

City of Riverside

Response to monitoring reports and corrective action

Dated May 31, 2017

City of Riverside
response to monitoring and
corrective action

Kowalski, Jill

From: Salas, Linda
Sent: Tuesday, June 6, 2017 8:26 AM
To: Kowalski, Jill
Subject: FW: RRH and Chronically Homeless Monitoring Responses
Attachments: Monitoring response for RRH and CH.pdf

Here is the City's response.

Linda Salas, Program Specialist II
County of Riverside, Dept. of Public Social Services (DPSS)
Adult Services Division - Homeless Programs Unit (HPU)
4060 County Circle Drive
Riverside, CA 92503
Desk (951) 358-4913
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LSalas@rivco.org

From: Sapien, Monica [<mailto:MSapien@riversideca.gov>]
Sent: Wednesday, May 31, 2017 2:41 PM
To: Salas, Linda <LSalas@RIVCO.ORG>; Concepcion, Rowena <RConcepc@RIVCO.ORG>
Cc: Ramirez, Emilio <ERamirez@riversideca.gov>; Davis, Michelle <MDAVIS@riversideca.gov>
Subject: RRH and Chronically Homeless Monitoring Responses

Good afternoon Linda and Rowena,

I have attached the City of Riverside's monitoring responses for your review. Please let me know if you have any questions. Have a great afternoon!

Monica Sapien
HOMELESS SERVICES COORDINATOR
CITY OF RIVERSIDE
COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT-HOMELESS SERVICES
951.826.3931
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City of Riverside

Response and corrective action to monitoring report

Rapid Rehousing project

Dated May 31, 2017



Community & Economic Development Department

City of Arts & Innovation

May 31, 2017

Linda Salas, Homeless Programs Unit
Riverside County DPSS Homeless Programs Unit
4060 County Circle Drive
Riverside, CA 92503

Grant Number/Contract Number: CA1266L9D081502
Grant Period: 11/01/2016 – 10/31/2017
Project Name: City of Riverside Rapid Re-Housing
Type of Service: Permanent Housing –Rapid Rehousing

Attention: Linda Salas and Rowena Concepcion, DPSS Homeless Programs Unit

RESPONSE TO APRIL 10, 2017 MONITORING FOR CITY OF RIVERSIDE RAPID RE-HOUSING PROGRAM

SUMMARY

The City of Riverside has received your April 20, 2107, monitoring letter regarding the City of Riverside Rapid Re-Housing grant. The City has already begun to address the findings and concerns identified as well as make changes in City programmatic procedures for selecting, managing and monitoring the project. City staff is working with its sub-recipients, including internal City departments, to prepare a plan of action to ensure we are adhering to Riverside County's Continuum of Care and HUD's policy standards. It is our desire to operate in an efficient and productive manner that will benefit those we serve.

BACKGROUND

The City of Riverside has repeated many of the same errors within the last three monitoring periods that have taken place on the following dates: 4/10/17 (grant period: 11/01/16-10/31/17); 4/21/16 (grant period: 11/01/15-10/31/16) and 8/25/15 (grant period: 11/01/15-10/31/15). Throughout this timeframe, the following main causes impeded the project's overall success: staff overturn, scope of work unclear for program staff and lack of program management and oversight. As a result, common and repeated mistakes were made such as timeliness of claims, slow spending rate, eligibility documentation, rental calculations, income verification, reassessment of needs, HQS Inspections, and HMIS data quality.

Unfortunately, all of the program participant files the Department of Public Social Services Homeless Programs Unit has monitored thus far, were approved and managed by previous staff. It is important to note, since the roles and responsibilities has shifted to the Homeless Services Unit, there is a noticeable increase in effort and attention to the files inherited and new program participants entering program. There is evidence of attempted case management

services and efforts to rectify existing issues. City staff has participated in technical assistance trainings in addition to an extensive list of programmatic trainings identified in the plan of action below.

In your monitoring report, you identified the following concerns, findings, and recommendations to which I have included the City's Corrective Action Plan:

Fiscal Compliance:

Finding 1: Timeliness of Claims: This was a concern on the last monitoring for this grant. Per the contract terms, claims are due by the end of the month following the service month. Claims 1 & 2 were both submitted on 02/28/2017. This was a finding during the last monitoring performed during the last grant year.

