






Federal Monitoring Policy and Procedure Manual

Utah Office of Homeless Services
Department of Workforce Services



7.2023 v.3

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Section 1: Introduction

A. Purpose

This document is designed to outline the policies and procedures for ensuring federally funded contracts with the State of Utah Department of Workforce Services (DWS), Office of Homeless Services (OHS) are monitored correctly.

OHS staff are responsible for being aware of, understanding, and complying with the guidelines in this document. Though this document was created by merging information from the below resources, OHS staff *must* refer to the specific policy for more in-depth and updated information.

- DWS Contract Monitoring Policy
- DWS Subrecipient Monitoring Procedure
- [24 CFR 574](#)
- [24 CFR 576](#)
- [24 CFR 578](#)
- [45 CFR 260](#)
- [45 CFR 75](#)
- [2 CFR 200](#)

B. Definitions

Agreement: For purposes of this policy and the associated procedures, an agreement is a written document that defines the terms of a DWS award to a subrecipient.

Centralized Repository: The identified location for contract documents to be stored, as determined by the department. The storage is located on the I: drive or Webgrants.

Contract Analyst: DWS personnel responsible for assisting the Contract Owner through the contract process. The Contract Analyst has oversight of the technical aspects of the contract process.

Contract Owner: OHS staff are responsible for ensuring the agreement or contract is in compliance with requirements and that performance expectations are being achieved. The Contract Owner is also referred to as the Program Specialist.

Contract: For purposes of this policy and the associated procedures, a contract is a written document that defines the terms of a DWS-OHS award.

Fiscal Monitoring: Any set of activities designed to determine compliance with fiscal requirements.

Fiscal Grant Manager: DWS personnel responsible for ensuring the agreement or contract is in compliance with fiscal requirements. The Fiscal Grant Manager is the primary person responsible for fiscal monitoring.

Monitoring Activities: Any activity or review that is designed to ensure the contract or agreement is used for authorized purposes, in compliance with federal statutes, regulations, the terms and conditions of the contract or agreement, and that contract or agreement performances are achieved. Monitoring includes both programmatic and fiscal activities.

Monitoring Lead: DWS personnel responsible for organizing, leading, and carrying out the monitoring.

Monitoring Tools: Designed forms or checklists used to perform and/or document monitoring activities.

Sample (for programmatic review): A percentage of programmatic outcomes are selected and reviewed to validate program compliance. A sample size of outcome data elements (i.e., participants, cases, etc.) shall be 10% of the total but not to exceed the below case file maximums by project type for any one contract.

- Emergency Shelter: 20 case files
- Street Outreach: 20 case files
- Rapid Rehousing: 10 case files
- Homeless Prevention: 10 case files
- Transitional Housing: 10 case files
- Other: 20 case files

OHS acknowledges a minimum of 10 and a maximum of 60 case files per contract year as the floor and ceiling for all federal monitoring purposes.

Subaward: Funding provided to a subrecipient to carry out activities as part of a federal award. A subaward does not include payments to a contractor or benefits provided directly to an individual who is eligible to receive assistance from a federal program. For purposes of this policy and the associated procedures, a subaward is referred to as an agreement.

Subrecipient: An entity to which a contract or agreement is awarded by DWS to carry out a portion of a Federal Program. A subrecipient is *not* a contractor.

Uniform Guidance (2 CFR 200): The federal uniform administrative requirements, cost principles, and audit requirements for subawards of federal funds to non-federal agencies.

Section 2: Guiding Policy

A. Policy Introduction

Any federally administered funds appropriated to a subrecipient's contract (i.e., HOPWA, TANF, ESG, HIDRAF) must be monitored in accordance with DWS' Contract Monitoring Procedure and Subrecipient Monitoring Procedure. Monitoring activities are based on the level of risk assigned to the subrecipient and subaward during the pre-award process and therefore not every contract requires the same level of monitoring. This policy differs from state-only funded contracts and is a more intensive monitoring process. For guidelines on monitoring policies and procedures for state-only funded contracts, refer to the OHS' State Monitoring policies and procedures.

Federally funded contracts, including any specialized federal funding released by the HUD (i.e., ESG-CV), must be monitored according to the available federal guidance. This information can be found in specific HUD Exhibits or other information published by the federal entity or made available via technical assistance requests to the federal agency.

