

Continuum of Care (CoC) Program Performance Improvement Plan  
Policy and Procedure

I. CoC Program Performance Improvement Policy and Procedure

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 those that underperform. 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 to address project performance centered around accountability and transparency; outline 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.
- Ensure that process is in collaboration with the organization as improvement meets community needs.

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. Below are the three standards that would place a program on a PIP.

### 1. Performance Benchmark Standards

Projects scoring below the minimum performance standards on the Quarterly Performance Scorecard will be selected. Projects that have an average of **65%** or lower on the previous 4 quarters (including the current quarter) will indicate an underperforming program therefore prompting a PIP.

### 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:

- a) 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.
- b) 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.

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

a.) The Independent Review Team (IRT) evaluates and ranks projects for Austin/Travis County as part of the Continuum of Care (CoC) NOFO review process. Based on their assessment, the IRT submits a recommended project priority numerical ranking to the Leadership Council for consideration. The Leadership Council then reviews the IRT's recommendations and has the authority to formally propose a Project Improvement Plan (PIP) if they determine that specific projects require improvements or adjustments based on the ranking and evaluation criteria.

#### Outcome

CoC Projects meeting the above threshold standards will be subject to the outcomes below until the resolution of the Performance Improvement Plan Process.

#### HUD Continuum of Care Funding-Local Competition

- Any agency on an active PIP will not be eligible to apply for New or Bonus Project funding, unless approved by Leadership Council.

- Projects that have an active PIP or have participated in a PIP within the last 12 months must seek LC approval to renew in the competition interim.

### III. Procedure

#### **A. Project Selection**

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

#### **B. Notification Procedure**

- PIP Notification Memo will be sent by the authorized staff member of ECHO and will specify the project(s) by their project name, HUD contract number, 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, persons listed as project contact on the grant application, and/or other leadership staff associated with the project, and Leadership Council Co-Chairs and will be sent by email (with read receipt). Electronic notices require an acknowledgement of receipt.
- The letter will be distributed within 5 business days from when ECHO is aware of the project meeting selection criteria for the PIP process.
- 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. If a project plans to appeal the PIP, signature is still required although the intent will be to appeal as noted in the agreement.

#### **C. Appeal Process**

Projects have the option to submit an appeal to Leadership 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 Leadership Council Chair by email and copy ECHO Executive Director (with read receipt). Email should include an attached copy of the Performance Improvement Plan Notification Memo.

- Leadership Council Chair will notify Leadership Council members of the appeal request, provide documents supporting the 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 in the PIP Agreement will be adjusted to reflect the date of the Leadership Council's final vote.

The following information must be provided for an appeal to be considered:

- Identify which of the three standards are not being met (subject of the appeal request) and any supporting information to assist the Leadership Council's final decision (scorecard in question or HUD notification).
- Specific facts supporting that any information used to determine criteria met for a PIP is invalid or an error. If scorecard performance is unrelated, the project will be given an opportunity to present to the Leadership Council on the reason for PIP.

#### IV. PIP Process

CoC Projects which are determined to have met the criteria to participate in a Performance Improvement Plan are required to collaborate with the Continuum of Care Lead Agency, ECHO, to address performance issues, resolve monitoring findings, increase funding utilization, and seek to successfully resolve programmatic concerns. Project administrators and ECHO staff have broad latitude to collaboratively design and implement technical assistance strategies to address the identified issues in alignment with the PIP Agreement.

##### **A. Development and Implementation of PIP Work Plan**

Projects must complete a PIP work plan in collaboration with ECHO staff that identifies the performance concern that is outlined in the PIP Notification Memo. The PIP work plan must be approved by the Project in question's Executive Director before submission.

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

- The project, in collaboration with ECHO staff, has 30 business days to complete a draft of the PIP Work Plan.
- The final version of the PIP Work Plan must be completed and approved by both the project and ECHO within 45 business days from the official start date.

## **B. PIP Work Plan Criteria**

PIP Work Plan 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 ways in which ECHO staff will support the project through a combination of these efforts:

- HMIS training or coaching
- Training on best practices
- Monitoring project data and outcomes
- Assistance with project policy and development/implementation

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

## **C. Reporting**

In addition to the PIP Work Plan, projects are required to provide project updates by submitting reports as agreed upon in the PIP Work Plan. Reports should reflect updates directly related to the reason for PIP such as ELOCCS, scorecards, IRT suggestions, findings, etc. Information collected through the PIP Monthly Report will be used to provide the Leadership Council with the ongoing progress of achieving goals outlined in the individual PIP Work Plan. Monthly reports from projects will be submitted to the designated ECHO staff, who are responsible for providing project-specific updates to Leadership Council when requested.

- PIP Monthly Report Template ([link](#))

## **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 (MCM)* is to review progress and possible barriers during PIP Work Plan implementation as well as determine the frequency of future meetings. The meeting will be coordinated between project leadership/staff members and ECHO staff based on specific needs. After the 3rd month of the PIP Work Plan

implementation, ongoing monthly collaborative meetings may or may not be required depending on progress made toward improvement goals.

Once it is determined by both the agency and ECHO that ongoing monthly meetings are no longer needed, ECHO staff will notify project staff by email. The cessation of monthly meetings is to reduce the demand of in-person meetings but does not equate to the termination of the 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 the PIP**

The accomplishment of goals outlined in the PIP Work Plan, as reflected in the agreed-upon update reports, will be evaluated at the end of every 90 days throughout the year (as noted in the PIP Work Plan). After 6 months, a project can be removed from a PIP if progress is seen. If ECHO staff determines that a project has sufficiently improved in the area of concern, based on the progress documented in the Reports (and other evidence e.g. performance scorecards) the project leadership, Leadership Council Chair and ECHO Executive Director will be notified of the completion of the PIP Work Plan and no further action will be needed.

If a program does not participate in collaboration with ECHO, or there is no movement on their specific goal plan by the termination date of the PIP Work Plan, then this will be identified as a negative outcome. Projects are given 3 months of initial intensive support and close monitoring of progress for the following 3 months. A continuing PIP Work Plan may involve revising the PIP Work Plan developed by the project and/or changes to the monitoring process. Projects will be given 12 months maximum support before they are exited.

Monitoring based on agreed-upon performance Work Plan will consist of:

- Submission of the PIP Monthly Progress Updates by email to designated ECHO staff by the agreed-upon timeframe. PIP Progress Updates are required throughout the duration of the PIP Work Plan.
- Monthly Collaborative Meetings, as needed, with ECHO staff during the first 3 months of the PIP Work Plan, will be ongoing as agreed.

### **F. 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 Work Plan was approved within the deadline, attended Collaborative Meetings, completed and submitted agreed upon reports).
- Project fully implemented identified PIP activities.
- Project made significant progress on performance goals identified in the PIP Work Plan.