

Housing Authority All County I and II

DPSS and review panel response dated May 18, 2017

Kowalski, Jill

From: Kowalski, Jill
Sent: Thursday, May 18, 2017 6:27 AM
To: Torno, Tanya
Cc: Marshall, Heidi; Shiner, Lisa A; Concepcion, Rowena; Angelina Coe; steve.f@cmoh.net; friddle@cityofpalmdesert.org; Salas, Linda
Subject: Response to Housing Authority re: concerns on scorecard
Attachments: Monitoring Report - CA1056L9D081505 Housing Authority Consolidated (4-4-....pdf; Monitoring Report - CA0683L9D081508 Housing Authority Consolidated All C....pdf; Monitoring Report - CA0683L9D081407 HA - Shelter Plus Care All County Co....pdf; Monitoring Report - CA1056L9D081404 HA Shelter Plus Care All County #1 (....pdf; Monitoring Report - CA0683L9D081407 HA - Shelter Plus Care All County Consolidated (10-15-15).pdf; Monitoring Report - CA0666L9D081502 Housing Authority Street to Home Chronic Homeless Project (11-28-16).pdf; Monitoring Report - CA0666L9D081401 HA Street to Home (10-7-15).pdf; Monitoring Report - CA0664L9D081502 Housing Authority EHOP (11-28-16).pdf; Technical Assistance Meeting Summary 11-7-16.pdf; HACR Response to CoC Program Scorecard 5.18.17.docx

Importance: High

Hi Tanya,

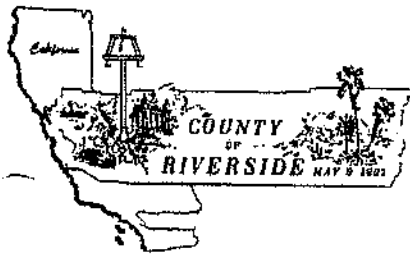
On behalf of the 2017 HUD CoC Program Independent Review Panel (IRP) and the County of Riverside Department of Public Social Services Homeless Programs Unit, attached is a response and supporting documents to your concerns related to the 2017 scorecards for HACR renewal projects (dated May 9).

The IRP discussed these concerns and provided feedback (included in the response) on May 10 and May 17. The IRP has approved the response provided.

I am including the review panel chair, Angelina Coe, vice-chair Frankie Riddle and BOG Chair Steve Falk on this email.

The attachments in this email include monitoring reports that are referenced in the attached response (the last attachment). In addition, we have also attached a summary of technical assistance provided to the HACR by DPSS on November 16, 2016.

Thank you,
Jill



Department of Public Social Services

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Susan von Zabern, Director

May 14, 2017

Housing Authority of the County of Riverside
Ms. Tanya Torno, Senior Development Specialist

Dear Tanya,

Thank you for letter dated May 9, 2017 regarding the 2017 HUD CoC Program Competition Scorecard.

A copy of your letter was provided to the 2017 HUD Independent Review Panel (IRP) at the meeting on May 10. The review panel reviewed your concerns and discussed them with DPSS staff present at the meeting.

Based on this review and copies of the monitoring reports for these projects that were provided by DPSS, the following is a response from DPSS to your concerns. This response is also provided on behalf of the Independent Review Panel:

CONCERN: Although the Scorecard did not reflect guidance on how agencies reviewed can respond, the HACR has prepared the attached response to be included under the 'Agency Comment/Explanation' column on the scorecard.

RESPONSE: *The Agency Comment/Explanation was taken from the Letter of Intent for each project submitted by HACR on April 21. This is to provide the sub-recipients an opportunity to explain their response/s to the questions in the LOI. The accuracy of the responses is verified by DPSS.*

CONCERN: Housing Authority did not receive full five points under category "Access to Mainstream Benefits and Supportive Services for Participants" which included points for agencies providing supportive services (transportation assistance, referrals to mainstream programs, conducting regular follow-up with participants, and providing SS/SSDI Technical Assistance)

- Housing Authority Consolidated (-4 points)
- Housing Authority Consolidated All County (-4 points)
- Housing Authority EHOP (-4points)
- Housing Authority Street to Home Chronic Homeless Project (-4 points)
- Shelter Plus Care Project Based with OSH (-4 points)

RESPONSE: During monitoring visits for the Housing Authority projects on November 28, 2016 and April 4, 2017, there was a program review finding because there was no documentation of supportive services plans for six (6) out of seven (7) client files reviewed; and nine (9) of nine (9) files reviewed, respectively. This was documented and discussed with the sub-recipient as a concern in previous monitoring visits and documented in monitoring reports (attached). When a monitoring visit is conducted, any issues that are found are initially addressed as concerns and discussed with the sub-recipient during an exit interview. If the issues cited as concerns are not corrected in subsequent monitoring visits, they become findings.

In addition, DPSS provided technical assistance to HACR on November 7, 2016 (see attached meeting summary) that also included discussion on Recordkeeping requirements: **"The Housing Authority must document and have evidence of services provided to the program participants such as: case management, referrals to other services, and housing service plans."**

As stated in the HA monitoring reports (attached):

"As the project sub-recipient, the Housing Authority is required under 578.75(e) and 578.103(a)(7)(i) and 578.75(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 Services Plans were reviewed at least annually and that the service package offered to the program participant was adjusted as necessary."

