

**U.S. Vets CHAMPS PSH**

**Response to monitoring report and corrective action plan**

**Dated May 31, 2017**

**Kowalski, Jill**

**From:** Salas, Linda  
**Sent:** Thursday, June 29, 2017 10:57 AM  
**To:** Kowalski, Jill; Pham, Evelyn; Nelson, Tiffany  
**Subject:** FW: U.S.VETS Riverside Permanent Housing Audit Response & Corrective Action Plan, Grant Number CA0875L9D081504  
**Attachments:** U.S.VETS Riv PH Program DPSS Monitoring Response 5.31.17.pdf - Adobe Acrobat Pro(3).pdf; EXHIBIT A.pdf; EXHIBIT B.pdf; EXHIBIT C.pdf; EXHIBIT D.pdf; EXHIBIT E.pdf; EXHIBIT F.pdf; EXHIBIT G.pdf; EXHIBIT H.pdf; EXHIBIT I.pdf; EXHIBIT J.pdf; EXHIBIT K.pdf; EXHIBIT L.pdf; EXHIBIT M.pdf; EXHIBIT N.pdf; EXHIBIT O.pdf; EXHIBIT P.pdf; EXHIBIT Q.pdf

FYI

**Linda Salas, Program Specialist II**  
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**From:** Motootua Fualautoalasi [mailto:mFualautoalasi@usvetsinc.org]  
**Sent:** Wednesday, May 31, 2017 4:14 PM  
**To:** Salas, Linda <LSalas@RIVCO.ORG>  
**Cc:** Concepcion, Rowena <RConcepc@RIVCO.ORG>; Jessica Rohac <jrohac@usvetsinc.org>; Jeannette Wilson <jwilson@usvetsinc.org>; Eddie Estrada <eestrada@usvetsinc.org>  
**Subject:** U.S.VETS Riverside Permanent Housing Audit Response & Corrective Action Plan, Grant Number CA0875L9D081504

Hello Linda;

Thank you for the opportunity to response to your monitoring visit feedback conducted on 3/28/17. Attached please find the U.S.VETS Riverside Permanent Housing Audit Response & Corrective Action Plan, Grant Number CA0875L9D081504. Please note that there are 16 Exhibits attached. (EXHIBIT A – P).

Please feel free to contact our Executive Direct Eddie Estrada at 951-999-9120, Clinical Director Jeannette Wilson at 951-355-3693 or myself should you have any questions.

Thank you and have a wonderful evening.

**Tua Fualautoalasi**

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May 31, 2017

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**ATTN: Linda Salas  
County of Riverside, Dept. of Public Social Services (DPSS)  
4060 County Circle Drive, Riverside, CA 92503**

**RE: U.S.VETS Riverside Permanent Housing Audit Response & Corrective  
Action Plan, Grant Number CA0875L9D081504**

Dear Ms. Salas,

Thank you and your staff for your feedback on the monitoring visit you conducted on 3/28/17 for the U.S.VETS Riverside Permanent Housing (PH) Program (Grant Number CA0875L9D081504) funded by Department of Housing & Urban Development (HUD) Continuum of Care (CoC) Program. Please find U.S.VETS' response and Corrective Action Plan below:

**Program Review:**

**Finding 1: Eligibility documentation.** This was a consecutive Finding on two previous monitoring conducted on 1/12/2016 and 4/16/2015. Five of the six reviewed files did not contain required documentation for program eligibility; a verification of chronically homeless status, and verification of disability.

**U.S.VETS Response:**

Please note that U.S.VETS has made required changes from past audits for anything that was able to be corrected for existing files at that time and also focused on ensuring all files for new intakes are in compliance. Overall, during this 2017 audit, out of the 6 files audited, 3 veterans were enrolled in 2011, 1 veteran enrolled in 2012, 1 veteran enrolled 2015, and 1 veteran enrolled 2016.

