# The Community Partnership for the Prevention of Homelessness

# **Program Monitoring Plan**



#### **Overview:**

The Community Partnership for the Prevention of Homelessness (TCP) created this document for providers to outline its policy and procedures for monitoring contract compliance, investigating client grievances and unusual/critical incidents.

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#### **1. PROGRAM MONITORING AND RISK ASSESSMENT PLAN**

TCP will monitor the programs it funds using a variety of methods and tools. These methods and tools will ensure:

- Providers are in compliance with the terms of their contracts with TCP;
- Clients are served in accordance with programs' Department of Human Services (DHS) approved program rules;
- Clients are served in accordance with the Homeless Services Reform Act of 2005 (HSRA) including any amendments enacted since its passage and all other relevant legislation and/or policies;
- Program facilities are appropriately maintained.

The methods that TCP will employ to monitor each of its subcontractors are:

- Desk Audits
- Site Visits
- Deliverable Review Checklists
- Deficiency Notices

#### 2. DESK AUDITS

A Desk Audit is a form of contract monitoring that is conducted without TCP staff visiting a program site or administrative office. Desk Audits are as consequential as site visits. A Deficiency Notice or Corrective Action Plan can result from this type of contract monitoring. A Desk Audit can be conducted with or without an announcement to the executive director or program leadership. Findings of Desk Audits will be communicated to the executive director and/or program leadership via email in the form of a formal report.

The list below outlines the information that is reviewed in a Desk Audit:

- Master Contract Deliverables During the completion of a Desk Audit, TCP will complete
  a review of all submitted Master Deliverables for the identified program's contract in
  effort to ensure that all Master Deliverables have been received and accepted by TCP.
  (Please see the information listed in section fifteen (15) of this document to see the full
  list of these items).
- **Tier One Contract Deliverables** During the completion of a Desk Audit, TCP will complete a review of all submitted Tier One Deliverables for the identified program's contract in effort to ensure that all Tier One Deliverables have been received and accepted by TCP. (Please see the information listed in section fifteen (15) of this document to see the full list of these items).
- Homeless Management Information System (HMIS) Records

Approximately 10% of the client roster (unless a Desk Audit is completed following receipt of a client complaint) is selected at random and audited in the HMIS. When completing a Desk Audit following receipt of a client complaint, TCP audits 50% of the client roster. The following information is reviewed in the HMIS during the completion of a Desk Audit:

i. Data Completeness and Congruity- TCP requires its providers to maintain a data completeness percentage of at least 90% in the HMIS. During a Desk Audit, TCP

staff will run a Data Completeness Report in the HMIS for the identified program in effort to ensure compliance with data completion for all program participants. A copy of the Data Completeness Report is provided via email to the executive director and/or program leadership along with the formal report outlining the findings from the Desk Audit.

- ii. **Case Plans** TCP reviews the active case plans in the HMIS for clients audited. A review of active goals, goal classifications, goal descriptions and goal target dates are reviewed and documented.
- iii. **Case Notes-** Providers are required to have at minimum, one case note present per month, per active goal. TCP reviews the frequency at which case notes are entered as well as its content to ensure that case notes clearly capture client interactions, case manager observations as well as next steps as outlined in TCP's Effective Case Note Guide.
- iv. Action Steps- Providers are required to have at least one action step in progress per active goal with a documented target date. The frequency at which action steps are entered as well as the corresponding target dates are reviewed and documented.
- v. **SPDAT Assessments**-The frequency at which SPDAT Assessments are completed in the HMIS as well as assessment results are reviewed and documented.
- Housing Participant and Assessment Reports (HPARs)-TCP requires its providers to complete at minimum, one home visit per month for all program participants in scattered site programs. Providers are required to document their observations including but not limited to what was discussed with the client during the home visit, unit maintenance issues (if applicable), progress with case plan goals, as well as any interventions utilized in the Housing Participant and Assessment Report (HPAR). HPARs are required to be submitted to TCP via an identified database at minimum, once per month for all program participants. Compliance with the completion of this report at the required frequency is reviewed and documented in the audit report.
- Housing Quality Standard (HQS) Inspection Reports: This document is requested for clients in scattered site programs that live in apartment units throughout the District. During the time in which a Desk Audit is completed for a scattered site program, an updated HQS Inspection Report is requested for the identified program participant(s) in effort to ensure that client dwelling units are consistent with federal housing quality standards. TCP requires its scattered site programs to complete HQS inspections at the time in which a client moves into a unit and annually thereafter. Compliance with this requirement is documented in the audit report.
- Training Compliance-Copies of Training Transcripts outlining the number of trainings completed by staff (selected at random) within the contract period in which the audit is conducted is requested and reviewed by TCP in effort to ensure compliance with the training requirements outlined in the program's contract. Findings and observations are documented in the audit report.
- Facility Operation Protocols- Documents applicable to the operation of the facility in which services are rendered (office spaces and/or program sites) including but not limited to fire safety inspection reports as well as the servicing of fire extinguishers are reviewed and documented.