DPSS is both the Collaborative Applicant and Recipient of HUD CoC Program funding. In our role as recipient, we are the legal entity that acts on behalf of the County of Riverside Board of Supervisors to ensure all sub-recipients are in compliance with HUD regulations and requirements set forth in the HEARTH Act.

The Review Panel agreed with DPSS that, regardless of the MOU that is in place between the Housing Authority of the County of Riverside (HACR) and the Riverside University Health System – Behavioral Health (RUHS-BH), it does not absolve the HACR – as the contracted sub-recipient – to provide the necessary documentation in each client's file. It is the HACR's responsibility to provide proof that access to mainstream benefits and supportive services are being provided through case management to each client.

CONCERN: There were no points received under Scoring Criteria #20 'Participation of homeless in decision-making' under the Hearth Act Compliance section which "Measures whether the agency provides for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity..." across all five projects which include:

- Housing Authority Consolidated (-1 points)
- Housing Authority Consolidated All County (-1 points)
- Housing Authority EHOP (-1 points)
- Housing Authority Street to Home Chronic Homeless Project (-1 points)
- Shelter Plus Care Project Based with OSH (-1 points)

The HACR's Board of Commissioners has two vacant Resident Member seats. Eligible

applicants must be a participant in one of the Housing Authority's housing programs (which include Shelter Plus Care, Section 8, and other grant administered programs for households experiencing homelessness), be a resident of Riverside County, and have adequate time to serve. Although the two vacancies have not been filled, the HACR continue to makes continuous efforts to encourage participation and remains compliant with the HEARTH Act Compliance Requirement.

RESPONSE: *The HEARTH Act CoC Program Interim Rule states that the recipient or sub-recipient must document its compliance with the homeless participation requirements under § 578.75(g), which is as follows:*

(g) Participation of homeless individuals.

(1) Each recipient and sub-recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub-recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or sub-recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and sub-recipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

As stated in the monitoring report dated May 2, 2017, the Housing Authority did not provide DPSS with any corrective action plan to address the findings and concerns presented in the two previous monitoring reports. The first report was sent on 12/15/15 with a corrective action plan due to DPSS on 1/30/2016. Reminders were sent to the Housing Authority on 3/1/2016, and 4/18/2016. The second report was sent on April 13, 2016 with a corrective action plan due to DPSS on 5/15/2015; however, a plan was not submitted by the Housing Authority. Therefore, program requirement deficiencies have continued.

The HACR has documented that it has two vacant Resident Member seats on its Board of Commissioners, however, until a homeless and/or formerly homeless individual is represented, the score cannot be changed.

On behalf of the 2017 HUD Independent Review Panel and the County of Riverside Department of Public Social Services, thank you for submitting your concerns.

Sincerely,

Jill Kowalski, Administrative Services Manager II
Homeless Program Unit
County of Riverside Department of Public Social Services

County of Riverside Continuum of Care

DPSS Homeless Programs Unit

Technical Assistance Meeting

November 7, 2016 – DPSS Administration Building

Project: All Housing Authority of Riverside County HUD-CoC Projects

Present: Tanya Torno (HACR)
Dan Rubin (HACR)
Saira Aguiar (HACR)

Staff: Rowena Concepcion
Linda Salas

Objective: The purpose of the technical assistance meeting is to discuss CoC Program regulations, Housing Quality Standards Inspection Procedures, and items that were identified through the monitoring process, and to prevent avoiding similar issues in the future. In particular HMIS data entry, recordkeeping requirements, bed utilization, VASH, and grant expenditure.

Meeting Highlights: Effective immediately, HACR will be implementing the following:

1. Housing Inspection Procedures

- Will utilize a new inspection log provided by DPSS (see attached form)
- Will contact the project to schedule and conduct HQS inspections including scattered sites.
- Will provide a copy of the completed inspection booklet to the pertinent agency's project manager or representative.
- Will complete the monthly log and will send to DPSS HPU indicating which units have been inspected with inspection dates.
- Claims submitted to DPSS Fiscal will include the inspection log as a record of inspections conducted; there is no need to submit copies of inspection booklets to DPSS Fiscal.

2. HMIS Data

- Per HMIS Data Standards, enrollment date for permanent supportive housing participants must start on the first day the participant is housed (same date as the lease agreement).

- Clients that have been entered into HMIS but have not found housing within 90 days must be exited from HMIS immediately.
 - Housing Authority Housing Navigator must work closely with participants to locate a unit within a reasonable amount of time.
 - DPSS HPU has sent an AAQ to HUD regarding termination of assistance to program participants.
3. Recordkeeping
- The Housing Authority must document and have evidence of services provided to the program participants such as: case management, referrals to other services, and housing service plans.
4. VASH
- The HACR will review VASH data in HMIS and will exit participants that need to be exited.
5. Grant Expenditure
- HUD Grant Expenditure Report as of 9/30/16 was presented to HACR (attached).

HPU will provide the answer to the above question as soon as the information is received from HUD.