Concern 1: Slow Spending: Subrecipient submitted 4 out of 12, or 33.33%, of claims have been submitted and \$24,895.66 out of \$225,612, or 11.03% of the grant has been expended, indicating slow spending.

Recommended Action: Submit a plan of action to increase spending of Grant funds, and continue to ensure that claims will be submitted timely going forward.

Corrective Action: The first two claims were submitted late due to the delay in receiving the contract. Once received, the contract needed to be signed by executive management to approve any spending on this grant.

Moving forward, we will submit monthly claims which will only include staff time regardless of when the contract is received.

Program Review:

Finding 1: Eligibility documentation. This was a concern on previous monitoring conducted on 4/21/2016.

Two of the four reviewed files did not contain required documentation for program eligibility and verification of homeless status.

- Client ID # 59710, and 68000 had no verification of homeless status, and no evidence or indication that an attempt to obtain the verification was made.

Recommended Action: Review of eligibility documentation is conducted to ensure that participant eligibility has been adequately documented upon entry to the program. In addition, this review is to assess whether the project is serving its target population. The documents and verifications must be maintained in the client file at all times. If the initial assessment is not available a new assessment needs to be conducted as verification that the client came from the target population and there is sufficient documentation of the client's homeless status. It is also recommended that City of Riverside review the

remainder of the caseload files carefully to ensure program eligibility is met under 578.3, 578.37 (a)(1)(i).

City of Riverside must take immediate action to transition the participants that did not meet eligibility under 578.3, 578.37 (a)(1)(i) to a non-CoC funded permanent housing program. Send a report to DPSS by 5/31/2017 with an updated status of this request.

Corrective Action: Program staff has received training on HUD requirements, regulations and best practices relative to Continuum of Care funded Rapid Re-Housing Programs. Topics reviewed included: Housing First model, definition of chronically homeless, homeless verification, calculating rent, verification of income, and case management best practice models. Program staff has received appropriate training and is well-equipped to operate the program and remain in compliance with all Continuum of Care funded programs.

Unfortunately, all program participant files that have been monitored thus far were approved by previous program staff. City staff is currently working on transitioning one program participant into another housing program, so she does not become homeless with her family. This transition should take place by June 6, 2017. Since the shift of program staff roles and responsibilities, all program participants have met the Rapid Re-Housing criteria and are eligible for services.

Finding 2: Housing Quality Standards (HQS). This was a finding on previous monitoring conducted on 4/21/2016.

One of four reviewed files did not contain an initial home inspection record, and one reviewed file did not contain annual home inspection. Housing leased with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title. (1) Before any assistance will be provided on behalf of a program participant, the recipient, or sub recipient, must physically inspect each unit to assure that the unit meets HQS. Client ID # 59710, and 68000.

Recommended Action: Complete and keep a record of home inspection of the unit. It is imperative that the inspection takes place prior to the participant moving into the unit. In addition, recipients or sub recipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

Correction Action: All housing units assisted with Rapid Re-Housing Program funds are inspected by the City of Riverside's HQS Inspector in compliance with 24 CFR 982.401.

Program staff is ensuring that all initial and annual inspections are being conducted as necessary. Program management staff has coordinated with the Department's Inspector to identify all program participant's anniversary dates and have placed a yearly reminder utilizing our electronic shared calendar system.

Unfortunately, all program participant files that have been monitored thus far were approved by previous program staff. Since the shift of program staff roles and responsibilities, all program participants have met the Housing Quality Standards criteria for both initial and annual assessments.

Finding 3: Income Verification and Rent Calculation. This was a concern on previous monitoring conducted on 4/21/2016.

All four of the files reviewed did not meet the General Operations compliance, specifically § 578.77 Calculating occupancy charges and rent and 24 CFR 5.609 and 24 CFR 5.611(a). Client ID# 59710, 68000, 58676 and 68003.

- There was no initial verification of income or attempts to gather income information at program entry.

- There were rent calculations completed based on assumed income and not verified income; therefore, to the computation for the client's portion of the rent cannot be verified.

- If the client has no income and the project pays 100% of the rent, a zero-income certification from the client needs to be included in the file.

Recommended Action: Ensure that rent calculations are computed accurately. Income must be calculated in accordance with HUD's regulations in 24 CFR 5.609 and 24 CFR 5.611 (a). Recipients and sub-recipients must examine a program participant's income initially and at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment. It is strongly recommended that City of Riverside take immediate action to obtain, review and keep documentation of all client's income utilizing source documents (e.g., most recent wage statements, unemployment compensation, public benefits statement, bank statement, social security award letter) as prescribed in 24 CFR 5.609 and 24 CFR 5.611 (a), and correct the deficiencies. As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income.