In regards to chronically homeless status, please note that this project was originally awarded in the 2009 HUD Notice of Funding Availability (NOFA) Cycle. In 2011 the Technical Submission for this project was submitted and accepted by DPSS and HUD. Per the Household chart, 13 of the beds were identified as beds for chronically homeless veterans. This resulted in leaving 12 beds available for non-chronically homeless veterans. Based on this Technical Submission and coordination with DPSS staff and as evidenced by the executed grant agreement, both chronic and



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non-chronic disabled veterans were approved to be served by this project. U.S.VETS collaborated with DPSS staff at the time to include Susan Larkin, to implement the project in 2011. Regarding veterans transitioning from U.S.VETS Veterans In Progress Transitional Housing Program to the Riverside Permanent Housing Program specifically, U.S.VETS consulted with DPSS staff to confirm that these veterans were eligible. Subsequent renewal documents to include applications and Issues & Conditions Responses submitted by both U.S.VETS and DPSS and authorized by DPSS also indicated that 13 beds were identified for chronically homeless veterans and 12 for non-chronic disabled veterans. Therefore, of the files that were reviewed, not all files of those clients who were admitted from the beginning of the project in 2011 through June 2015 will not have documentation of chronic homelessness as they were enrolled during the years that non-chronic disabled veterans were eligible. U.S.VETS has addressed this issue as identified in the 2015 and 2016 audits, however, all veterans identified as being non-chronic were admitted during the years in which the application permitted non-chronic and therefore were permitted to enter PH from transitional housing. Also, there was no recommendation to transition the veterans out of this PH program and U.S.VETS does not believe this should be a recommendation this year since these veterans were eligible at the time of entry and have resided in these units from nearly 2 years up to 6 years. Yet, U.S.VETS does acknowledge that the FY 2015 application for the 2016-2017 program year was the first year in which all beds were to begin requiring the chronically homeless definition to be met at intake for all new intakes and has ensured since then that all intakes meet this definition as required and will continue to do so with any new intakes going forward, unless approved to admit a non-chronic disabled veteran by DPSS after due diligence has been done to fill a vacant unit with a chronically homeless veteran.

After a careful review of files audited and the additional files referenced in the monitoring report, the following was determined:

1. Client ID #28955, #10817, and #34852: These were veterans that were enrolled in 2011 and fell under the 2009 Technical Submission. (See Exhibit A.)
2. Client ID #28955: At the time of the monitoring visit, disability verification was in the file by way of the Social Security award letter stating veteran was disabled at the time of entry. (See Exhibit B.)
3. Client ID #33998: At the time of the monitoring visit, a letter from the Clinical Director (at the time) referring the veteran to this PH program and a self-certification of homelessness was in the file and the disability verification by way of the Social Security award letter showing veteran was disabled at the time of entry. (See Exhibit C.)



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The year this veteran entered the program fell under the FY 13 application (for the 2014-2015 program year) when non-chronic was permitted.

4. Client ID #42270: At the time of the monitoring visit, chronic homelessness documentation and disability verification was in the file. (See Exhibit D.)
5. The 3 other clients in HMIS noted in the monitoring report (Client ID #39069, 47061, and 17258) also entered during years in which non-chronic was permitted so coming from Transitional Housing was allowable.

**Corrective Action Plan:** U.S.VETS acknowledges and understands the HUD Notice CPD-16-11 from July 25, 2016 and will continue to prioritize eligible participants with the greatest needs for this project as beds turn over. U.S.VETS will ensure that any new intakes meet the chronically homeless definition, unless approved to admit a non-chronic disabled veteran by DPSS after due diligence has been done to fill a vacant unit with a chronically homeless veteran. U.S.VETS will ensure that all eligibility documentation is on file at time of intake.

Because this projects was never initially deemed to require 100% of clients admitted be chronically homeless, U.S.VETS respectfully requests to permit the existing veterans who were admitted into the program during the years in which non-chronic was allowable to remain in the program so as not to disrupt their housing stability and cause unnecessary distress to these veterans. However as beds turn over, U.S.VETS will ensure to dedicate beds and prioritize vacancies for veterans who are chronically homeless.