• Displayed documents/postage- Required postings at the program site and/or offices including but not limited to the display of updated program rules, grievance protocols, COVID-19 guidelines, language access and Americans with Disabilities Act (ADA) postings are reviewed during the completion of a Desk Audit. Providers are required to complete and return TCP's Virtual Audit Checklist to confirm that all required postings are displayed in the facility in which services are rendered. Providers are additionally required to provide corresponding photos to confirm that all required postings are displayed in the facility as indicated on the Virtual Audit Checklist. (Please reference Attachment A of this document).

#### **3. ANNOUNCED VISITS VS. UNANNOUNCED VISITS**

Announced site visits and unannounced site visits are both done to ensure adherence to the requirements of the providers' contracts and relevant legislation and policy. All site visits will be conducted by TCP. There may be times in which TCP will be accompanied by funding agencies and other entities including but not limited to the District of Columbia Department of Human Services (DHS) or the US Housing and Urban Development (HUD).

Providers will have 24-48 hours' notice for announced site visits. Notice will be communicated to the executive director and/or program leadership, in writing via TCP's Site Visit Announcement Notice. (Please reference Attachment B of this document). The executive director and/or program leadership must respond by 5pm EST on the date in which the written notice of the announced visit is provided to confirm the visit or request that the visit be rescheduled. If a response is not received within the designated timeframe, TCP will assume confirmation and will conduct the site visit as scheduled.

TCP provides short notice of scheduled site visits because the intent of a site visit is to observe program operations as they happen on a regular basis. In most cases, rescheduling a scheduled site visit will not be permissible. However, TCP understands that there may be instances where this is necessary. Listed below are reasons that are acceptable for the request of rescheduling a site visit.

- Agency is closed
- An audit from another funding entity is being completed within two (2) weeks of the visit requested by TCP (Not permissible in the event of complaint/grievance investigations within the critical or major nonconformance categories).
- There will be no provider/program leadership available on the day of the visit due to scheduled leave or meeting imperative to the operation of the program. (Not permissible in the event of complaint/grievance investigations within the critical or major nonconformance categories).
- COVID-19 and/or other public health emergency restrictions

Unannounced site visits are site visits that are conducted to monitor contract compliance without providing advance notice to the executive director and/or program leadership. Upon arrival to the program, the TCP Staff present will identify themselves, present the proper TCP identification and request to speak with the executive director and/or program leadership as well as provide an explanation of the visit. TCP Staff will coordinate with the program staff present to conduct a tour of the facility as outlined in section 5 of this document as well as a review of program records as outlined in section 7 of this

document. Any documents not available or inaccessible at the time of the site visit must be submitted electronically within five (5) business days of the visit.

#### 4. Site Visits

TCP may conduct a site visit to investigate client grievances, unusual incident reports, client fatalities and/or monitor contract compliance. Visits to programs sites for the aforementioned reasons may be announced or unannounced.

#### To assess the need for monitoring, TCP will prioritize a site visit as outlined in Attachment C of this document.

#### 5. Items Reviewed During an On-Site Visit

#### Facility

Site visits conducted at site-based programs will include a tour of the program facility by TCP staff. TCP will check for the following:

- Accessibility and ADA Compliance Entryways and other areas of the facility will be reviewed to ensure compliance with the proper spacing for a person with mobility needs, the presence of proper equipment or the adequate spacing in an area to safely exit a person with a physical or mobility need in the case of an emergency. TCP staff will also check to ensure that the facility has the countertops and other items such as locks or doorknobs, and the proper toilet and bathing needs in the unit. Additionally, providers will also be questioned on the procedures to be followed when a person needs an accommodation.
- Fire drill logs Detailed records of the completed fire drills for applicable programs. The records should include the date, time and weather of the day that the drill was completed as well as the number of persons that participated in the drill (broken down by staff, adult clients and clients that are children). Records should also include if there were persons with mobility issues that were assisted with exit during the drill. Fire Drills are to be completed monthly by applicable programs. Please see your contract for more information on your program's required completion of fire drills.
- Fire extinguishers Tags are reviewed for the date of the last inspection/service completed as well as the fire safety compliance report provided by the local fire marshal. Fire extinguishers should be inspected and certified annually by a fire protection equipment company or the local fire marshal. A complete breakdown and internal inspection must be completed annually. Annual inspections shall only be done by a fire protection equipment company or the local fire marshal. Verification of the inspection will be noted on the fire extinguisher itself by the tag found hanging from the tank of the extinguisher.
- Fire Safety Inspection This is to be completed annually by the fire marshal and the record is to be maintained by the site. To obtain an inspection, you can visit <a href="http://fems.dc.gov/service/fire-prevention-inspection">http://fems.dc.gov/service/fire-prevention-inspection</a>.