Corrective Action: Program staff has received training on HUD requirements, regulations and best practices relative to Continuum of Care funded Rapid Re-Housing Programs. Topics reviewed included calculating rent, verification of income, and case management best practice models. Program staff has received appropriate training and is now well equipped to operate the program and remain in compliance with all Continuum of Care funded programs.

Unfortunately, all program participant files that have been monitored thus far were approved by previous staff. Rental assistance was to be granted for an entire year without periodically assessing and the participant's income verification. Since the shift of program staff roles and responsibilities, all program participants have accurate rental calculations and acceptable income verification.

Finding 4: Reassessment of Service Needs and Client Individual Service Plans (ISP). This was a concern on previous monitoring conducted on 4/21/2016.

Three of the six files reviewed did not contain evidence of any appropriate reassessment of service needs, and evidence of referrals to mainstream resources. Client ID# 59710, 68000, and 68003.

Three of the six files reviewed did not contain Individual Service Plans. Client ID # 59710, 58676, and 68003.

Recommended Action: Review and ensure that client files contain the services and assistance provided to program participants, including evidence that the sub-recipient has conducted an annual assessment of services for those program participants that remain in the program for more than a year and adjusted the service package accordingly, and including case management services as provided in §578.37(a)(1)(ii)(F). As the project sub-recipient, City of Riverside is required under §578.75(e), §578.103(a)(7), §578.103(a)(7)(i) and §578.7S(h) to provide supportive services for program participants and document the types of supportive services provided under the program, and keep the record that these Supportive Service Plans were reviewed at least annually and that the service package offered to the program participant was adjusted as necessary. It is imperative that to ensure long-term success in permanent housing, program participants are immediately connected to appropriate supportive services; therefore, City of Riverside is advised to take immediate action to connect program participants to supportive services and make provisions for the participant's Individual Service Plan that shall comply with the ongoing assessment and recordkeeping requirements of the Coe Program in accordance with the project's application.

Corrective Plan: Program staff has received training on Reassessment of Service Needs and Client Individualized Plans. Moving forward, program staff comprehends that a Reassessment of Services must take place on a monthly basis. Program staff will ensure participants are connected to all applicable mainstream benefits and supportive services.

Concern 1: Occupancy/Lease Agreements. All four of the files reviewed had an initial lease agreement with a month-to-month term. Continuum of Care Program participants residing in permanent housing must have a lease or sublease that has a term of at least one year, is automatically renewable upon expiration for terms that are at least one month long and is terminable only for cause. HUD has determined that requiring a lease for a term of at least one year assists program participants in obtaining stability in housing. § 578.49 Leasing. (b)(S) Occupancy agreements and subleases. Occupancy agreements and subleases are required as specified in § 578.77(a).

Recommended Action: Ensure that lease, sublease or occupancy agreement for program participants meet program requirements and are in compliance with the Continuum of Care Interim Rule.

Corrective Action: Program staff will ensure that all program participants sign a one-year lease and are included in the program participant's hard files.

Concern 2: Documentation of Termination/Exit Surveys. The only one exited client file reviewed did not contain an exit survey or documentation of termination. Client ID# 59710 was exited from the program on 11/1/2016.

Recommended Action: Ensure termination documents are part of the clients' files, and complete exit surveys. HUD encourages client surveys particularly at exit to get feedback about their stay in the program. The information from the client is beneficial in assisting programs if they need to make improvements on changes in service delivery or program design.

Corrective Action: Program and management staff will ensure that all program participants are properly notified when services will end. In addition, program staff will ensure each program participant is provided with a graduation letter, exit survey and properly exited from HMIS within 14 calendar days. Should program participants refuse to participate in case management services after rental assistance has ended, they will be asked to complete a form indicating case management services have been offered and accepted or declined. Program staff has created and is currently utilizing the exit form for all program participants exiting program.

Concern 3: Project Description and Supportive Services. The City of Riverside Rapid Rehousing application indicates that participants will receive assessment of service needs, case management, employment assistance and job training would be completed by the City of Riverside on a weekly basis; however, there was no evidence of any of these services being provided to the participants.