This policy satisfies the requirements as outlined by DWS' Subrecipient Monitoring Policy, including any applicable required waivers from that policy that are available and/or required.

Section 3: OHS Monitoring Introduction

A. Overview

Monitoring activities include, at a minimum, all activities required by the Pre-Award Risk Assessment (PARA) risk level as referenced in Section 4. For more information, refer to DWS' Pre-Award Risk Assessment policy and procedures.

To assist the OHS in carrying out monitoring activities, OHS has created funding-specific federal monitoring tools that integrate the guidance described in Section 2 and the associated funding source. These tools will be reviewed and updated on an annual basis to ensure ongoing compliance.

B. Timeline

The timeline for all required federal monitoring, regardless of funding source, can be found below. Information on what constitutes as a desk versus in-person monitoring will be discussed in Section 4.

Federal Monitoring Timeline	
Pre-Monitoring	
Desk Monitoring	In-person Monitoring
Notice letter sent from Office of Homeless Services (OHS)	Notice letter sent from Office of Homeless Services (OHS) with proposed monitoring dates
Follow-up email sent from OHS via Virtru requesting: <ol style="list-style-type: none"> 1) Policies and procedures 2) Applicable waivers 3) List of requested client case files 	Within 2 weeks (or the date provided via the notice letter) agency picks from proposed dates provided in the notice letter
<ol style="list-style-type: none"> 1) Within 1 week of notice letter date, agency uploads policies and procedures and applicable waivers to MI 2) Within 2 weeks of notice letter date, agency uploads requested client files via MI 	Email will be sent from OHS with a list of required documents (policies and procedures, applicable waivers, and client case files) via MI 3 days prior to the monitoring.
Post-Monitoring	
Based on the exit letter results, agency must take the following action(s): <ul style="list-style-type: none"> Recommendations: No response/action needed Concerns: Response needed within 30 days after receiving exit letter Findings: Response needed within 30 days after receiving exit letter 	
Response requirements for concern(s) and/or finding(s): <p>Within 30 days, agency must email Monitoring Lead and their Program Manager the following:</p> <ol style="list-style-type: none"> 1. A filled-out Federal Monitoring Results Packet with the agency's response(s) to concern(s) and/or finding(s) 2. Available times and dates for additional technical assistance <p><i>**If agency doesn't carry out the two steps required for concern(s)/finding(s), the agency poses the risk to have sanctions or corrective action pursued**</i></p>	

C. Monitoring Responsibilities

Programmatic monitoring is initiated, organized, and performed by the Monitoring Lead. The Contract Owner, Contract Analyst, Fiscal Grant Manager, and other DWS personnel may also be involved in monitoring activities as deemed necessary to provide reasonable assurance of compliance.

Fiscal monitoring is performed by the Fiscal Grant Manager and may also include the Monitoring Lead, Contract Analyst, and any other DWS personnel as deemed necessary.

When monitoring activities are conducted by a third party, the Monitoring Lead in conjunction with the Contract Owner must outline the monitoring responsibilities for the third party through a memorandum of understanding (MOU) or contract. Monitoring activities performed by a third party must demonstrate that the subrecipient has achieved the significant outcomes and deliverables in the contract/agreement.

Section 4: Federal Monitoring Procedure

A. Determining Monitoring Activities (Prior to and During Monitoring)

The Monitoring Lead will contact the Subrecipient notifying them of their upcoming monitoring at least two weeks prior to the scheduled monitoring.

The Monitoring Lead and any supportive DWS personnel will complete, at a minimum, all monitoring activities outlined under the applicable risk level. The Division Director (or designee) may approve an exception to the minimum monitoring activities due to unusual circumstances. The exception and approval must be discussed with Internal Audit (IA), documented, and stored in a central repository.

Low Risk: Two weeks prior to the monitoring, a list of requested client case files and supporting documents (i.e., policies and procedures) will be sent using Virtru, an encrypted extension to the Google platform. For low risk contracts, subawards are monitored at a minimum level for programmatic and fiscal compliance.