FEMS.DC.GOV states: Inspection of residential dwellings is available by appointment. These inspections are conducted as a courtesy of the DC Fire and Emergency Medical Services (F&EMS) Department's Firefighting Division. A copy of the inspection will be provided with suggestions. A follow up appointment may also be requested. Our goal in providing this service is to make sure that residential dwellings are free from fire hazards and safety violations. Call (202) 673-3331. As facilities that are owned or leased by the District of Columbia may not have this record on file, providers are directed to provide TCP with documented contact attempts such as copies of emails to the Department of General Services or other applicable entities requesting such information in effort to confirm compliance with this protocol.

- Smoke detectors Smoke detectors must be present in all communal areas as well as in the sleeping/living quarters of the clients. During a site visit, smoke detectors will be assessed by TCP staff in effort to ensure operation. Smoke detectors must be designed for persons who are hearing impaired. Should you need a smoke detector please visit <u>http://fems.dc.gov/service/free-smoke-detectors</u>.
- Emergency Evacuation Route This is the route in which program participants will need to follow in the event of an emergency. It should point out where the person is on the map by stating, "You are here" or providing some other identifying mark to indicate the viewer's location and arrows pointing in the direction of the route to follow from the point in which the person is looking at the map. This document should be posted on the walls throughout the facility near exit signs, doors and stairwells.
- Exit Signs These should be posted throughout the facility pointing to exits. Exit signs must be clearly visible. If the signs are equipped with lighting, each sign must be lit by at least one lightbulb.
- **COVID -19 Guidelines-** TCP staff will review the COVID-19 guidelines implemented at the program site. This may include the review of social distancing markers on the floor, sanitizing stations as well as the accessibility of face masks.
- Extermination/Pest control receipts These documents should be maintained by the site when pest control should have to visit the facility. As facilities that are owned or leased by the District of Columbia may not have this record on file, providers are directed to provide TCP with documented contact attempts such as copies of emails to the Department of General Services or other applicable entities requesting such information in effort to confirm intent to comply.
- Maintenance request/Service Logs Records of request for service and the verification that the services have been completed. As facilities that are owned or leased by the District of Columbia may not have this record on file, providers are directed to provide TCP with documented contact attempts such as copies of emails to the Department of General Services or other applicable entities requesting such information in effort to confirm intent to comply.

Additional requirements may apply based on program type. Requirements by provider type are listed below:

#### Low Barrier Shelters

- Grounds (Indoor and outdoor)
- Entry of the facility The doors and entry way of the building will be observed. The same guidelines from above will apply.
- Security stations/posts The presence of the required security posts will be observed

- Intake space The area utilized to complete client intakes will be observed. The presence of Language Access/Interpreter Services Available postings will also be observed.
- Posting of DHS Approved Program Rules in all communal areas
- Posting of evacuation plans on each floor of the facility
- Posting of the Client Grievance Protocols in all communal areas
- Dining area The area utilized to serve meals will be observed.
- Kitchen The area utilized to prepare meals will be observed. A list of all Certified Food Handlers will be requested, reviewed and documented.
- Sleeping quarters/Dorms The areas that are utilized for clients to sleep will be observed. The ability to accommodate transgender and gender nonconforming clients as needed as well as ADA accessibility and applicable social distancing protocols will be documented.
- Client storage Lockers, footlockers and other areas for client storage will be observed.
- Agency storage The area that is utilized by the agency to store items such as linens and other client goods to be distributed will be observed.
- Bathrooms/Showering Stations TCP staff will ensure that toilets, sinks and showers are operable and that hot water is available. TCP staff will also observe the ability to accommodate transgender and gender nonconforming clients as well as the presence of operable ADA showers.
- Communal space The area that is allowed for recreational purposes will be observed. Applicable social distancing protocols will be observed and documented.
- Onsite laundry facilities The area that is utilized for washing and drying will be observed (if applicable).
- Staff offices
- File storage area The area of the facility that is utilized to store client files. TCP staff will also review and document the utilization of a double locked setting to store such information.

Temporary Shelter

- Grounds (indoor and outdoor)
- Entry of the facility The doors and entry way of the building will be observed. The same guidelines from above will apply
- Front Desk/Check in Area-The presence of language access documents, including the "Interpreter Services Available" poster will be observed and documented.
- Communal space The area that is allowed for recreational purposes will be observed.
- Kitchen The area utilized to prepare meals will be observed. A list of all Certified Food Handlers will be requested, reviewed and documented.
- Posting of evacuation plans on each floor of the facility
- Case management offices
- File storage area The area of the facility that is utilized to store client files. TCP staff will also review and document the utilization of a double locked setting to store such information.
- Client units or Bedding Areas All items on the list below may not be applicable
  - Blinds/screens
  - o Hot water
  - Functioning Toilets
  - Closets/storage
  - o Secure unit door
  - Living space adequate for family size
  - Sleeping quarters Where clients sleep including the ability to accommodate transgender and gender nonconforming clients as needed as well as ADA accessibility.

