

# Memorandum

To: Community Shelter Board Partner Agencies

CC: Lianna Barbu; Heather Notter

From: Cathy Ellerbrock

Date: March 1, 2021

Re: Program Review & Certification 2021

---

The 2021 Program Review & Certification (PR&C) on-site visits are being modified because of COVID-19 protocols and disruptions, and to maximize the social distancing required to contain the pandemic. This memo is an addendum to the FY21 Monitoring Guide for Subrecipients for the 2021 monitoring year only. The 2021 Standards and a webinar outlining changes to the standards since last year are posted on CSB's website [here](#). We will take into account COVID-19 waivers to specific requirements that CSB previously communicated. Each partner will receive an email with scheduling options and details.

Partner Agencies will provide the following items to CSB:

- < Tier 1 policies, only if there have been changes since the last time we reviewed the policy (standards A2, D3, D6, E2, E3, E6, E7, F1, F3, F4, F5, H3 (new), H6, H8, H9, M1, M2, M3, M5, M7, M8, M9, M10)
- < Recent board meeting minutes documenting participation of the designated homeless or formerly homeless board member
- < Internal control questionnaire updates
- < Self-certification of Tier 2 and Tier 3 standards
- < Grievance, appeals, and service restriction reports
- < Client feedback surveys
- < Maintenance records (shelters and site-based facilities)

Client File Reviews

Each agency will choose one of the below options for client file reviews:

- < Drop off files at CSB
- < Securely email scanned documentation to CSB
- < Upload documentation in HMIS
- < On-site file review, where CSB staff will come to a partner agency site, with appropriate precautions, including social distancing and masks for all participants. This option would require a space large enough for all participants to work at least 6

feet apart and/or having the data component review occur on a different day than the programmatic component review to minimize the number of participants.

- < To protect clients and staff and comply with State guidance, CSB will not conduct on-site reviews when Franklin County is under Level 3 or 4 of Ohio's COVID-19 Health Advisory Alert. Partners that require an on-site review may be able to delay the review, in consultation with CSB.

CSB will review client files for data accuracy, clarified guidelines (green text in the standards), requirements specific to federal funding, and any compliance issues noted in the 2020 review.

### Standards Review and Discussion

For the following Tier 1 standards, CSB usually conducts on-site review and discussion. For 2021, to maximize social distancing while still confirming compliance, Partner Agencies will review each of the below standards in detail and self-certify compliance, except for programs noted below as being reviewed by CSB.

- < A2 Signed conflict of interest forms.
- < D2 Costs are charged to the appropriate funding sources, have verification of all expenses invoiced, and only allowable costs are on the profit/loss statements. CSB will also continue to rigorously monitor these standards via in-depth monthly monitoring of 10% of the costs on invoices for CoC- and ESG-funded programs.
- < D4 Timesheets show separate accounting for program and non-program staff time. CSB will also continue to rigorously monitor this standard via in-depth monthly monitoring of 10% of the costs on invoices for CoC- and ESG-funded programs.
- < D5 In-kind match documentation tracking. CSB will also continue to rigorously monitor this standard via in-depth monthly monitoring of 10% of the costs on invoices for CoC- and ESG-funded programs.
- < E2 Housing first documentation (CSB will review Shelter programs because there are clarified guidelines).
- < E3 Homelessness documentation (CSB will review federally-funded programs).
- < E6 Annual assessments (CSB will review federally-funded programs).
- < E7 Admissions policy posting.
- < F1 Client rights posting.
- < F2 Client income exclusions (CSB will review federally-funded programs).
- < F4 Appropriate exit and retention plans.
- < G1 Complete and updated Individualized Housing Stabilization Plans.
- < G2 Timely case notes (CSB will review federally-funded programs).
- < G4 Screening and Prioritization documentation (CSB will review federally-funded programs).
- < H2 Current leases, H3 tenant rent, H4 RRH recertification, and H5 FMR/Rent Reasonableness forms (CSB will review federally-funded programs).
- < H6 Voluntary disability-related supportive services documentation.
- < J2 Housing inspection forms (CSB will review federally-funded programs).
- < J4 lead-based paint requirements (CSB will review federally-funded programs).
- < J3 Accessible and stocked first aid kit.

- < M4 Data collection signage.
- < M8 privacy policy signage.
- < M13 Visual inspection of secure workstations.
- < M14 Verify multiple workstation simultaneous HMIS log-on.
- < M15 hard-copy PPI security.

CSB will conduct Technical Assistance (TA) reviews for new programs, as usual. We will specify in the agency-specific emails if this applies to your agency. Instead of reviewing all policies, CSB will review only Tier 1 policies. CSB will review client files and provide TA, using the above process.

#### Exit Interviews and Reports

For remote reviews, after reviewing client files, policies, and self-certifications, CSB will email exit interview forms to the Partner Agency for discussion via a video call that is open to anyone in your agency. A formal report will follow, as usual.

Please contact Cathy Ellerbrock at [cellerbrock@csb.org](mailto:cellerbrock@csb.org) if you have questions. Thank you for your continued flexibility this year!