Recommended Action: To ensure program success in removing participants from homelessness and to have a high percentage of participants maintaining housing stability, the subrecipient must provide the services described on the scope of work and the project activities must align with what was proposed in the project application.

Corrective Action: Program staff is currently providing weekly case management services to program participants willing to participate in case management services. Program management staff will be sure to make the appropriate modifications on the renewal application for the next grant period to ensure that case management services are offered monthly, not on a weekly basis.

3. **HMIS:** City of Riverside completed the HMIS Self-Assessment Survey and is compliant with HMIS privacy, data entry and training and participation guidelines.

Finding 1: Timeliness Report. This was a concern on previous monitoring conducted on 4/21/16.

The average number of days for clients to be entered into HMIS is expected to be 14 calendar days (HMIS Charter). City of Riverside PSH Chronically Homeless reports the following:

- Average Days from Entry: 26.77 days

Recommended Action: Ensure that client information is entered into HMIS within 14 calendar days from the point of the event, (intake/enrollment, service delivery, or discharge), according to the HMIS Charter. However, HUD strongly recommends the real-time data entry as best practice for reporting accuracy. It is strongly recommended for the agency to run the HMIS Data Entry Timing Report ensuring the client information (intake/enrollment, service delivery, or discharge) is recorded timely and available as up-to-date information when it is expected and needed.

Corrective Plan: All new program participants will be entered and exited into HMIS within 14 calendar days from the point of the event. Program management staff will run HMIS reports bi-weekly to ensure data timeliness and accuracy.

Finding 2: HMIS Data Quality. This was a concern on monitoring conducted on 4/21/16.

Data Quality Report-missing data quality is 0.44%. (2) Clients are missing Universal Data Element#3.917 (Number of months homeless).

Client #68003

- Annual Assessment-missing in HMIS. Last Annual Assessment completed on 1/19/2016.

Client #58677

- Project Entry Date-it is recorded in HMIS as enrollment date 12/22/15. For PH-RRH projects, this should be the date on which the client began receiving services from the project or would be otherwise considered by the project to be a participant.

Client #68000

- Annual Assessment-missing in HMIS for 2016.
- 4.17 Residential Move-in Date-the date should align with the date that client moved in (the lease)

Client #59710

- Exit form-missing in HMIS

Recommended Action: The Annual Assessment is a specialized subset of the "update" collection point. The annual assessment must be recorded no more than 30 days before or after the anniversary of the client's Project Entry Date, regardless of the date of the most recent update or annual assessment. To be counted as "Annual" for federal mandated reports, the assessment must be recorded with the type "Annual" and the data must be followed by the anniversary of the client's project entry date. It is

strongly suggested to review the date of Annual Assessment recorded in HMIS to ensure that it falls in 30 days before or after the client's anniversary date.

Corrective Action: Program staff has been completing annual assessments for the project, however, not on the program participant anniversary date. Staff has been notified of the HMIS updated features and will ensure that participants are entered on their anniversary date versus completing it annually on any given date. Calendar appointments have been placed on the Case Manager's calendar 30-days prior to each participant's anniversary date. Program staff will include this information on the weekly progress report submitted to program management staff.

PROCESS IMPROVEMENTS AND ACTIONS TAKEN OR IN PROCESS

The City is working on a detailed plan of action to correct and significantly improve the operation and management of the Rapid Re-Housing Program. This is an ongoing process. We are committed to identifying the main causes of repeated findings or concerns and appropriate actions have been implemented to eliminate the same mistakes being repeated on a yearly basis. Despite experiencing staff overturn, Rapid Re-Housing Policies and Procedures have been established and will be finalized in July 2017. In addition, weekly staff meetings have been implemented as well as weekly progress reports are being submitted to the Homeless Services Coordinator for review and discussion. Program management staff will run HMIS reports bi-weekly to ensure data timeliness and accuracy. Lastly, monthly meetings between the Homeless Services Coordinator, Case Manager and Department Inspector will take place to staff over any specific cases, identify upcoming unit inspections to ensure ongoing and regular communication.

Below is a summary of the milestone schedule and major points of the action plan that the City is currently undertaking and committed to execute.