- Bathrooms- TCP staff will ensure that hot water and toilets are functioning as well as the ability to accommodate transgender and gender nonconforming clients as needed. TCP staff will also observe ADA accessibility.
- Posting of resources
- Communal areas

Site Based Programs (transitional, permanent supportive housing, or rapid rehousing)

- Grounds (indoor and outdoor)
- Entry of the facility The doors and entry way of the building will be observed. The same guidelines from above will apply.
- Front Desk/Check in Area-The presence of language access documents, including the "Interpreter Services Available" poster will be observed and documented.
- Hallways
- Posting of evacuation plans on each floor of the facility
- Case management offices
- File storage area The area of the facility that is utilized to store client files. TCP staff will also review and document the utilization of a double locked setting to store such information.
- Client units
  - o Blinds/screens
  - o Hot water
  - Functioning Toilets
  - Closets/storage
  - $\circ \quad \text{Secure unit door} \quad$
  - Living space adequate for family size
  - Sleeping quarters Where clients sleep including the ability to accommodate transgender and gender nonconforming clients as needed as well as ADA accessibility.
  - Bathrooms- TCP staff will ensure that hot water and toilets are functioning as well as the ability to accommodate transgender and gender nonconforming clients as needed. TCP staff will also observe ADA accessibility.
- Posting of resources
- Communal areas

#### 6. REVIEW OF FINANCIAL RECORDS

A member of TCP's Finance Department may accompany a TCP staff person on a site visit. In such cases, documents that will be reviewed will be requested in advance, in writing to the provider's executive director and the finance director. Otherwise, a copy of the most recent financial audit should be provided to the visiting TCP Staff at the time of the site visit.

#### 7. REVIEW OF PROGRAM RECORDS

TCP staff will review program records during a site visit. Program files are reviewed for organization and content. A detailed list of the items that are to be reviewed is listed below:

#### **Client Records**

#### • Homeless Management Information System (HMIS) Data Entry

TCP staff will utilize the same criteria for completing a Desk Audit (outlined in section 2 of this document) as it relates to auditing client records in the HMIS when completing a site visit. This will be reviewed by the TCP staff before or after the site visit or complaint/grievance investigation.

- Shelter Plus Care Data Requirements As is the case with all programs funded by the US Department of Urban Development (HUD), Shelter Plus Care grantees, subrecipients, and service providers are required to maintain client level data in the HMIS. Client level data entered into the HMIS is used to complete all reporting projects as required by HUD, including: Annual Performance Reports (APR) to close out the Shelter Plus grants annually; Point in Time (PIT); and the Annual Homeless Assessment Report (AHAR) to Congress in addition to any reporting requirements mandated by The Department of Human Services (DHS). TCP, in its role of HMIS data entry for all individuals and families served in the Shelter Plus Care Program. Shelter Plus Care will provide TCP will all client level data necessary to complete DHS and HUD required reporting upon request.
- Domestic Violence (DV) Programs-DV programs are exempted from entering client level data into the HMIS. TCP will review case files and other program records to ensure there is appropriate documentation of services.
- **Client roster** This is a list of all the clients that are in the program. This list should also include vacancies.
- **Case Files** During a site visit, approximately 10% of the client roster will be selected at random and the case files of the select clients will be reviewed. If a site visit is conducted at a program site following receipt of a client complaint, approximately 50% of the client case files will be reviewed. The location and storage of the client files are viewed to ensure that they are being appropriately stored in a double locked setting. When completing a review of client files, TCP staff will check for the following:
  - Completed intake package-TCP will ensure that the client has at least one emergency contact listed
  - There are a set of updated program rules that have been signed by the client (this should include a signed copy of the Bullying Prevention Policy).
  - Escrow documents/transactions (if applicable)
  - Updated SPDAT Assessments (if applicable)
  - Documented reasonable accommodations (if applicable)
  - Unit/room inspection documents
  - Resources/referrals provided to the client
  - Rule Violation Notices, Disciplinary Notices, Behavior contracts, etc. (if applicable).
- Housing and Participant Assessment Reports (HPARs) –HPARs should be printed, signed by the client and kept in the file of the client or stored electronically. If stored electronically, the forms must be made available to TCP and or the DHS upon request.
- Maintenance Logs and Records / Pest Control Records This is a record of all maintenance requests and their completion. Providers should also maintain receipts from all outside contractors that perform repair or service such as pest control or other

facilities services. These are to be kept in a record book or electronically separate from the unit inspection forms.