The Monitoring Lead and Contract Owner perform the following for low risk subrecipients:

- Training and technical assistance: Required annually at a minimum and done as needed
- Quarterly reviews (desk reviews): Includes the review of contract performance at a minimum of three times throughout the contract year.
- Claim reviews (invoice reviews): Contract Owners review each claim/reimbursement request to determine whether:
 - Items/services are provided within the agreement period
 - Amounts do not exceed agreement budget categories
 - Items/services listed are allowable per the agreement
 - Items/services and amounts are necessary and reasonable for the program/project
 - Required supporting documentation has been submitted (required documentation is based on subaward risk level)
- Programmatic and fiscal monitoring (desk audit): Required annually per agreement year. If an agreement is less than one year, one programmatic and fiscal monitoring (Desk Audit) is still required. The Monitoring Lead and any supporting DWS personnel review supporting documentation to validate quarterly (desk review) and claim reviews (invoice review). programmatic and fiscal monitoring (desk audit) may include reviewing the below and/or comparing the information to documents submitted during the programmatic and fiscal monitoring (desk audit) or claim review (invoice reviews).
 - A sample of cases (refer to sample definition in Section 1)
 - Claims/reimbursement requests

- Detailed documents or line items

The Fiscal Grant Manager performs the following for low risk subrecipients:

- Training and technical assistance: Performed as needed
- Claim reviews (invoice reviews): Fiscal Grant Manager reviews claims/reimbursement requests to determine the following:
 - Agrees to the subrecipient's general ledger
 - Items/services listed are allowable per agreement and federal award
 - Funds requested for reimbursement do not exceed the total agreement budget
- Programmatic and fiscal monitoring (desk audit): Fiscal Grant Manager reviews claims/reimbursement requests once per grant year or agreement period. If an agreement is less than a year, the Fiscal Grant Manager completes:
 - A review of supporting documentation to validate claims/reimbursement requests
- Document the fiscal component of the programmatic and fiscal monitoring (desk audit) in the contract tracking spreadsheet that is maintained by the Fiscal Grant Manager.

Medium Risk: Two weeks prior to the monitoring, a list of requested client case files and supporting documents (i.e., policies and procedures) will be sent using Virtru, an encrypted extension to the Google platform. For medium risk contracts, subawards are monitored for compliance focusing on allowable costs and programming

The Monitoring Lead and Contract Owner perform the following activities **in addition to all of the monitoring requirements listed under low risk subrecipients for medium risk subrecipients:**

- Site visit once per agreement year, regardless of whether agreement is less than a year. Site visits entail:
 - A review of supporting documentation to validate self-reported information reviewed during programmatic and fiscal monitoring (desk audit)
 - An observation of program activities
 - Verifying compliance requirements of a case sample, which may include but is not limited to staff files (i.e., BCI, Code of Conduct) and participant program files

A programmatic and fiscal monitoring (desk audit) may not be required as indicated under low risk, if self-reported information reviewed during the invoice review and technical assistance are validated during the site visit(s).

A virtual meeting utilizing technology approved by the DWS may be conducted rather than a physical site visit if the contract can be effectively evaluated and if other reasonable monitoring methods are not available. For more information, refer to the DWS' Guidance for Virtual Contract Monitoring handbook.

The Fiscal Grant Manager performs the following activities **in addition to all of the monitoring requirements listed under low risk subrecipients for medium risk subrecipients:**

- Training and technical assistance: Performed as needed
- Programmatic and fiscal monitoring (desk audit): Fiscal Grant Manager requires the Subrecipient to submit payment request invoice, general ledger, and applicable supporting documentation until at least three consecutive payment request claims/reimbursement requests have been reviewed and approved without errors.
 - Upon successful completion of the activities described above, claim reviews (invoice reviews) and programmatic and fiscal monitoring (desk audit) will follow the requirements outlined under the procedures for low-risk subrecipients

High Risk: Three days prior to the monitoring, a list of requested client case files and supporting documents (i.e., policies and procedures) will be sent using Virtru, an encrypted extension to the Google platform. If monitoring a domestic violence service provider, the OHS will send the subrecipient a list of requested client files and supporting documents (i.e., policies and procedures) seven days prior to the monitoring to allow adequate time to redact personally protected information, as required under the Violence Against Women Act and Family Violence Prevention and Services Act. High risk contract monitorings are a more intense review of financial and program data reporting.