In addition, U.S.VETS has transitioned to an electronic case file system that will assist in better organizing the client file and ensure eligibility documentation is easily identifiable. To ensure eligibility requirements are met, the Permanent Housing Coordinator works with the referring agency and collects all eligibility documents prior to enrollment. The Clinical Director then verifies that eligibility documents are in the file at the time of enrollment. Moving forward, the remaining files will be carefully reviewed to ensure program eligibility is met and documentation is easily identifiable. For those missing initial assessments, a new assessment will be conducted as verification that the client came from the targeted population.

**Finding #2:** Housing Quality Standards (HQS). This was a consecutive Finding on two previous monitoring conducted on 1/12/2016, and 4/16/2015. Four of six reviewed files did not contain an initial home inspection record. Housing leased



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with Continuum of Care program funds, must meet the applicable housing and 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 #28955, 10817, 33998, and 34852.

### **U.S.VETS Response:**

Beginning as of May 2015, DPSS was conducting HQS prior to a veteran moving into this PH program, however, U.S.VETS acknowledges not realizing the HQS needed to be obtained for the client file since they were on file with DPSS. Although the charts from prior to May 2015 that were audited did not contain HQS forms at the initial intake, files audited did contain several Room Inspection forms, which is U.S.VETS' document for verifying Housing Quality Standards were met. U.S.VETS now does its own HQS Inspections as authorized by DPSS as its Permanent Housing Coordinator has been trained and additional staff will also be trained. Therefore, U.S.VETS will ensure all annual HQS Inspections are done prior to intake and annually.

**Note:** From 2011 to May 2015, client files did not contain initial and/or annual HQS records for veterans who enrolled into this PH program during that time and it was not a Concern/Finding until 2015 at which U.S.VETS and DPSS coordinated to ensure they were completed; thus HQS records prior to May 2015 will not be in the files and it will continue to be a Finding if auditors are looking for initial and annual HQS forms for clients enrolled in 2011 through 2015. However, files will and do contain Room Inspection forms verifying units do meet HQS standards and U.S.VETS will ensure all current units are done annually as well as each unit turns over and as a new unit is brought online.

**Corrective Action Plan:** U.S.VETS staff will continue to do initial and annual inspections. Initial inspections utilizing the HUD form will take place prior to move in and a copy will be placed in participant's file as well as sent to DPSS. Annual inspections will also be conducted by U.S.VETS staff prior to the participant's anniversary date and a copy will be placed in the participant's file and sent to DPSS.

All inspections from May 2015-March 2016 (initial and annual) that could be found from a central location have now been placed in the veterans' files. From March 2016 to present, all client files contain initial and annual HQS inspections. Additionally, a tracking system has been initiated to provide notification of upcoming inspections so that the inspections are completed the day before the participant's anniversary date.



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**Finding # 3: Income Verification and Rent Calculation.** This was a consecutive Finding on two previous monitoring conducted on 1/12/2016 and 4/16/2015. Three of six reviewed files 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# 28955 and 67597.

- 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; therefore, I was unable to compute and compare amounts.

**U.S.VETS Response:**

The rental calculations based on assumed income are now supported with income verification.

After a careful review of files audited the following was determined:

1. Client ID #28955: The missing income documentation has been collected and attached to the existing rental calculation. (See attachment P)
2. Client ID #67597: Veteran has \$0 income and Self- Declaration of Zero Income has been placed in client file. (See attachment P)
3. For other initial verification of income and rental calculations that were missing from the files but no Client ID number was referenced, corrections have been made and files now contain missing income documents.

**Corrective Action Plan:** U.S.VETS will ensure initial income verification is obtained upon program entry. All rental calculations prepared by the Case Managers will be verified and approved by the Program Coordinator and the Operations Team to ensure all supporting documentation is attached and rental calculations have been completed accurately. All income documents such as paystubs, SSI, retirements etc. will be attached to the rental calculations. A copy of the participant's completed rental calculation with income verification will be submitted to DPSS. Additionally, Case Managers will continue to verify income on an annual basis and complete annual rental calculation no later than the participant's anniversary date.

