Community Action Pioneer Valley’s Three County CoC

***Ranking and Evaluation Committee Meeting***

**1-2:30pm Friday, January 28, 2022.  This meeting will be held on zoom.**

Present: Keleigh Pereira, CoC; Dave Christopolis, Hilltown; Justine Dodds, city of Pittsfield; Calpurynia Roberts, MHSA; Anyd Klatka, Teri

1:00-1:10pm –Introductions/agenda outline

1:10-1:30pm – New CoC level –Subrecipient Policy review/suggestions for additional policies the CoC should provide to subrecipients – ***see current policy expectations/outline and draft policies.***

* Anti-discrimination policies.
	+ Comments: do most agencies have this? – most have not demonstrated that.
	+ Good complied document, makes sense.
	+ Three county CoC will do: add in inclusion of people with lived experience
		- Also add in Recognize implicit bias as well as the explicit discrimination.
* Move-On Policy.
	+ Is there a sample policy for subrecipients
	+ Policies have a legal implication, what is being asked of an organization.
		- Add in information about procedural documents/program specific.
	+ Eliot services sees after transition that we see things start to fall apart – services need to be present throughout the program. Its an easy place for agencies to say “we tried, but they do want to do it”. The effort needs to continue to be there.
	+ Can the consequences in response be informed in this document.
	+ HUD is also now requiring “moving on assistance provided” data element – added in October 2021. The CoC is working to prepare subrecipients for this. This may need to be included on the policy.
* Goal is to share with subrecipients before site monitoring.

review of monitoring plan/suggestions for areas of concentration.

*Areas of concentration the COC staff can see for this year:*

* *Policies*
* *equity measures*
	+ *Racial Equity partners to do two trainings (policies and data)*
	+ *Used supplemental questionnaire during NOFO response – may need to incorporate in monitoring this time.*
* *supportive services provided*
* *and match*
* *Client file detail – scoring needs updating*
* *Suggested using reports more to inform the monitoring expectations.*

Site Monitoring of all Projects is usually held during April and May – to adjust to CoC competition timeline

* + Last two years have been offsite/documents sent over secure link/CoC staff evaluation/complete monitoring forms/ schedule meeting to review..request needed docs, and then provide expectations and timelines to meet them. Major findings are identified if there are any, but also recommendations/requests for changes.
	+ Fiscal department may do their own monitoring and may not follow the CoC’s timeframe.
* These are the two relevant questions in the handbook:

*45.*

* + *In making an award to a subrecipient, has the non-Federal entity evaluated each subrecipient’s risk of noncompliance with the Federal statutes, regulations, and terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring? NOTE: This evaluation may include consideration of factors such as: the subrecipient’s prior experience with the same or similar subawards; the results of previous audits, including whether or not the subrecipient receives a Single Audit in accordance with Subpart F of 2 CFR part 200, and the extent to which the same or similar subaward has been audited as a major program; whether the subrecipient has new personnel or new or substantially changed systems; and the extent and results of previous HUD monitoring, if the subrecipient also receives funds directly from HUD. [24 CFR 578.99(e); 2 CFR 200.331(b)]*

*47.*

* + *a. For subawards provided to subrecipients, has the non-Federal entity monitored the activities of the subrecipient as necessary to ensure that the subaward was used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are being, or have been, achieved? [24 CFR 578.99(e); 2 CFR 200.331(d)]Yes No N/A*

*b. Did the non-Federal entity’s monitoring of the subrecipient include:* *Reviewing financial and performance reports required by the non-Federal entity?* *Following-up and ensuring that the subrecipient takes timely and* *appropriate action on all deficiencies pertaining to the subaward* *detected through audits, on-site reviews, or other means?* *Issuing a management decision for audit findings pertaining to the* *subaward a required by 2 CFR 200.521?* *[24 CFR 578.99(e); 2 CFR 200.331(d)(1) – (3)]*

* YHDP Projects will participate for the first time this spring.
* Can some programs that are doing well in areas, skip certain aspects of monitoring
	+ Keleigh is working on gathering this once we get more info from TA providers.
	+ Feels duplicative sometimes/subrecipients have to go through the same things.
* Onsite/offsite considerations
	+ This would be the third year of offsite, might need to follow whatever rules for agencies.
	+ How are other CoC’s addressing the remote? How are the subrecipients handling this?
	+ How much leniency can there be?
	+ Can we go onsite for visit and not monitoring?
	+ Can you create a volunteer team for the monitoring? (using the board and the ranking committee – like the united way does – use folks.

2-2:20pm – review of process for renewal applications/scoring tool as updated since the NOFO release for FY21 – any suggested changes/updates based on monitoring expectations or subrecipient ease– ***see current tool.***

2:20-2:30pm – next meeting/plan for the year

* February date
* guests participating