The Monitoring Lead and Contract Owner perform the following activities **in addition to all of the monitoring requirements listed under medium risk subrecipients for high risk subrecipients:**

- An additional site visit: Totalling two during the agreement year. If agreement is less than a year, a total of one site visit is required.
- Conduct two programmatic and fiscal monitorings (desk audit) as described in the section outlining low risk subrecipients.
 - If agreement is less than a year, one programmatic and fiscal monitoring (desk audit) is required
 - A programmatic and fiscal monitoring (desk audit) will be completed during the site visits which would total two site visits and two desk audits throughout the contract year.

The Fiscal Grant Manager performs the following activities **in addition to all of the monitoring requirements listed under medium risk subrecipients for high risk subrecipients:**

- Training and technical assistance: Performed as needed
- Programmatic and fiscal monitoring (desk audit): Fiscal Grant Manager requests the Subrecipient to submit payment request invoice, general ledger, and applicable supporting documentation for each claim/reimbursement request for review and approval.

B. Post Monitoring

Program Monitoring Results and Response: Once the Monitoring Lead and any supporting DWS-OHS personnel draft and create an exit letter, results packet, report summary, and supporting materials with the results of the Subrecipient's monitoring, the Division Director (or designee) reviews monitoring results. The Monitoring Lead must elevate significant deficiencies to the Division Director or designee. Additionally, the Division Director will conduct a quarterly review (desk review) and approve monitoring progress throughout the contract year. The Division Director will indicate on the OHS monitoring tracking sheet that a review has taken place at a minimum of once quarterly. For the purpose of the monitoring exit documentation, significant deficiencies may include, but are not limited to, the following:

- Ongoing lack of compliance
- Fraud
- Issues that may cause harm to customers
- Unmet outcomes
- Liability concerns

Reporting Results to Subrecipients: Within 30 business days after the last monitoring activity, the Monitoring Lead is responsible to send the below documents that detail the results of the monitoring.

- Exit letter (see Appendix A)
- Monitoring Follow-Up Report Summary (see Appendix B)
- Federal Monitoring Results Packet (see Appendix C)

After the above documents have been sent to the Subrecipient, the Subrecipient has 30 business days to appropriately respond to any recommendations, concerns, and/or findings deemed from the monitoring. In the affiliated Subrecipient's Federal Monitoring Results Packet (see Appendix C), the Subrecipient's response must be based on the definitions below and the instructions provided in the packet.

- **Recommendations** are typically a process or a procedure that the OHS strongly suggests Subrecipients implement into their program. If a recommendation is not implemented, it may create additional deficiencies as the program continues. Recommendations do not require a response.
- **Concerns** are a deficiency in program performance not based on statutory, regulatory, or program requirements and sanctions or corrective actions are not posed. Concerns require action on the part of the agency and must then be followed up with a response within 30 days of the date the exit letter and supporting documents were sent. Concerns result in increased technical assistance, the creation of an action plan for addressing concerns, and additional oversight from the Subrecipient’s assigned Program Specialist.
- **Findings** are a violation of statutory, regulatory, valid handbook requirements, and/or written communications from the OHS. Findings require corrective action on part of the agency and must then be followed up with a response within 30 days of the date the exit letter and supporting documents were sent. If findings are not addressed and followed up with, sanctions or corrective actions can be posted. Findings result in increased technical assistance, the creation of an action plan for addressing and improving upon findings, and additional oversight from the Subrecipient’s assigned Program Specialist.

Deliverables, outcomes, and agreement requirements have been met Monitoring Lead, Contract Owner, and other supporting DWS personnel are required to communicate the results of the monitoring to the organization detailing positive outcomes and that the OHS has no recommendations, concerns, or findings.

Deliverables, outcomes, and agreement requirements have not been met Monitoring Lead, Contract Owner, and other supporting DWS personnel are required to do the below activities in addition to providing the Subrecipient with an exit letter, results packet, and report summary.

- Provide notification of monitoring results including determination of non-compliance, actions required to become compliant, and due dates to evaluate progress towards compliance
- Follow up with the subrecipient and provide technical assistance as necessary in order to bring the Subrecipient into compliance with the agreement and requirements.
 - Contact Owner must document all follow up dates and reviews
- If lack of compliance continues, the Contract Owner, their supervisor, and the Division Director (or their designee) will determine corrective action, which may include a reduction in funding, payment withholding, or termination. For more information, refer to DWS’ Agreement Termination Procedure.