Date	Action
October 26, 2016	Housing First Training with Philip Mangano, Dr. Sam Tsemberis and Todd Lipka
November 29, 2016	Meeting with DPSS Homeless Programs Staff <ul style="list-style-type: none"> Received technical assistance training from Homeless Programs Staff
January 31, 2017	Staff training: Streamlining access to Housing for Supportive Housing Tenants
February 16, 2017	Staff training: Property Management and Services Coordination
February 28-March 1, 2017	Staff training: Creating an Effective Homeless Response Team (Ian DeJong)
March 20, 2017	Staff training: Streamlining Access to Housing for Supportive Housing Tenants
May 22, 2017	Meeting with DPSS Homeless Programs Staff: <ul style="list-style-type: none"> Discussed monitoring held on April 10, 2017 and received

	technical assistance from Homeless Programs Staff
May 31-June 5, 2017	Staff to conduct internal audit of all program participant files (grant periods: 11/01/14-10/31/15, 11/01/15-10/31/16 and 11/01/16-10/31/17)
June 2017	Meeting with DPSS HMIS staff <ul style="list-style-type: none"> DPSS staff is currently working on system performance measures and will schedule a training after this has been completed. Exact date: TBD
July 2017	Staff is currently working on finalizing Policies and Procedures for the Rapid Re-Housing Program
Ongoing	Staff will run bi-weekly HMIS Data Reports to ensure timeliness, accuracy and data quality
Ongoing	Monthly meetings between Homeless Services Coordinator, Case Manager, and Inspector to staff cases such as upcoming inspections, etc.
August 2017	Request DPSS conduct a monitor on program (voluntary)

Although we are proud of the progress made to date, the City of Riverside appreciates your willingness to meet with staff and provide feedback on how to improve the overall success of the project. Please feel free to contact me directly at (951) 826-3931 should you have any questions or need any additional information.

Sincerely,

Monica Sapien

Monica Sapien
Homeless Services Coordinator

cc: Michelle Davis, Housing Authority Program Manager
Emilio Ramirez, Community & Economic Development Deputy Director

City of Riverside

Response and corrective action to monitoring report

Chronic Homeless Permanent Housing project

Dated May 31, 2017



Community & Economic Development Department

City Arts & Innovation

May 31, 2017

Linda Salas, Homeless Programs Unit
Riverside County DPSS Homeless Programs Unit
4060 County Circle Drive
Riverside, CA 92503

Grant Number/Contract Number: CA1055L9D081505
Grant Period: 1/1/2017 – 12/31/2017
Project Name: City of Riverside Chronically Homeless
Type of Service: Permanent Housing

Attention: Linda Salas and Rowena Concepcion, DPSS Homeless Programs Unit

RESPONSE TO APRIL 10, 2017 MONITORING FOR CITY OF RIVERSIDE CHRONICALLY HOMELESS PERMANENT HOUSING PROGRAM

SUMMARY

The City of Riverside has received your April 20, 2017, monitoring letter regarding the City of Riverside Chronically Homeless Permanent Housing grant. The City has already begun to address the findings and concerns identified as well as make changes in City programmatic procedures for selecting, managing and monitoring the project. City staff is working with its sub-recipients, including internal City departments, to prepare a plan of action to ensure we are adhering to Riverside County's Continuum of Care and HUD's policy standards. It is our desire to operate in an efficient and productive manner that will benefit those we serve.

BACKGROUND

The City of Riverside has repeated many of the same errors within the last three monitoring periods that have taken place on the following dates: 4/10/17 (grant period: 1/1/17-12/31/17); 6/03/16 (grant period: 1/1/16-12/31/16) and 8/25/15 (grant period: 1/1/15-12/31/15). The common mistakes made are: lease agreements, HQS Inspections, and HMIS data quality.

City staff has participated in technical assistance trainings, in addition to an extensive list of programmatic trainings identified in the plan of action below, to correct the common errors being made.

In your monitoring report, you identified the following concerns, findings and recommendations to which I have included the City's Corrective Action Plan:

Fiscal Compliance:

Finding 1: Match Requirements are currently not being met. No Match has been submitted for this grant thus far. This was a concern in the last grant period. Per contract requirements, match should be provided for every claim submission.

Recommended Action: Submit a plan of action indicating how Match contributions will be provided on a monthly basis in order to meet the statutory requirement of 25%.

Corrective Action: Staff has identified staff time and resources that have been dedicated to this grant and will include them as match. This revision will ensure that the City's match obligation of 25% is reflected on each claim, no longer waiting until the end of the grant period to fulfill the 25% commitment. Program management is conducting weekly supervision with program staff to discuss programmatic and fiscal aspects of the project, which include Match.

