

Memorandum

To: Community Shelter Board Partner Agencies

CC: Lianna Barbu; Heather Notter

From: Cathy Ellerbrock

Date: May 15, 2020

Re: Program Review & Certification 2020

The 2020 Program Review & Certification (PR&C) on-site visits are being modified due to COVID-19 protocols and disruptions, and to maximize the social distancing required to contain the pandemic. This memo is an addendum to the FY20 Monitoring Guide for Subrecipients for the 2020 monitoring year only. The 2020 Standards and a webinar outlining changes to the standards since last year are posted on CSB's website [here](#). We will also take into account COVID-19 waivers to specific requirements that CSB previously communicated to partners. We will send an email to each partner shortly with scheduling options and details.

Partner Agencies will email the following items to CSB:

- < Tier 1 policies, only if there have been changes since we reviewed the policy last year (standards A2, D3, D6, E2, E3, E6, E7, F1, F3, F4, F5, H6, H8, H9, M1, M2, M7, M8, M9, M10)
- < Tier 2 policies for agencies that are due for a full review (every 4 years) (standards A3, A4, A5, A6, A7, D8, D9, E12, E13, F6, J11, M17, M18, M19). We will specify in the agency-specific emails if your agency is due for a full review.
- < Internal control questionnaire updates
- < Self-certification of Tier 2 and/or Tier 3 standards
- < Grievance, appeals, and service restriction reports; client feedback surveys
- < Maintenance records if applicable

Client File Reviews

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

- < Drop off files at CSB
- < Securely email scanned files to CSB
- < 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.

CSB will review client files for data accuracy, clarified guidelines (green text in the standards), requirements specific to CoC and ESG funding, and any compliance issues noted in the 2019 review.

Standards Review and Discussion

For the following standards, CSB usually conducts on-site review and discussions. For 2020 only, to maximize social distancing while still confirming compliance, Partner Agencies will review each of the below standards in detail and send an email to CSB certifying compliance, with the exceptions noted.

- < A2 Signed conflict of interest forms.
- < For agencies that are due for a full review, A4 non-discrimination postings, A5 signed drug-free workplace acknowledgements, and A6 firearms policy posting.
- < 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.
- < For agencies that are due for a full review, D12 posting of wage and hour notice.
- < E2 Housing first documentation (CSB will review Shelter programs because there are clarified guidelines).
- < E3 Homelessness documentation (CSB will review CoC-funded programs because non-compliance can result in a finding and repayment of funds to HUD).
- < E6 Annual assessments (CSB will review CoC-funded and Prevention programs because non-compliance can result in a finding and repayment of funds to HUD and because there are updated prevention guidelines).
- < E7 Admissions policy posting.
- < For agencies that are due for a full review, E12 translation services.
- < F1 Client rights posting.
- < F2 Client income exclusions.
- < F4 Appropriate exit and retention plans (CSB will review case closure forms for RRH and prevention programs because there are clarified guidelines).
- < G1 Complete and updated Individualized Housing Stabilization Plans (CSB will review family shelters, PSH, RRH and Prevention programs because there are clarified guidelines).
- < G2 Timely case notes (CSB will review RRH, Prevention and Outreach programs because there are clarified guidelines).
- < G4 Screening and Prioritization documentation (CSB will review Shelter, CARR Team, Outreach and RRH because there are clarified guidelines).

- < H2 Current leases, H3 tenant rent, H4 RRH recertification, and H5 FMR/Rent Reasonableness forms (CSB will review CoC-funded programs because non-compliance can result in a finding and repayment of funds to HUD).
- < H6 Voluntary disability-related supportive services documentation.
- < J2 Housing and J4 lead-based paint inspection forms (CSB will review CoC-funded programs because non-compliance can result in a finding and repayment of funds to HUD).
- < J3 Accessible and stocked first aid kit.
- < For agencies that are due for a full review, verify facility visual inspections (J5 phone access, J6 shelter bedding, J7 restrooms appropriate and in good working order, J8 childproof precautions, J9 client personal storage, J10 third-shift sleeping area, J11 evacuation routes, signage and training, J12 site-based monitoring of facility entrances, J13 disability accessible).
- < M3 Data collection and M8 privacy policy signage.
- < M14 Visual inspection of secure workstations and M16 written client information.
- < M15 Verify multiple workstation simultaneous HMIS log-on.

Exceptions

Partner agencies that were compliant two years in a row (2018 and 2019) are exempt from the above requirements. CSB will review requirements specific to CoC-funded programs via HMIS/CSP and will contact the appropriate partner agency with any questions or concerns. We will specify in the agency-specific emails if this applies to your agency.

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.

Any agency that is due for a full review but is transitioning its programs to a different partner agency for FY21 will receive a limited review instead of a full review. We will specify in the agency-specific emails if this applies to your agency.

Exit Interviews and Reports

After reviewing client files, policies, and self-certifications, CSB will email exit interview forms to the Partner Agency and we will discuss the review 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 if you have questions. Thank you for your continued flexibility this year!