**Finding #4: Reassessment of Service Needs and Client Individual Service Plans (ISP).** This was a Finding on previous monitoring conducted on 1/12/16. Five 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 #28955, 10817, 33998, 67597, and 47270. Four of the six files reviewed did not contain Individual Service Plans. Client ID #28955, 10817, 67597, and 47270.





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**U.S.VETS Response:**

To make the supportive services provided more visible to the auditor, U.S.VETS will ensure that the information is documented not only in the case notes but also in the Individual Housing and Employment Plans (IHEP). IHEP's will be done at the time of entry and reevaluated every at least annually. The Program Coordinator and Clinical Director will audit all PH files to ensure that veterans' files contain initial and updated IHEP's, reassessment of services and documentation of all supportive services provided to the program participants. U.S.VETS staff will continue to engage veterans who resist participation in services to at least meet the minimum standards of the program through motivational interviewing techniques and other strategies to ensure timeliness of the reassessment for services and follow through on referrals to mainstream resources.

After a careful review of files audited the following was determined:

1. At the time of the monitoring visit, all files had referrals to mainstream services within their case notes. However since the evidence of referrals to mainstream services was not clearly identifiable in the files reviewed, U.S.VETS will ensure that the referrals are also clearly documented in the Individual Housing and Employment Plans (IHEP). For the files audited, to ensure past services provided are clear, U.S.VETS completed a document to indicate this (Exhibit E). Going forward, U.S.VETS will ensure the IHEP is utilized to centralized the information verifying reassessment of service needs and evidence of referrals to mainstream resources.
2. At the time of the monitoring visit, 4 of the 6 files audited had updated IHEP for 2017, Client ID #34852, 33998, 10817, 28955. (See Exhibit F) which is U.S.VETS version of the ISP. Client ID #47270 did not have an updated IHEP due to being discharged in 2016. Client ID #67597 is a newly enrolled veteran (12/16) with an initial IHEP (our new version of the ISP) completed in Dec 2016). (See Exhibit G.)
3. Client ID #28955: At the time of the monitoring visit, the initial Individual Action Plan (IAP) (our version of the ISP at that time) was in the participant file as well as additional IAP's. (See attachment H.)
4. Client ID #10817: At the time of the monitoring visit, the initial and annual IAP (our version of the ISP at that time) was in the participant file. (See Exhibit I.)
5. Client ID #33998: At the time of the monitoring visit, the initial and annual IAP (our version of the ISP at that time) was in the participant file. (See Exhibit J.)
6. Client ID #47270: At the time of the monitoring visit, the initial IAP (our version of the ISP at that time) was in the participant file. (See



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Exhibit K.) No annual IAP was completed for 2016 as veteran refused and then left the program.

7. Connection to mainstream benefits is evident in participants' case notes and evident by veteran's increases in income per APR benchmarks.

**Corrective Action Plan:** Monthly monitoring of files (to include the IHEP and its updates) by Program Coordinator and Clinical Director will occur to ensure veterans are being provided the services they need and that those services are documented properly.

**Finding # 5:** Documentation of Termination/Exit Surveys. This was a Finding on previous monitoring conducted on 1/12/16. The only one exited client file reviewed did not contain an exit survey or documentation of termination. Client ID# 47270 was exited from the program on 09/12/2016.

**U.S.VETS Response:**

When Client #47270 was exited from the program it was at the time U.S.VETS began implementing Eccentex MyCaseRecords (MCR) - our electronic case management system. Exit documentation was completed in MCR. However since U.S.VETS documentation is now electronic, there was an oversight in printing out the exit documents and putting in the hard copy file for the audit (See Exhibit L). As for the exit survey, the veteran left the program with no forwarding address before the Case Manager could meet with him/her to complete an exit interview. Therefore no exit survey was given to the veteran.