If the Contract Owner identifies information supporting a potential change in Subrecipient or Subaward risk level (increase or decrease), they must submit a request for review to the Risk Assessment Team.

Section 5: Remaining Federal Monitoring Procedures

A. Program Monitoring Documentation

The Monitoring Lead and any supporting DWS personnel must keep detailed records of monitoring activities (i.e., communication) and results in the monitoring central repository. Sufficient detail is documented in a manner that monitoring results can be recreated. Documentation should include, but is not limited to, the following:

- Monitoring procedures performed, documentation reviewed, results of monitoring, follow up activities, and compliance requirements
- Who participated in the monitoring of the Subrecipient and the dates the monitoring took place

- Written justification for deviation from DWS' Contract Monitoring Policy. Any deviations must be discussed with IA and requires approval from Division Director.

The Monitoring Lead and any supporting DWS personnel shall also store monitoring documentation in the central repository monitoring folder within 30 days after each monitoring activity.

Claims/reimbursement requests are stored in the State's centralized accounting system (FINET) and not the centralized repository.

- Whenever possible, the Monitoring Lead and any supporting DWS personnel have 45 days from when the contract expires to complete monitoring and move the contract folder into the Division's archive folder.
- All monitoring documents are retained for a period of six years after agreement termination or until all audits/litigation concerning the agreement have been completed, whichever is later.

B. Program Monitoring Communication

Subrecipients must respond to monitoring correspondence within 10 business days. After the 10 day limit, the Monitoring Lead and/or Contract Owner reserves the right to follow contract terms related to agreement termination and/or default.

C. Quality Control of Monitoring Activities

Program Monitoring: The Division Director or designee conducts quality control reviews of program monitoring activities as considered necessary.

- If deficiencies in program monitoring activities are found, the Division Director or designee will work with the Monitoring Lead to ensure compliance with monitoring and documentation requirements
- Results of the quality control reviews are documented and stored with the performance records for the Monitoring Lead

Fiscal Monitoring: The Finance Director or designee conducts quality control reviews of fiscal monitoring activities as considered necessary.

- If deficiencies in fiscal monitoring activities are found, the Finance Director or designee will work with the Fiscal Grant Manager to ensure compliance with the monitoring and documentation requirements.
- Results of the quality control reviews are documented and stored with the performance records for the Fiscal Grant Manager.

Appendix A
Exit Letter Example



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Governor's Office of Planning and Budget

WAYNE NIEDERHAUSER
State Homeless Coordinator

Utah Department of Workforce Services

TRICIA DAVIS
Assistant Division Director

Date

Executive Director
Agency

RE: Contract Monitoring Results
Fiscal Years (FY): **FY 21' and FY 22'**
Funding Source: **X**
Programs: **X**

Dear **Executive Director**:

In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, CoC Program Interim Rule, and DWS policy, the Utah Office of Homeless Services (OHS) monitors all programs that receive funding through our office. As outlined in your contract, our office monitors subrecipients, addresses performance concerns, provides technical assistance, and evaluates project outcomes.

Monitoring of **agency's** contract (**number**) was conducted by OHS on **date**. Below we have broadly defined recommendations, concerns, and findings including outlined time periods for a required response.

- **Recommendations** are typically a process or a procedure that the OHS strongly suggests you implement into your program. If a recommendation is not implemented, it *may* create additional deficiencies as the program continues. Recommendations do not require a response.
- **Concerns** are a deficiency in program performance not based on statutory, regulatory, or program requirements and sanctions or corrective actions are not posed. Concerns require action on the part of the agency and must then be followed up with a **response within 30 days from the date of this report**. Concerns result in increased technical assistance, the creation of an action plan for addressing concerns, and additional oversight from your assigned Program Specialist.
- **Findings** are a violation of statutory, regulatory, valid handbook requirements, and/or written communications from the OHS. Findings require corrective action on part of the agency and must then be followed up with a **response within 30 days from the date of this report**. If findings are not addressed and followed up with, sanctions or corrective actions can be posted. Findings result in increased technical assistance, the creation of an action plan for addressing and improving upon findings, and additional oversight from your assigned Program Specialist.

