

OFFICE OF ECONOMIC OPPORTUNITY
Emergency Rental Assistance Program – Housing Stability Services
(ERAP HSS)
Monitoring Plan Overview

Monitoring Purpose

Monitoring serves five general purposes:

- Foster open communication and partnership between the Subrecipient and the Office of Economic Opportunity (OEO).
- Provide OEO staff with an opportunity to better understand the subrecipient’s work, to become familiar with program design and operations.
- Promote the delivery of excellent services.
- Identify training and technical assistance needs within the provider network.
- Verify compliance with applicable rules and regulations.

Monitoring Guiding Principles

In support of developing effective partnerships with Subrecipients, OEO has adopted the following guiding principles:

- Mutual Respect;
- Open Communication;
- Joint Problem Solving;
- Empowerment through Diversity;
- An Ethical Code of Conduct.

Monitoring Resources

The following resources will be utilized during the monitoring process.¹

- Grant Agreement
- OEO Notice of Funding & Grant Application
- ERAP Housing Stability Services Policies & Procedures
- Emergency Rental Assistance Program regulations
 - [Statutory provisions](#)
 - [FAQ regarding the Emergency Rental Assistance Program](#) (published 2/22/2021)
 - Ongoing guidance from the U.S. Treasury
- Monthly Demographic & Utilization Reports

¹ ERAP Housing Stability Services is a short-term program through the U.S. Treasury with providers operating for now more than 3 program years.

- Quarterly program and performance reports
- Financial reporting and cash request forms

Monitoring Activities

a. Desktop Monitoring

Desktop Monitoring is ongoing and relies on information gathered in funding applications, financial and program reports, and other sources, to determine if activities are being carried out as required by the grant agreement and submitted in the subrecipient's application. As part of desktop monitoring, OEO may select one or more expenditures during the grant cycle for review.

b. Pre-Award Risk Assessment

This is done for each grant application using AHS's Risk Assessment tool. This assessment is designed to identify issues that may jeopardize the success of the project. Concerns may need to be addressed prior to grant award or trigger the need for additional reporting.

c. Financial Monitoring

A full financial monitoring will occur at least once for each subrecipient, either as part of a general review or with a focus on ERAP Housing Stability Services funding, with prioritization based on risk assessment. This monitoring seeks to:

- Protect the ERAP HSS program against fraud, waste, and abuse;
- Verify that staff have been adequately trained and have the necessary skills to properly manage ERAP HSS funding;
- Identify training or technical assistance needs;

During a financial monitoring, Agency of Human Services staff will review:

- Time sheets;
- Actual expenditures compared to the grant agreement
- Cash requests documentation;
- Financial reports;
- The accounting system;
- Written financial policies and procedures; and
- Audits performed by external auditors.

d. Programmatic Monitoring

Programmatic Monitoring will occur at least once for each subrecipient, with exceptions made on a case-by-case basis in situations such as providers who have not been able to implement the program or who may have implementation cut short. Monitoring evaluates the Subrecipient's:

- Recordkeeping and documentation to verify program compliance (e.g., Eligibility Determination form, case files, monthly and quarterly reports, etc.)

As part of the overall ERAP HSS monitoring process, OEO staff may also:

- Review the subrecipient's policies and procedures
- Interview staff
- Seek Participant/Landlord feedback

OEO will endeavor to provide the Subrecipient with a copy of a draft programmatic monitoring report within 90 days of the final monitoring meeting date. Subrecipients will be asked to get comments on the draft report to OEO within 10 business days.

e. Monitoring Frequency

The frequency of monitoring outlined in this plan is subject to change. Priority will be given to subrecipients based on one or more of the following criteria:

- Risk factors (i.e. quality of reports, complexity of scope of work);
- Grant amount;
- Monitoring through other OEO programs;
- Need as identified by OEO.

f. Monitoring tools

- Financial Monitoring tool
- Pre-Award Risk Assessment
- Staff Interview Template
- Client File Review Worksheet
- Monitoring Report Template
- Performance Improvement /Technical Assistance Plan