the median NOFO application score, consistently exhibit poor project spenddown, and/or have previously unresolved monitoring findings will have greater opportunity to receive individualized technical assistance and necessary trainings to address challenges. MAG will work with agencies to determine current gaps and needs, and recommend MAG facilitated trainings or trainings from an outside organization. Additionally, MAG will work alongside the agency to set performance goals and timelines that will help bring projects up to community standards.

In certain cases in which, after annual technical assistance is offered, project gaps show no sign of improvement and the project consistently does not meet CoC standards, agencies will be placed on a performance improvement plan (PIP). Once on a PIP, MAG will work with the agency to establish an improvement timeline, including regular check-ins. Should a project fail to meet designated benchmarks for improvement, the project will become at risk for reallocation in the following NOFO application cycle.

# Appendix

This policy was written in conjunction with other [policies and procedures of the Maricopa Regional Continuum of Care](#). Grant recipients and providers are encouraged to review the ESG and CoC Written Standards, Community Glossary, and Community Adopted Best Practices for more information.

## Monitoring Tools

### **Priority Agency Tools**

All Programs

- [CoC Compliance Monitoring Tool](#)
- [On-Site Monitoring Expectations Checklist](#)

Housing Programs

- [On-Site Program Monitoring Tool](#)
- [Client File Checklist](#)

Coordinated Entry (CE)

- [On-Site Program Monitoring Tool](#)

Homeless Management Information System (HMIS)

- [On-Site Program Monitoring Tool](#)

### **Routine Check-In Tools**

Housing Programs

- [High Level Check-In Tool](#)

Coordinated Entry (CE)

- [High Level Check-In Tool](#)

Homeless Management Information System (HMIS)

- [High Level Check-In Tool](#)

## Program Performance Tools for Housing Providers

### **Maricopa CoC Performance Measures**

- <https://azmag.gov/Portals/0/Homelessness/Forms/CoC-Program-Performance-Measures.pdf?ver=9dkPA8Juvzd7FwlzziumGQ%3d%3d>

### **Training for using performance reports in Business Objects in Service Point**

- <https://app.workramp.com/tasks/42668060-323b-11ee-a5a3-02d94a2bc2f1/preview>