At the conclusion of our monitoring, OHS has **X** recommendations, **X** concerns, and **X** findings. Please reference the attached excel file for a list and description of the recommendations, concerns, and findings. Required responses are due to the OHS within 30 days from the date of this letter and should be done through the attachment titled *Federal Monitoring Results Packet_ **agency***.

Please reach out to Lily Ward (lward@utah.gov) if you have any questions, comments, or concerns.

Sincerely,

Meredith A. Vernick, MACL
(she/her/hers)
385-479-4215
Program Manager-Homelessness Response Funding Team
State Office of Homeless Services (OHS)
Website: [Homelessness Programs](#)



Appendix B Monitoring Follow Up Report Summary Example

Monitoring Follow-Up Report Summary: Recommendations		
Name of Recipient:		
Name of Subrecipient(s):		
Grant Number:		
Staff Consulted:		
Name of Reviewer(s):		Date:
Preliminary Report Key		
Recommendation: Recommendations, thought of as "best practices," typically a process or procedure that the OHS strongly suggests your agency implements into the designated program. If a recommendation is not implemented, it may create additional deficiencies as the program continues. Recommendations will be watched and monitored in follow-up visits with your assigned Program Specialist.		
Concern: Concerns are a deficiency in program performance not based in statutory, regulatory, or program requirements where sanctions and corrective actions are not pursued. Concerns require action on part of the agency and must be followed up with a response within 30 days of the date of this report. Concerns result in increased technical assistance and additional oversight from your assigned Program Specialist.		
Finding: A violation of statutory, regulatory, valid handbook requirements, and/or written communications from the OHS. Findings require action on part of the agency and must then be followed up with a response within 30 days of this report. If findings are not addressed and followed up with, sanctions or corrective actions can be pursued. Findings result in increased technical assistance and additional oversight from your assigned Program Specialist.		
Monitoring Recommendations	Basis of Recommendation	Notes
1		
2		
3		
4		
5		

Appendix C
Federal Monitoring Results Packet Template

XXX
**Monitoring
Results**

2023



DATE

Reporting Period:
XX, XXXX - XX, XXXX
Funding Source: XXX





Governor's Office of Planning and Budget

WAYNE NIEDERHAUSER
State Homeless Coordinator

Utah Department of Workforce Services

TRICIA DAVIS
Assistant Division Director

XXX, XXXX

Executive Director Name
Agency

RE: Contract Monitoring Results
Fiscal Years: XXX
Funding Source: XXX
Programs: XXX

Dear XXXX (agency) staff:

We completed our required federal monitoring of XXX's (agency) XXX (funding source)-funded contract with the Office of Homeless Services (OHS) for the period X X, XXXX through X X, XXXX. The scope of this monitoring is outlined in Section 4 of the OHS Federal Monitoring Policies. The monitoring was conducted in accordance with the guidelines outlined in the below resources.

- DWS Contract Monitoring Policy
- DWS Subrecipient Monitoring Procedure
- OHS Federal Monitoring Policy
- [24 CFR 574](#)
- [24 CFR 576](#)
- [24 CFR 578](#)
- [45 CFR 260](#)
- [45 CFR 75](#)

The OHS is responsible for conducting a monitoring that is considered necessary to meet the statutory regulations of the HUD and each individual funding source. Furthermore, through these monitorings, the OHS aids in the development of evidence-based solutions to any recommendations, concerns, and findings as a result of the monitoring.

As a result of the monitoring, XXX (agency) is responsible for carrying out the below activities.

Post-Monitoring

Based on the exit letter results, agency must take the following action(s):

Recommendations: No response/action needed

Concerns: Response needed within 30 days after receiving exit letter

Findings: Response needed within 30 days after receiving exit letter

Response requirements for concern(s) and/or finding(s):

Within 30 days, agency must email lward@utah.gov and mvernick@utah.gov the following:

1. A filled-out Federal Monitoring Results Packet with the agency's response(s) to concern(s) and/or finding(s)
2. Available times and dates for additional technical assistance

If agency doesn't carry out the two steps required for concern(s)/finding(s), the agency poses the risk to have sanctions or corrective action pursued

Sincerely,
Meredith A. Vernick, MACL
(she/her/hers)
385-479-4215
Program Manager-Homelessness Response Funding Team
State Office of Homeless Services (OHS)
Website: [Homelessness Programs](#)



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Concern 2 X

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APPENDICES X

INTRODUCTION

2 CFR 200.200, 2 CFR 200.332(d), and the State of Utah, Division of Purchasing-Contract Administration and Monitoring Guide require the Department of Workforce Services (DWS) Office of Homeless Services (OHS) to monitor the compliance and performance of its appropriated funds.