- **Scope of Work** TCP will look for evidence that the provider is performing the tasks and offering the services outlined in the scope of work as stated in the contract.
- Participation in the Coordinated Assessment and Housing Placement (CAHP) System TCP will verify that providers that are required to participate in the CAHP system do so. This will be verified by reviewing intake documentation, HMIS records, and consistency reporting vacancies to TCP.

#### LOW BARRIER PROGRAMS:

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System via completion of the VI-SPDAT assessment for each client and enter VI-SPDAT information into the Homeless Management Information System (HMIS). The contractor shall designate a staff person to attend the community CAHP meetings held twice per month. The contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants and that program occupancy is reflected correctly in HMIS.

#### **PROGRAMS SERVING YOUTH:**

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor will complete the TAY VI-SPDAT for each client and enter the assessment tool information into the Homeless Management Information System (HMIS). The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP, and ensure program occupancy matches information reflected in the Homeless Management Information System (HMIS). The contractor shall accept direct referrals from the Runaway and Homeless Youth Hotline, TCP, and DHS.

# TEMPORARY SHELTER, TRANSITIONAL HOUSING, RAPID REHOUSING PROGRAMS (Singles):

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP, and ensure program occupancy matches information reflected in the Homeless Management Information System (HMIS). The Contractor will accept direct referrals from TCP and DHS and designate a staff person to attend the twice monthly community CAHP meetings.

## TEMPORARY SHELTER, TRANSITIONAL HOUSING, RAPID REHOUSING PROGRAMS (Families):

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP, and ensure program occupancy matches information reflected in the Homeless Management Information System (HMIS). The contractor will accept direct referrals from Virginia William Family Resource Center, TCP, and DHS.

#### **MEDICAL BEDS:**

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP, and ensure program occupancy matches information reflected in the Homeless Management Information System (HMIS). The Contractor will accept direct referrals from TCP and DHS and designate a staff person to attend the twice monthly community CAHP meetings.

#### PERMANENT SUPPORTIVE HOUSING:

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP, and ensure program occupancy matches information reflected in the Homeless Management Information System (HMIS). The contractor will accept direct referrals from TCP and DHS.

#### SHELTER PLUS CARE:

The Contractor shall participate in the District of Columbia Continuum of Care Coordinated Assessment and Housing Placement (CAHP) System to fill program vacancies for individuals and families. The Contractor shall ensure that vacancies are kept in a state of readiness at all times to accept new program participants. The Contractor shall report all program vacancies to the CAHP System representatives at TCP. The contractor will accept direct referrals from Virginia Williams Family Resource Center, TCP, and DHS.

#### 8. REVIEW OF ESCROW FILES

Escrow savings plans may not be mandated by a provider as a condition of services. Providers may offer clients the opportunity to voluntarily participate in escrow savings plans. Providers wishing to establish voluntary escrow savings plans must have language establishing the terms of escrow savings plans in the DHS-approved program rules signed by their clients. There should also be a separate document that allows for the client to sign for the participation or declining of participation in the escrow savings plan. The signed participation agreement should outline the deposit and withdrawal procedures as well as offer the client the opportunity to participate in the savings program in a financial institution of their choice. Escrow is not to be referred to as rent or as a fee of any kind and must be returned or issued to the client when requested and not to be used for any program costs or any other purpose.

Providers must have clients who wish to participate in voluntary escrow savings plans sign participation agreements and must maintain a file of the original agreements. The agreement must clearly state that participation in an escrow savings plan is voluntary and optional. Providers are to also maintain transaction records documenting when a deposit or withdrawal is made into the account of the client. Copies of receipts for deposits are to be maintained in both the client files and for records with accounting personnel.

Should a client be transferred or terminated from the program, a reconciliation of the client's escrow saving account is to be conducted and a withdrawal of all funds is to be conducted. The funds are to be mailed to the client by certified mail to the address provided upon exit. Should no address be provided, a record of attempts to reach the client is to be maintained with the check to be issued to the client.

These records are to be maintained by both the case manager in the client file and with the finance/accounting department within the organization.

#### 9. REVIEW OF PERSONNEL FILES

Personnel files are reviewed as a part of the site visit. This is to ensure that the agency is collecting and maintaining appropriate files for each employee charged to the contract. The list below outlines the items that are reviewed.