**Corrective Action Plan:** Case Manager will conduct an exit interview prior to each veteran leaving the program. When an exit interview cannot be conducted, Case Manager will document the reasons why the exit survey was not provided. At the time of the exit interview, Case Manager will give participant Exit Survey Letter and the Exit Survey for participant to complete and mail back to U.S.VETS. (See Exhibit M.) The Exit Survey Letter will be placed in the file to show when the exit survey was given to the veteran. As exit surveys are returned to U.S.VETS the Clinical Director will maintain them in a binder and/or electronically.

**Concern 1:** Occupancy/Lease Agreements. Six of six reviewed files 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)(5) Occupancy agreements and



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subleases. Occupancy agreements and subleases are required as specified in 578.77 (a).

**U.S.VETS Response:**

U.S.VETS acknowledges and understands the required terms for the client sublease and acknowledges an administrative oversight in past subleases. To manage for this, U.S.VETS began issuing yearly leases as of 12/2016 for all new participants. However, prior to that time for any clients who were initially on a month-to-month lease, U.S.VETS did not make it a practice to terminate any leases for clients under a year, other than when allowing a client out of a lease with no penalty upon when a client chose to leave the program or for cause (if any). For one of the files audited, client ID #67597, the initial lease is a year lease, continuing on a month to month basis after the initial year, however the incorrect lease document was mistakenly used and placed in the veteran's file. The correct lease is now in participant's file (See Exhibit N). To correct and avoid a future finding for initial leases not being year leases, U.S.VETS will complete an addendum to the leases for all existing clients to make the correction and going forward will continue to ensure that all initial leases have an initial term of at least one year from the start date with automatic renewal on a month-to-month basis.

**Corrective Action Plan:** As of 12/2016, U.S.VETS has implemented one year leases, continuing on month to month after the first year. U.S.VETS will continue to ensure that all initial lease terms with the clients have a term of at least one year, are automatically renewable upon expiration for terms that are at least one month long, and are terminable only for cause. If needed and as permitted based on feedback from DPSS, U.S.VETS can do an amendment to all past leases for current clients to adjust the term of the initial lease to be one-year from the start date with automatic renewal on a month-to-month basis.

**Concern 2:** Coordinated Entry Service (CES) Referrals. U.S.VETS is receiving referrals for this project from San Bernardino Continuum of Care which covers a different jurisdiction than what U.S.VETS Riverside Permanent Housing project is intended to.

**U.S.VETS Response:**

U.S.VETS' Riverside PH program prioritizes veterans who have been homeless in Riverside County. At times there have been instances in which a veteran was encountered in Riverside County and then placed temporarily in U.S.VETS' emergency Safe Haven housing in San



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Bernardino while pending housing placement and therefore the night be entry into the Riverside PH program may be documented as a location in San Bernardino County. U.S.VETS will ensure that veterans in these cases are processed through the Riverside CoC CES where appropriate and will not intake veterans directly from San Bernardino County without approval and documentation from the Riverside CoC CES.

Please also note for clarification purposes that when U.S.VETS was asked to send DPSS verification of how the Outreach team receives referrals from Riverside Coordinated Entry System (CES), staff mistakenly sent DPSS the referral process from San Bernardino CES.

**Corrective Action Plan:**

U.S.VETS will ensure that veterans in the above cases or others who may be referred from another CoC are processed through the Riverside CoC CES where appropriate and will not intake veterans directly from San Bernardino County without approval and documentation from the Riverside CoC CES.

U.S.VETS Outreach Team are active participants in Riverside County's CES weekly meetings and will continue to coordinate with Riverside CES. Vacancies in the Riverside PH program are reported at these weekly meetings. When a chronically homeless disabled veteran living in Riverside County is identified, they are connected and/or referred by Riverside County CES to U.S.VETS Outreach team at the weekly meetings.

**HMIS Review:**

**Finding 1:** HMIS Review. This was a consecutive Concern on two previous monitoring conducted on 1/12/2016, and 4/16/2015.

