**Internal Monitoring Guidance**

**Purpose**:

The Texas Homeless Network, Collaborative Applicant for the Texas Balance of State Continuum of Care (TX BoS CoC), recognizes that high performing programs actively monitor participant’s documents of eligibility and service delivery, to increase successful participant outcomes and ensure compliance with grant guidance. With input from frontline agencies, the TX BoS CoC releases guidance to inform project policies and procedures for internal project monitoring.

**Outline**:

This guidance provides suggested policies for agencies wishing to facilitate high performing projects. This guidance recognizes the differing capacities of project staff across the balance of states, as well as different project components, and addresses each as such. Recommendations are distinguished between acceptable expectations and recommended expectations, responsible parties for conducting these file reviews, and suggested actions when deficiencies are identified.

**Permanent Supportive Housing (PSH) Internal Monitoring Expectations**

**Acceptable**: PSH projects should conduct a thorough analysis of all participant files, reviewing all records at least annually. Participant files are reviewed within two weeks of project enrollment and two weeks of project termination. Primary participant support staff are responsible for conducting ongoing due diligence to ensure that documentation is collected in accordance with HUD recordkeeping requirements. Supervisory staff is responsible for conducting participant files reviews at least annually.

**Recommended**: PSH projects should conduct a thorough analysis of all participant files, reviewing all records at least quarterly. Participant files are reviewed within two weeks of project enrollment and two weeks of project termination. Primary participant support staff are responsible for conducting ongoing due diligence to ensure that documentation is collected in accordance with HUD recordkeeping requirements. Supervisory staff is responsible for conducting participant files reviews at least annually.

**Rapid Re Housing (RRH) Internal Monitoring Expectations**

**Acceptable**: RRH projects should conduct a thorough analysis of all participant files, reviewing all records at least annually. Participant files are reviewed within two weeks of project enrollment and two weeks of project termination. Primary participant support staff are responsible for conducting ongoing due diligence to ensure that documentation is collected in accordance with HUD recordkeeping requirements. Supervisory staff is responsible for conducting participant files reviews at least annually.

**Recommended**: RRH projects should conduct a thorough analysis of all participant files annually, reviewing 25% of participant files quarterly, prioritizing older files for consideration. Participant files are reviewed within two weeks of project enrollment and two weeks of project termination. Primary participant support staff are responsible for conducting ongoing due diligence to ensure that documentation is collected in accordance with HUD recordkeeping requirements. Supervisory staff is responsible for conducting participant files reviews at least annually.

**Files Review Categories**

When conducting file reviews, designated review staff will focus efforts on six categories:

**Participant Eligibility**: Review staff will assess for correct documentation, third-party verification, and necessary homeless documentation of eligible participant.

*PSH* *Example: Are chronically homeless participant’s history of homelessness supported by third-party documentation and self-certification, if necessary?*

*PSH Monitoring Note: 25% of overall participants can self certify homelessness history for the purpose of establishing chronic homelessness status. Please refer to* [*HUD FAQ ID 2872*](https://www.hudexchange.info/faqs/2872/for-many-persons-experiencing-chronic-homelessness-obtaining-the-required/)

*RRH Example: Are homeless participants status accurately documented with third-party verification?*

**Enrollment Documentation**: Review staff will assess for complete enrollment forms and documentation, ensuring that all forms contain appropriate signatures and “Date Receives” for documentation.

*Example: Signed Program Contract? Proof of Income from within the last 30 days? Grievance Policy signed received by participants? Signed Termination Policy? VAWA protections signed received by Participant? Does enrollment date align with HMIS records?*

**Rental Assistance or Leasing Docs**: Review staff assesses for correct collection of forms and documents about participant housing and rental assistance annually or as needed to be collected in a timely manner.

*Example: Housing Quality Standard Form completed before Move-In? Rent Reasonability with supporting documentation? Copy of the lease signed by the participant? Move-In date aligned with Move-In Date in HMIS? Rent Calculator with Proof of Income? Proof of Zero Income if needed?*

*RRH Example: Recertification Form every three months? Income Verification Form at entry, annual assessment, and at changes of income? Subsidy Request Forms completed monthly? Subsidy Projections completed at least every 90 days?*

**Service Delivery Documents**: Review staff will assess for related forms at least annually, possibly more frequently as detailed by project policy and procedure.

*Example: Initial Needs Assessment Form signed by the participant? Needs Assessment Form Updated at least Annually? Case Notes? (Optional) Participants Budgets?*

**HMIS Documentation:** Staff will review HMIS entries for consistency with participant HMIS record and program files. Dates should reconcile with enrollment, move-in, and service delivery documentation consistent with the project’s service delivery tracking policies.

*Examples: Are case notes documented in a consistent format? Do dates of enrollment and move in reconcile with lease-ups and enrollment paperwork. Do financial assessments correspond with project income verifications?*

**Exit Documentation**: Review staff will assess for related forms at least annually.

*Example: Participant Termination From completed? Copy of Participant Termination Letter? Grievance Letter Provided at time of Termination? VAWA Rights provided at the Termination of Assistance?*

**Identified Deficiency Guidance**

If a project identifies a deficiency within a participant’s file, which cannot be addressed, the review staff will create a MEMO TO FILE detailing identified deficiency and planned steps to resolve the deficiency. If the deficiency cannot be resolved, project staff should contact their HUD Field Office to request further guidance to resolve the deficiency. Projects may also reach out to THN for guidance.