Program Review:

Finding 1: Occupancy/Lease Agreements. This was a concern on the monitoring conducted on 6/3/2016.

All four of the files reviewed had an initial 6-month term. Continuum of Care program participants residing in permanent housing must have an initial lease or sublease that has a term of at least one year, is automatically renewable upon expiration for terms that are at least one month long and is terminable only for cause. HUD has determined that requiring a lease for a term of at least one year assists program participants in obtaining stability in housing. 578.49 Leasing. (b)(5) Occupancy agreements and subleases. Occupancy agreements and subleases are required as specified in 578.77(a).

Recommended Action: Ensure that lease, sublease or occupancy agreement for program participants meet program requirements and are in compliance with the Continuum of Care Interim Rule.

Corrective Action: No new program participants have entered the program this grant period. City staff and Riverside Housing Development Corporation Property Management met to discuss this finding. Property Management has agreed to complete a new one-year lease with all program participants who initially entered a six-month lease upon move in to correct this finding. This will be completed by June 16, 2017. Both parties have also agreed that new program participants will enter an initial one-year lease upon move-in to comply with HUD's policy.

Concern 1: Housing Quality Standards (HQS). Four of four reviewed files did not contain an initial home inspection record, and one annual inspection for client ID#54322 was conducted after the 12-month anniversary. Housing leased with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title. (1) Before any assistance will be provided on behalf of a

program participant, the recipient, or sub recipient, must physically inspect each unit to assure that the unit meets HQS.

Recommended Action: Complete and keep a record of home inspections of the unit in the client file. It is imperative that the inspection takes place prior to the participant moving into the unit. In addition, recipients or sub recipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

Corrective Action: Since 2015, the City has hired a full-time Project Assistant to conduct inspections on all City affordable units, which include the Supportive Housing Program units, utilizing the Housing and Urban Development Housing Quality Standards inspection form.

Three out of the four program participants moved into their units prior to 2015. Throughout this timeframe, Riverside County Department of Public Social Services coordinated move-in and annual inspections with Riverside County Housing Authority. On April 4, 2017, City staff did attempt to reach out to the Housing Authority to request inspections prior to 2015. Housing Authority staff reported that they did not retain any copies of units inspected, as they were provided to the agency who coordinated the inspection efforts, which at that time was the Riverside County Department of Public Social Services. Program management staff has coordinated with the Department's Inspector to identify all program participant's anniversary dates and have placed a yearly reminder utilizing our electronic shared calendar system.

Two program participant's initial home inspections were located in the participant's hard file. A copy of the reports have been attached to this letter.

3. **HMIS:** City of Riverside completed the HMIS Self-Assessment Survey and is compliant with HMIS privacy, data entry and training and participation guidelines. Some HMIS data quality was missing or incorrect, and noted as follows:

Finding 1: Timeliness Report. This was a concern on monitoring conducted on 6/3/16. The average number of days for clients to be entered into HMIS is expected to be 14 calendar days (HMIS Charter). City of Riverside PSH Chronically Homeless reports the following:

- Average Days from Entry: 55

Recommended Action: Ensure that client information is entered into HMIS within 14 calendar days from the point of the event, (intake/enrollment, service delivery, or discharge), according to the HMIS Charter. However, HUD strongly recommends the real-time data entry as best practice for reporting accuracy. It is strongly recommended for the agency to run the HMIS Data Entry Timing Report ensuring the client information (intake/enrollment, service delivery, or discharge) is recorded timely and available as up-to-date information when it is expected and needed.

Corrective Plan: Moving forward, all new program participants will be entered into HMIS within 14 calendar days from the point of the event. Program management staff will run HMIS reports bi-weekly to ensure data timeliness and accuracy.

Finding 2: HMIS Data Quality. This was a concern on monitoring conducted on 6/03/16.

HMIS Data Quality:

- Missing Value Report-Barriers missing for one disabled client (#35479- assessments dated 1/22/15 and 12/01/15)
- Timeliness Report- The average number of days it takes for your organization to enter clients into HMIS is more than 14 calendar days.

HMIS Data Quality:

Client #61517

- Annual Assessment-Missing in HMIS for the year of 2016. Last Annual Assessment completed on 12/22/15 in HMIS.

Client #51608

- Annual Assessment-Missing in HMIS for the year of 2016. Last Annual Assessment completed on 6/01/15 in HMIS.

