

CoC Program Performance Improvement Plan Policy & Procedure

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I. CoC Program Performance Improvement Policy and Procedure

Approved by the Membership Council on: 5/7/2018

Regulatory Citations:

24 CFR 578.7(a)(6)

24 CFR 578.85 (c)(3)

Per 24 CFR § 578.7, CoCs must monitor recipient and sub-recipient performance, evaluate outcomes and take action against poor performers. This policy establishes specific steps the Austin/Travis County CoC will take to monitor administrative requirements and evaluate program outcomes; and the resulting performance improvement planning process that is initiated when programs do not meet the CoC-established minimum performance and administrative standards.

The specific goals of the Performance Improvement Plan (PIP) process are:

- **Define roles and responsibilities:** create an intentional and systematic approach on addressing project performance centered around accountability and transparency; outlining the roles and responsibilities across the CoC related to monitoring project performance and evaluating outcomes.
- **Promote excellence in project performance:** provide clear standards and protocol through technical assistance for projects to improve project performance.

II. Policy

CoC projects that do not meet performance or administrative threshold standards will be required to participate in the Performance Improvement Plan (PIP) process.

Threshold Standards

Project grantees who meet any of the following threshold standards will be required to develop a PIP based on the following issues:

1. Performance Benchmark Standards

Projects scoring below the minimum performance standards in the Quarterly Performance Scorecard will be selected:

- 1) Projects with scores below 60 out of 100 total points.

2. HUD Administrative Standards

Grantees may be required to develop PIP Agreements to identify specific goals geared at resolving critical administrative issues. Such issues may include:

- 1) Receiving a formal audit finding by HUD or other HUD notices received from HUD Field Office that have not been resolved or will not be resolved within 30 days of ECHO receiving the notice from the HUD Field Office.
- 2) A project deobligates the lesser of 10% of the total grant amount or \$50,000 of their grant funds during the most recent fiscal year.¹

3. Formal recommendation by the Membership Council based on project priority ranking during the HUD Continuum of Care NOFA Independent Review Team (IRT) Process

- 1) The Independent Review Team (IRT) makes a recommendation on the project priority ranking for Austin/Travis County to the Membership Council based on project evaluation during the annual CoC NOFA review. The Membership Council may formally recommend a PIP based on the IRT project ranking proposal.

Results/Consequences

1. HUD Continuum of Care Funding-Local Competition

- During the first 12 months of the PIP process, projects are eligible to apply for renewal funding in the local HUD CoC Competition
- Any agency on an active PIP will not be eligible to apply for New or Bonus Project funding, unless approved by Membership Council
- Projects that have an active PIP for period of 2 consecutive years will be reviewed for involuntary reallocation of funds as per the [CoC Reallocation Policy](#).
 - See the [Reallocation Process Summary](#) (p. 10) for more details.

¹ It is an expectation that all HUD CoC grantees commit to timely ELOCCS grant draws (quarterly) and spend all awarded funding by the grant operating year-end. As noted in the CoC Deobligation Policy, if the project deobligates the lesser of 10% or \$50,000, the project renewal budget amount may be reduced to the amount of demonstrated expenditure.

III. Procedure

A. Project Selection

Agencies operating a HUD Continuum of Care Program Project will be notified if their project performance meets any of the Performance Improvement Plan threshold criteria outlined in the policy.

B. Notification Procedure

- [PIP Notification Memo](#) will be drafted by the Performance Monitoring and Technical Assistance Manager and/or an authorized staff member of ECHO and will specify the project(s) by their project name and HUD contract number and a description of specific reasons the PIP process is requested, recommendations for improvement (if applicable) and a blank PIP Agreement.
- The PIP Notification Memo will be addressed to the Executive Director, person listed as project contact on grant application, and/or other leadership staff associated with project and will be sent by email (with read receipt). Electronic notices require an acknowledgement of receipt.
- The PIP will begin on the date the notice was sent to the agency. That date will be reflected within the PIP Notification Memo and projects will need to ensure that this date is included in the PIP Agreement form.
- The letter will be distributed within 5 business days from when ECHO is aware of the project meeting selection criteria for the PIP process.

C. Appeal Process

Projects have the option to submit an appeal to Membership Council after receiving a PIP Notification Memo.

- Projects will have 14 business days to submit an appeal from the time they are notified of their eligibility. Appeals must be submitted to the Membership Council Chair by email and copy ECHO Executive Director (with read receipt).
- Membership Council Chair will notify Membership Council members of appeal request, provide documents supporting appeal request, and respond via email to the project leadership with a final decision within 7 business days.
- If the appeal is approved, the PIP request will be void. If the appeal is denied, the start date to be included on the PIP Agreement will be adjusted to reflect the date of the Membership Council's final vote.