HMIS data quality was missing or incorrect, and noted as follows:

- **Timeliness Report-**The average number of days it takes for clients to be entered into HMIS after entering the project is more than 14 calendar days. Average days from Entry is 26.77 days.
- **Data Quality Report-**Missing data quality is 0.44%. (2) Clients are missing Universal data Element #3.917 (Number of months Homeless).
- **HMIS Intake forms-**Agency is now collecting HMIS data electronically; however, on the client printout there are missing Universal Data Elements: #3.6 (Gender), #3.8 (disabling condition), and #4.11 (Domestic Violence). One client record had this printout, older client records had paper intake forms.



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**U.S.VETS Response:**

All HMIS findings have been corrected utilizing the technical support provided by HMIS staff.

Timeliness: A tracking system has been developed to ensure data is entered within 14 days of program entry and annual assessments are done within the 60 day window (30 days before or after anniversary date).

Universal Data Elements: Client ID # 67597: U.S.VETS electronic data does include gender, disabling condition, and domestic violence. These sections of our data base have been printed out for the file and are routinely collected on all new participants. Non-cash benefits of SNAPs have been added to HMIS. Proof of non-cash benefits has been obtained for file.

Annual Assessments -have now been completed in HMIS which will allow the data to be collected and increases Data quality. All annual assessments have been transferred to a form provided by HMIS and placed in each veteran's file. The past timeliness issue cannot be fixed; however, data entry is expected to occur at the time of the intake and/or within 3 days. Scores on Data Entry Timeliness have continued to increase over time.

**Finding 2:** HMIS Data Quality. This was a consecutive Concern on two previous monitoring conducted on 1/12/16, and 4/16/15.

**U.S.VETS Response:**

HMIS data quality findings were due to errors made by data entry personnel and information taken from intake forms left in the file from when participants were enrolled in other U.S.VETS programs. Permanent Housing team, with the assistance of HMIS staff were able to correct the discrepancies between intake forms and HMIS.

All missed annual assessments have now been completed in HMIS and annual assessments outside the 60 day window have been corrected. All annual assessments from HMIS have been transferred to a hard copy provided by HMIS and placed in each veteran's file. Past timeliness issue cannot be fixed; however, data entry is expected to occur at the time of the intake and/or within 3 days. Scores on data entry timeliness have continued to increase over time.



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**Corrective Action Plan:** A tracking system has been developed to ensure data is accurately entered within 14 days of program entry and annual assessments are done within the 60 day window (within 30 days before or after anniversary date).

U.S.VETS electronic data does collect Universal Data Elements: #3.6 (Gender), #3.8 (disabling condition), and #4.11 (Domestic Violence). For the one client record that had this printout, the additional pages showing Universal Data Elements: #3.6 (Gender), #3.8 (disabling condition), and #4.11 (Domestic Violence) have been placed in the file (Exhibit O). In addition to completing annual assessments in HMIS, Case Managers will now complete hard copies of the annual assessments and scan it into participant's MCR file.

Overall, to address all of the above findings/concerns, U.S.VETS is also implementing corrective actions to conduct more internal audits of client files and HMIS data, especially as staff turnover occurs, to ensure compliance and repeat findings/concerns. These actions include the recent implementation of U.S.VETS' National Data Specialist who has begun to do regular audits of all U.S.VETS sites MCR electronic case records data and HMIS data to ensure data quality and consistency. U.S.VETS – Inland Empire will collaborate with this position to ensure additional emphasis is placed on monitoring client records and data for this Riverside PH program. Additionally, by having electronic records, internal auditing by U.S.VETS – Inland Empire management staff will be much more efficient and immediate and reports are also being implemented to ensure any missing information is immediately identified and corrected.

Thank you again for the opportunity to address the items from the monitoring visit. We acknowledge the areas where improvement is needed and will ensure compliance. We also hope that the clarification provided and attached documents bring resolution to majority of the findings/concerns. Please feel free to contact me at [cestrada@usvetsinc.org](mailto:cestrada@usvetsinc.org) or 915-212-0277. We look forward to continuing to work with you in serving those who served in this much-needed permanent housing program.

Respectfully Submitted,

Eddie Estrada  
Executive Director  
U.S.VETS – Inland Empire