- Updated government issued photo ID (i.e. driver's license, state ID, passport, etc.)
- **Background checks** –. Background checks are required to be completed annually. The required background checks are the Metropolitan Police Department (MPD) and the Federal Bureau of Investigation (FBI) checks. Background clearances are to be reviewed before the date of hire to ensure that the staff member does not have a record that would prevent a person from being hired by the agency.
- Child and Family Services Agency (CFSA) Child Protection Register (applicable only to providers that serve youth)
- National Sex Offender (NSO) Registry
- **TB/PPD screenings** The Tuberculosis Screening (TB or PPD) is required to be completed annually by staff members as they have been tested and reviewed by a medical professional. The screening will be valid for one year after the date of screening completion and signature from a medical professional.
- **Toxicology screenings** These screenings are to ensure that staff members are adhering to the drug free workplace statement. These are to be done at hire and annually at random. The results of the screenings should be maintained in the staff files.
- **Verification of credentials** This should be a copy of the certificates, licensures, or other required credentials held by the staff members who are charged to the contract.
- **Orientation Verification** Records or verification of the completion of a new hire orientation.
- Job application and/or Resume A copy of the application for employment that was submitted by the staff member for the position that they are in that is being charged to the contract or a copy of the employee's resume.

- **Completed Reference Checks** These are to be completed prior to the hiring of a new staff member. Records of these should be maintained in the client file.
- **Performance Evaluations** Employee performance evaluations must be stored in the employee file. Performance evaluations must include the job description, a self-evaluation and the evaluation of the immediate supervisor completed with signatures from both the supervisor and staff member.
- **Training participation** –Training Transcripts outlining the trainings completed within the contract period are reviewed by TCP staff. TCP requires all individuals that are charged to the TCP-issued contract to complete all required trainings at the frequency noted in the contract. The complete list of required trainings can be found in the TCP issued contract.

#### **10. STAFF INTERVIEWS**

Site visits or investigations of complaints or grievances will include interviews with a provider's Executive Director and other staff charged to the contract. Staff members are interviewed to ensure that they are aware of the duties and responsibilities of their positions as described in the provider's position descriptions, provide feedback about daily assignments, express concerns or provide feedback of the reason of investigation. The interviews are also an opportunity for TCP to determine staff knowledge of relevant legislation and policy including but not limited to:

- HSRA,
- ADA and Reasonable Accommodations,
- Language Accessibility,
- TCP's Policy on Serving Transgender and Gender Nonconforming clients, and
- Knowledge of the provider's internal grievance policy.
- Providing services to Limited-English Proficient (LEP) and Non-English Proficient (NEP) clients.

Employees are randomly selected for interviews by the TCP staff conducting the interview. Employees selected for interview are chosen based on the names submitted on the submitted staffing list (TCP form 905). Employees interviewed have the option to remain anonymous except when they are named in a complaint or grievance that has been received by TCP.

#### **11. CLIENT INTERVIEWS**

During a site visit or investigation of a complaint or grievance, clients may be interviewed. The purpose of the interview will be to assess client satisfaction with the services provided and the program facility and to provide them with the opportunity to share any other concerns. Clients are randomly selected for interviews by the TCP staff conducting the visit using the client roster submitted as a deliverable. Clients may provide their name for identification or remain anonymous. A local phone number will be provided for clients to participate in the site visit interviews should they not be present at the time of the visit. The window to participate in the interview will be open for at least five (5) business days following the date of

the site visit. During client interviews, clients are questioned about topics including but not limited to the topics listed below:

- Knowledge on the process of filing a grievance
- Knowledge on the process of requesting a reasonable accommodation
- Frequency of engagement with the client's assigned case manager
- Satisfaction with assigned case manager
- Satisfaction with the program as a whole
- Suggestions for program improvement
- Satisfaction with meals provided at the site (if applicable)

#### **12. SITE VISIT DEBRIEF AND WRITTEN REPORT**

Site visits are followed by debriefing meetings with the executive director and/or program leadership. The debriefing meeting may happen on the same day as the site visit or on a day following the site visit at a mutually agreeable time. During the debriefing meeting, the observations and findings are discussed with the executive director and/or program leadership. A written report will be provided after the visit and returned to the provider. The written report will include findings as well as action items, a corrective action plan (if needed) and the dates in which items identified in the report are due to TCP for review.

#### **13. INVESTIGATING CLIENT COMPLAINTS OR GRIEVANCES**

TCP receives client complaints/grievances in several ways including but not limited to the following:

- Through TCP's Complaint Hotline
- Phone or email directly from the complainant
- Complaints forwarded directly from the Department of Human Services
- Complaints forwarded by advocacy groups
- Complaints forwarded from Mayor or Mayoral Designee

TCP will begin an investigation of a client complaint/grievance within 48 hours or two (2) business days of receipt of the complaint. TCP will contact the complainant by phone or email in effort to gain as much information regarding the concerns raised as possible. The information collected will inform the questions that will be asked of the provider in the next steps to be taken and to ensure prompt investigation of the concerns. The complainant will be advised of the next steps during the conversation. Shall the complainant have any supporting documents, videos or photos to support their complaint, TCP staff will request the complainant provide that information to the responding TCP representative via email. Following communication with the complainant, the provider/program identified in the complaint/grievance will be contacted in writing via email to begin the investigation process. The communication will advise the provider/program of the grievance and request a written statement in response to the allegations in the grievance. The executive director and/or program leadership will need to respond to the communication within two (2) business days in writing providing supporting documentation as necessary or requested. Upon receipt and review of the submitted response and

documentation, TCP will advise the provider whether or not the submission adequately addresses the allegations or if any further action is required. If the submission does not adequately address the allegations and/or if a formal investigation into the concerns is necessary, TCP will communicate next steps and the name of the TCP Staff person(s) who will be conducting the investigation. TCP shall utilize Corrective Action Plans and/or Deficiency Notice as needed while investigating client complaints/grievances. The outcome of the client complaint/grievance as well as next steps (if applicable) will be communicated to the complainant within 48 hours or two (2) business days from the conclusion of the investigation via email or phone.