The monitoring conducted as a response to the above statutory regulations was conducted to assist subrecipients with the compliance of the federal guidance notated below.

- [24 CFR 574](#)
- [24 CFR 576](#)
- [24 CFR 578](#)
- [45 CFR 260](#)
- [45 CFR 75](#)

PROCEDURES

On **X X, XXX**, OHS reached out to **XXXX** via email notifying them of an upcoming required federal monitoring of their agency. Within this notice, subrecipients were informed of the funding source and associated projects that the monitoring would encompass. Furthermore, subrecipients were provided with a timeline of the monitoring process and given further instruction based on the type of monitoring (refer to the OHS Federal Monitoring Policy).

X client files were requested (refer to the OHS Federal Monitoring Policy), along with any policies and procedures that demonstrated compliance with the associated funding source.

Next, **during the month of X**, the OHS performed a federal monitoring of **XXX's** (agency) **XXX** (funding source)-funded contract for the period **X X, XXXX** through **X X, XXXX**. This monitoring consisted of the following activities:

- Review of agency's policies and procedures
- Review of agency's policies and procedures for the specific funding source being monitored
- Review of requested client files to ensure eligibility and compliance

MONITORING RESULTS

Monitoring of **XXX**'s (agency) contract (**XXX**) (contract number) was conducted by the OHS on **XX/XX/XXXX** (date). At the conclusion of the monitoring, the OHS has **X** recommendations, **X** concerns, and **X** findings. Below we have broadly defined these terms.

- **Recommendations** are typically a process or a procedure that the OHS strongly suggests you implement into your program. If a recommendation is not implemented, it *may* create additional deficiencies as the program continues. Recommendations do not require a response.
- **Concerns** are a deficiency in program performance not based on statutory, regulatory, or program requirements and sanctions or corrective actions are not posed. Concerns require action on the part of the agency and must then be followed up with a response within 30 days of the date of this report. Concerns result in increased technical assistance, the creation of an action plan for addressing concerns, and additional oversight from your assigned Program Specialist.
- **Findings** are a violation of statutory, regulatory, valid handbook requirements, and/or written communications from the OHS. Findings require corrective action on part of the agency and must then be followed up with a response within 30 days of this report. If findings are not addressed and followed up with, sanctions or corrective actions can be posted. Findings result in increased technical assistance, the creation of an action plan for addressing and improving upon findings, and additional oversight from your assigned Program Specialist.

As stated under the OHS Federal Monitoring Policy and the definitions noted above, **XXX** (agency) is required to follow up with the OHS on concerns and findings within 30 days of the date of this report. As such, in this packet, you will find space to respond to any recommendations, concerns, and/or findings, though a response is only required for concerns and findings. Additionally, if concerns and/or findings were found at the conclusion of the monitoring, **XXX** (agency) is required to create an action plan. Please follow the instructions in the response space provided to ensure that your action plan follows OHS Federal Monitoring Policy guidelines. Lastly, both concerns and findings result in additional technical assistance or virtual communication. **XXX** (agency) is responsible for communicating dates and times for additional technical assistance.

Recommendations

As a reminder, recommendations are typically a process or a procedure that the OHS strongly suggests you implement into your program. If a recommendation is not implemented, it may create additional deficiencies as the program continues. Recommendations do not require a response; however, a response space has been provided in the event that you choose to respond to the OHS's recommendation(s). For more information, navigate to the email attachment titled *ESG Monitoring Follow-Up Report Summary_XXX (agency)*.

Recommendation 1: XXX.

During the monitoring administered by the OHS, it was found that XXX.

Agency Response

--

Responsible Individual: XXXX

Anticipated Completion Date: XX/XX/XXXX

Recommendation 2: XXX.

Upon reviewing XXX's XXX.

Agency Response

--

Responsible Individual: XXXX

Anticipated Completion Date: XX/XX/XXXX

Recommendation 3: XXX.