Client #22335

- Annual Assessment-Missing in HMIS for the year of 2016. Last Annual Assessment completed on 12/01/15 in HMIS.

Client #54322

- The date of Annual Assessment (3/15/16) must fall in the 60 day window of client's anniversary date.
- Annual Assessment missing for the year of 2017.

Recommended Action: The Annual Assessment is a specialized subset of the "update" collection point. The annual assessment must be recorded no more than 30 days before or after the anniversary of the client's Project Entry Date, regardless of the date of the most recent update or annual assessment. To be counted as "Annual" for federal mandated reports, the assessment must be recorded with the type "Annual" and the data must be followed by the anniversary of the client's project entry date. It is strongly suggested to review the date of Annual Assessment recorded in HMIS to ensure that it falls in 30 days before or after the client's anniversary date.

Corrective Action: Program staff has been completing annual assessments for the project, however, not on the program participant anniversary date. Staff has been notified of the HMIS updated features and will ensure that participants are entered on their anniversary date versus completing it annually on any given date. Calendar appointments have been placed on the Case Manager's calendar 30-days prior to each participant's anniversary date. Program staff will include this information on the weekly progress report submitted to program management. Program management staff will run HMIS reports bi-weekly to ensure data timeliness and accuracy.

PROCESS IMPORVEMENTS AND ACTIONS TAKEN OR IN PROCESS

The City is working on a detailed plan of action to correct and significantly improve the operation and management of the Chronically Homeless Program. This is an ongoing process. We are committed to identifying the main causes of repeated findings or concerns and appropriate actions have been implemented to eliminate the same mistakes being repeated on a yearly basis. Despite experiencing staff overturn, Permanent Supportive Housing Policies and Procedures have been established and will be finalized in July 2017. In addition, weekly staff meetings have been implemented as well as weekly progress reports are being submitted to the Homeless Services Coordinator for review and discussion. HMIS reports will be generated bi-weekly too ensure data timeliness and accuracy. Lastly, monthly meetings between the Homeless Services Coordinator, Case Manager and Department Inspector will take place to staff over any specific cases, identify upcoming unit inspections to ensure ongoing communication.

Below is a summary of the milestone schedule and major points of the action plan that the City is currently undertaking and committed to execute:

Date	Action
January 19, 2017	Meetings with sub recipients: <ul style="list-style-type: none"> • Meeting with Riverside Housing Development Corporation (RHDC) Jean Barry to discuss the importance of submitting operational invoices for the previous month by the 10th • Reviewed SHP agreement between the City and RHDC
January 31, 2017	Staff training: Streamlining access to Housing for Supportive Housing Tenants
February 16, 2017	Staff Training: Property Management and Services Coordination
February 28- March 1, 2017	Staff training: Creating an Effective Homeless Response Team (Ian DeJong)
March 20, 2017	Staff training: Streamlining Access to Housing for Supportive Housing Tenants
March 14, 2017	Meetings with sub recipients: <ul style="list-style-type: none"> • Meeting with RHDC and City staff to discuss Housing First Model • Discussed lease/occupancy agreements. Agreed to sign one year lease terms for new participants
May 22, 2017	Meeting with DPSS Homeless Programs Staff: <ul style="list-style-type: none"> • Discussed monitoring held on April 10, 2017 and received technical assistance from DPSS Homeless Programs Staff
May 26, 2017	Meeting with sub-recipients: <ul style="list-style-type: none"> • RHDC agreed to sign one year leases with all program participants who initially signed a six-month lease
June 2017	Meeting with DPSS HMIS staff <ul style="list-style-type: none"> • DPSS staff is currently working on system performance measures and will schedule a training after this has been completed. Exact date: TBD

July 2017	Staff is currently working on finalizing Policies and Procedures for Permanent Supportive Housing Programs
Ongoing	Staff will run bi-weekly HMIS Data Reports to ensure timeliness, accuracy and data quality
Ongoing	Monthly meetings between Homeless Services Coordinator, Case Manager, and Inspector to staff cases such as upcoming inspections, etc.

Although we are proud of the progress made to date, the City of Riverside appreciates your willingness to meet with staff and provide feedback on how to improve the overall success of the project. Please feel free to contact me directly at (951) 826-3931 should you have any questions or need any additional information.

Sincerely,



Monica Sapien
Homeless Services Coordinator

cc: Michelle Davis, Housing Authority Program Manager
Emilio Ramirez, Community & Economic Development Deputy Director