Findings from a client complaint/investigation will be shared with the DHS in a shared folder via an electronic database. Client complaints/grievances that are investigated for HUD funded programs will be stored internally and shared with HUD upon request.

A site visit that is conducted to investigate a complaint or grievance may be announced or unannounced. This type of site visit may require additional interviews with clients and/or staff. A site visit may be warranted upon the review of provider submitted documents for the reasons listed below.

- Documents received do not adequately address the allegations of the complaint/grievance;
- Documents received do not sufficiently describe the remedy or solution to the complaint or grievance;
- The complaint or grievance received is one that is in the category of critical noncompliance; and/or
- TCP would like to do an on-site follow up to ensure that the statements provided by the organization have been implemented and are working

At the conclusion of a site visit, TCP staff will complete a report that will state the findings and identify a plan in which the provider is to adhere to, to ensuring that the concerns of the complainant are addressed and resolved as needed.

#### **14. Investigating Unusual/Critical Incidents**

#### **Unusual Incidents**

TCP requires its subcontractors to report unusual incidents to the DHS using its web-based reporting system, QuickBase. The web-based reporting system is operated and maintained by the DHS. Upon the completion of the report submission, an option to print a copy of the report is presented. Subcontractors of TCP are also required to submit a copy of the submitted Unusual Incident Report (UIR) to TCP through a separate web-based data management and reporting system, Smartsheets. Providers are to submit UIRs to both the DHS and TCP within 24 hours of the occurrence of the incident or within 24 hours of becoming aware of the incident.

Upon receipt of an UIR, each report will be assigned a priority level as outlined in the chart below included in Attachment D of this document.

TCP will initiate an investigation for incidents that are classified as Priority I within 24 hours of receiving the report. The responding TCP staff will contact the identified program in writing to confirm receipt of the UIR and to obtain needed information for the investigation. Depending on the incident, TCP staff may request that a provider complete its own internal investigation of the incident (in conjunction with TCP's investigation) and to provide TCP with its findings in the form of an "Internal Investigation Report". The purpose for collecting this report is for TCP to have a clear understanding of what transpired during the incident, what may have caused the incident, steps taken by the provider to address the incident, any follow up/safety plans that have been put in place by the provider as well as any disciplinary measures taken with client(s) involved if needed (i.e. termination, barring or a program transfer). During the investigation of an unusual incident, TCP collects all applicable evidence/documentation from the provider related to the incident. For instance, if a report of a client being stabbed at a program site is received, TCP staff will request information such as a police reports, witness statements, surveillance footage, incident reports from security vendors, completed termination notices, barring notices, etc. Depending on the incident, TCP may also investigate external vendors such as security vendors and janitorial staff if needed.

TCP may complete investigations for incidents that are classified as Priority I with or without visiting the program site. TCP staff will complete an investigation of an incident at a program site if an investigation warrants TCP to complete interviews of clients, program staff, security or janitorial personnel.

Incidents that are classified as Priority II may be investigated by TCP depending on the incident; however, incidents that are classified as Priority II are treated as "follow ups" instead of actual investigations. Follow ups with providers are often done via email. During an UIR follow up, TCP staff will present follow up questions to the provider based off of the incident report received to ensure that all needed follow up actions have taken place. For instance, if a report of a client entering a site-based program with lice is received, TCP staff will follow up with the program leadership via email to ensure that the client obtained the needed medical attention and to ensure that a request for deep cleaning was submitted. Incidents that are classified as Priority III may or may not warrant follow up from TCP.

Findings from UIR investigations that is classified as Priority I will be compiled and stored internally along with all applicable documents. TCP's UIR investigation findings are also shared with the DHS in a shared folder via an electronic database, Dropbox. Completed UIR investigations are stored by the UIR identification/allegation number (also known as the AC number) as well as the date in which the incident occurred. UIR investigations are saved by fiscal year, contract type and provider and program name. As it relates to UIR follow ups for incidents that are classified as priority II or III, TCP saves and stores the email thread with the provider that includes the questions presented by TCP as well as the responses provided by the provider. Any applicable documents related to the incident will also be stored along with the email thread. UIR follow ups are saved are stored internally using the same format as UIR investigations above and are also shared with the DHS.