During the OHS's monitoring of XXX, it was noted that XXX.

Agency Response

--

Responsible Individual: XXXX

Anticipated Completion Date: XX/XX/XXXX

Recommendation 4: XXX.

During the OHS's monitoring of XXX, it was found that XXX.

Agency Response

--

Responsible Individual: XXXX
Anticipated Completion Date: XX/XX/XXXX

Recommendation 5: XXX.

During the OHS's monitoring of XXX, it was found that XXX.

Agency Response

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Responsible Individual: XXXX
Anticipated Completion Date: XX/XX/XXXX

Concerns

As a reminder, concerns are a deficiency in program performance not based on statutory, regulatory, or program requirements and sanctions or corrective actions are not posed. Concerns require action on the part of the agency and must then be followed up with a response within 30 days of the date of this report. Concerns result in increased technical assistance, the creation of an action plan for addressing concerns, and additional oversight from your assigned Program Specialist. Please follow the below instructions to ensure that your action plan follows OHS Federal Monitoring Policy guidelines. Lastly, please contact your assigned OHS Program Specialist, as XXX (agency) is responsible for initiating additional oversight from their Program Specialist within 30 days of the date of this report. For more information, navigate to the email attachment titled *ESG Monitoring Follow-Up Report Summary_XXX (agency)*.

Concern 1: XXX.

During the OHS's monitoring of XXX, XXX.

Agency Response

Instructions: Please provide a response on how the concern will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

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Responsible Individual: XXXX
Anticipated Completion Date: XX/XX/XXXX

Concern 2: XXX.

During the OHS's monitoring of XXX, XXX.

Agency Response

Instructions: Please provide a response on how the concern will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

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Responsible Individual: XXXX
Anticipated Completion Date: XX/XX/XXXX

Concern 3: XXX.

During XXX's monitoring, it was found that XXX.

Agency Response

Instructions: Please provide a response on how the concern will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

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Responsible Individual: **XXXX**
Anticipated Completion Date: **XX/XX/XXXX**

Concern 4: XXX.

During **XXX's** monitoring, **XXX.**

Agency Response

Instructions: Please provide a response on how the concern will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

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Responsible Individual: **XXXX**
Anticipated Completion Date: **XX/XX/XXXX**

Concern 5: XXX.

During **XXX's** monitoring, **XXX.**

Agency Response

Instructions: Please provide a response on how the concern will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

Responsible Individual: **XXXX**
Anticipated Completion Date: **XX/XX/XXXX**

Findings

As a reminder, findings are a violation of statutory, regulatory, valid handbook requirements, and/or written communications from the OHS. Findings require corrective action on part of the agency and must then be followed up with a response within 30 days of this report. If findings are not addressed and followed up with, sanctions or corrective actions can be posted. Findings result in increased technical assistance, the creation of an action plan for addressing and improving upon findings, and additional oversight from your assigned Program Specialist. Please follow the below instructions to ensure that your action plan follows OHS Federal Monitoring Policy guidelines. Lastly, please contact your assigned OHS Program Specialist, as **XXX** (agency) is responsible for initiating additional oversight from their Program Specialist within 30 days of the date of this report. For more information, navigate to the email attachment titled *ESG Monitoring Follow-Up Report Summary_XXX* (agency).

Finding 1: XXX.

During the OHS's monitoring of **XXX**, it was found **XXX**.

Agency Response

Instructions: Please provide a response on how the finding will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

Responsible Individual: **XXXX**
Anticipated Completion Date: **XX/XX/XXXX**

Finding 2: XXX.

During the OHS's monitoring of XXX, it was found that XXX.

Agency Response

Instructions: Please provide a response on how the finding will be remedied, who it will be remedied by, and in what time frame it will be remedied. Your OHS assigned Program Specialist will work with you to ensure that the response you provide below is discussed and implemented in the additional technical assistance as required under OHS Federal Monitoring Policy guidelines.

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Responsible Individual: XXXX
Anticipated Completion Date: XX/XX/XXXX

CONCLUSION

This report is intended solely for the information and use of XXX's (agency) management. All or part of this report may be classified as private, protected, or confidential in accordance with the Utah Government Records Access Management Act. If you are not the intended recipient, please do not print, copy, retransmit, disseminate, or otherwise use the information presented in this report.