The following information must be provided for an appeal to be considered:
<ul style="list-style-type: none">• The action or proposed action that is the subject of the appeal request and any supporting information to assist Membership Council's final decision.• Specific facts supporting that any information used to determine criteria met for a PIP is invalid or an error.• Attach a copy of the Performance Improvement Plan Notification Memo• Submit a request for appeal by email with read receipt request to:<ul style="list-style-type: none">• Membership Council Chair: Dr. Virginia Brown• ECHO Executive Director: Ann Howard

- **A project that does not submit an appeal within the timeframe is assumed to have accepted the request for the PIP process.**

IV. PIP Process

A. Development and Implementation of PIP Agreement

Projects must complete a PIP Agreement that addresses the identified performance concern outlined in the PIP Notification Memo. The PIP Agreement may be completed by any member of the agency but must ultimately be approved by the Executive Director before submission.

To ensure projects receive the best possible support to accomplish performance goals, and to ensure that the PIP Agreement is used as a tool to plan successful improvements, each PIP Agreement will be reviewed thoroughly by ECHO staff before final approval.

- The project has 30 business days to complete a draft of the PIP Agreement and to submit it to the Performance Monitoring and Technical Assistance Manager at ECHO. During this time, the project staff can schedule a meeting with ECHO for assistance with drafting the contract.
- The ECHO Performance Monitoring and Technical Assistance Manager will be the primary point of contact to provide specific written feedback to include in the final version of the PIP Agreement. The final version of the PIP Agreement must be completed and approved within 45 business days from the official start date.
- ECHO Performance Monitoring and Technical Assistance Manager will notify the project of an approved PIP Agreement no later than 5 business days from submission date.

B. PIP Agreement Criteria

PIP Agreements must address all issues of concern noted in the PIP Notification Memo including the following:

- Clear description of program performance barriers
- How the grantee intends to address the specific program issues identified
- Timeline for demonstrated improvement

The duration of the PIP cycle will be 12 months, unless otherwise noted. For example, if the start date of the PIP Agreement is October 1, then proposed PIP Agreement end date will be September 30th of the following year.

C. Monthly Reports

In addition to the PIP Agreement, projects are required to provide project updates by submitting a PIP Monthly Report. Information collected through the PIP Monthly Report will be used to provide Membership Council with the ongoing progress of achieving goals outlined in individual PIP Agreements. PIP Monthly Reports should provide detailed information regarding the implementation of Goals and Objectives identified in the PIP Agreement. Monthly reports from projects will be submitted to the designated ECHO staff (Performance Monitoring and Technical Assistance Manager) who is responsible for providing project specific updates to Membership Council when requested.

- [PIP Monthly Report Template](#)

D. Monthly Collaborative Meetings

To build understanding and collaboration around project improvements, a scheduled monthly meeting is required during the first 3 months of the PIP process. The purpose of the Monthly Collaborative Meetings is to review progress and possible barriers during PIP Agreement implementation. The meeting will be coordinated between project leadership/staff members and ECHO staff based on specific needs. After the 3rd month of the PIP process implementation, ongoing monthly collaborative meetings may or may not be required depending on progress made toward improvement goals.

Once it is determined that ongoing monthly meetings are no longer needed, ECHO staff will notify project staff by email. Cessation of monthly meetings is to reduce the demand of in person meetings but does not equate to termination of PIP Agreement. ECHO staff will be responsible for documenting meeting notes during monthly meetings and emailed to project staff for records.

E. Monitoring, Evaluation & Completion of PIP

Accomplishment of goals outlined in the PIP Agreement as reflected in the Monthly Reports will be evaluated at the end of every 90 days throughout the year term (as noted in the PIP Agreement). If ECHO staff determines that a project has sufficiently improved in the area of concern, based on the progress documented in the Monthly Report (and other evidence e.g. performance scorecards) the project leadership and Membership Council Chair and ECHO Executive Director will be notified of the completion of the PIP Agreement and no further action will be needed.

If ECHO determines that a grantee has not made adequate improvement by the termination date of the PIP Agreement, then the grantee may be required to extend the PIP for an additional 12 months. A continuing PIP Agreement may involve revision of the PIP Agreement developed by the project and/or changes to the monitoring process.

Monthly monitoring will consist of:

- Completion and submission by email of the PIP Monthly Report to ECHO staff by the 8th business day of every month.
PIP Monthly Reports are required throughout the duration of the PIP Agreement. Submission of timely PIP Monthly Reports will be taken into consideration when modifying length of time the PIP Agreement is active.
- A Monthly Collaborative Meeting with ECHO staff for the first 3 months of PIP process implementation.

Determining Successful Completion of PIP

The successful completion of a PIP process will be determined based on the following factors:

- Project participated in the required PIP process (PIP Agreement was approved within deadline, attended Monthly Collaborative Meetings, completed and submitted Monthly Reports).
- Project fully implemented identified PIP activities.
- Project made significant progress on performance goals identified in PIP Agreement.

2 Year Performance Improvement Plans

Projects that have not met their PIP goals, have not demonstrated progress in the areas targeted for improvement, or have not fully implemented all the activities identified in their PIP will be required to continue their PIP for another year. Continuing a PIP may also involve revising the plan or increasing frequency of monitoring.

If the project has not made significant progress by the 1st Quarter presentation to the Membership Council (16 months into the PIP process), the Membership Council may recommend the project voluntarily reallocate the project in the next CoC Competition or the project may be involuntary reallocated in the next competition cycle.

Reporting to Membership Council

ECHO staff will present PIP related materials to Membership Council on a quarterly basis while presenting the Austin/Travis County CoC Quarterly Performance Scorecard Summaries. Updates will include new PIP enrollments, progress of active PIPs and completed PIPs.

F. Technical Assistance

Technical Assistance activities may include training, coaching, policy review and development and other activities that ensure compliance with regulations or program standards. If appropriate, the HUD Continuum of Care & ESG Committee may be used as an expert group to share additional community and/or educational resources that may benefit the project and project staff.

Projects that require a Performance Improvement Plan will be offered Technical Assistance that may include services such as data management tools and training opportunities. The nature and extent of TA:

1. HMIS training or coaching
2. Training on best practices
3. Monitoring project data and outcomes
4. Assistance with project policy and development/implementation

V. Related References and Documents

A. The PIP process includes the following documents:

- [Performance Improvement Plan Notification Memo](#)
- [Performance Improvement Plan Agreement](#)
- [Performance Improvement Plan Monthly Report](#)

B. Measuring & Reporting Performance: Quarterly Performance Scorecards

Project performance will be monitored on a quarterly basis via the HMIS generated APR and CoC Performance Scorecards. The Performance Scorecards measure performance on several benchmark criteria and are selected based on HUD recommended performance measures. Scorecard calculations will be generated by project staff running reports from HMIS, completing the fields in the Quarterly Performance Scorecard form, and submitting documents to ECHO for final review.

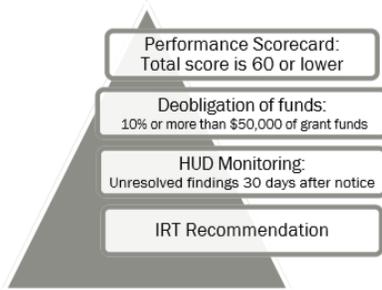
Quarterly reports are due approximately 10 days after the end of each quarter.

The quarters are as follows:

- 1 st Reporting Period: April 1 – March 31
- 2 nd Reporting Period: July 1 – June 30
- 3 rd Reporting Period: October 1 – September 30
- 4 th Reporting Period: January 1 – December 31

CoC funded projects are monitored by ECHO through data collected from HMIS or comparable database (for Domestic Violence providers). Quarterly Performance Scorecards measure performance on 12-items in which points are awarded for meeting benchmark standards. The awarded points from all 12-items are calculated so that the total number of points a project can receive is 100 points (32 for HMIS standards and 68 for Project Performance standards). Points awarded are weighed differently amongst items based on importance. For example, item 2.6 is awarded more points than other items due to HUD requirements making the use of Coordinated Entry a community priority.

C. Reallocation Process Summary



PIP Policy: Involuntary Reallocation

Projects may be placed on a Performance Improvement Plan (PIP) due to not meeting performance or administrative expectations.

If improvements are not demonstrated during the PIP process, projects may be asked to **voluntarily reallocate after 16 months**.

Agencies that decide NOT to *voluntarily reallocate* their projects **will be involuntarily reallocated during the next funding cycle if improvements are not demonstrated within the 2 years of the PIP process initiation.**



Plans to reallocate funds should as early as possible before or during the Annual NOFA Competition (starting in March).

Performance Scorecard Report Timeline			
Quarter 1: January 1 – March 31 Reporting Period: S: 4/1/2018 E: 3/31/19 Due: April 30	Quarter 2: April 1 – June 30 Reporting Period: S: 7/1/2017 E: 6/30/18 Due: July 31	Quarter 3: July 1 – September 30 Reporting Period: S: 10/1/2017 E: 9/30/18 Due: Oct 31	Quarter 4: October 1 – December 31 Reporting Period: S: 1/1/2018 E: 12/31/18 Due: January 31

↑
 Scorecard used during NOFA Competition for IRT Review

↑
 IRT begins process of reviewing, rating, and ranking Renewal Applicants