#### **Critical Incidents**

Critical Incidents, differing from unusual incidents, are incidents that have occurred within a program funded by HUD. TCP utilizes the same priority criteria as UIRs to determine the level of investigation or follow up needed. Programs that are funded through HUD are required to submit Critical Incident

Reports (CIRs) to TCP through a separate web-based tracker. Investigations and follow ups to CIRs are stored internally by provider, program and date of the incident. CIR investigations and follow ups are shared with HUD upon request.

#### **Emergency Incident Report Hotline**

As it is understood that some incidents require immediate attention from TCP, TCP has implemented an emergency incident report hotline that providers are required to utilize in effort to report emergency incidents to TCP immediately. The emergency incident report hotline allows providers to call and report an emergency incident using an external messaging system that is accessed by TCP. The submission of a UIR or CIR to the required trackers is still required in addition to reporting the emergency incident to the emergency incident report hotline. Emergency incidents should be reported to TCP via the emergency incident report hotline within two (2) hours from the occurrence of the incident.

Emergency incidents include but are not limited to the following:

- A client is found to be in possession of a weapon while at a program facility
- A client or staff member is assaulted with the use of a weapon (i.e. a staff member or client is wounded by stabbing or gunshot wound)
- The occurrence of a physical altercation between a client and an employee and/or security personnel
- A client obtains life threatening injuries in result of a physical altercation that requires medical attention
- Power outage at a program facility that lasts longer than one hour.

After the emergency incident report hotline, staff will be prompted to provide the following information to the representative via the external messaging system:

- Name of the employee submitting the report
- Phone number
- Email Address
- Employee title
- Provider
- Program Name
- Brief Description of the incident

After submitting the report via the emergency incident report hotline, the information will be transcribed in an email and provided directly to TCP staff for awareness. TCP staff will reach out to program staff following receipt of an emergency incident within two (2) hours of receipt.

#### **Client Fatalities**

TCP requires its subcontractors to report client fatalities within 24 hours of the occurrence of the fatality or within 24 hours of becoming aware of the fatality. Providers are required to complete and submit to TCP a Fatality Report whenever there is a client fatality. (Please reference Attachment E of this document that includes a copy of TCP's Fatality Report). Fatality Reports are required to be submitted to TCP though a separate web-based tracker. TCP will complete an investigation or follow up with a provider regarding a client fatality for the following reasons:

- A client was deceased at a facility for an extended period of time without program staff being aware
- The fatality was not reported to TCP within 24 hours of the fatality or within 24 hours of becoming aware of the fatality
- The deceased client has minor children that can potentially be at risk of homelessness

#### 15. REVIEW OF CONTRACT DELIVERABLES AND OTHER REQUESTED DOCUMENTS

TCP collects from all subcontractors deliverables to support the issued contract. Documents required for submission are categorized as master deliverables or tier one deliverables. Master deliverables are the documents that validate business operation such as a business license, certificate of occupancy and verification of insurance. Tier one deliverables are all other documents that outline how the provider will carry out the requirements of the contract. Examples of this include the staffing list, job descriptions, budget and budget narrative supporting the contract. The submission of contract deliverables may differ depending on the contract type (HUD, security, janitorial..etc.). A complete list of deliverables that are required for each contract type is outlined in each TCP- issued contract.

TCP requires its providers to sign the TCP-issued contract within five (5) business days from the date of issuance in effort to have a fully executed contract. Shall a provider desire to negotiate the terms of the contract, TCP requires that the provider submit a written request prior to the 5<sup>th</sup> business day (expected deadline) in which the contract is required to be executed. A statement of acknowledgement of the request for negotiation will be provided by TCP within 48 hours or two (2) business days of receipt. The negotiation period shall not exceed twenty (20) business days. If a contract is being negotiated, the contract will need to be signed by the provider no later than the 21<sup>st</sup> business day. If there is a negotiation in place, TCP will issue a letter agreement to the provider that will detail the parameters of the service and billing. TCP will not allow providers to perform services under a contract without a signed contract or signed letter agreement on file. A complete package of contract deliverables (master and tier one deliverables) are due to TCP within (7) business days of contract execution. The table below outlines the master and tier one deliverables that are required.

MASTER DELIVERABLES	TCP Form #	DESCRIPTION			
Agency Organization Chart		Consists of a flow chart of all the positions within the agency outlining staff names, positions, and supervisory tracks.			
Employee Handbook/Policy Procedures		Document or manual that outlines the policies and procedures of the agency in which all staff, interns and/or volunteers are to follow. The employee handbook must also include the Youth Bullying Prevention Plan and its acknowledgement to be signed by all staff.			

### TCP – CONTRACT DELIVERABLES

Code of Conduct	Document that outlines the agency's rules, responsibilities, proper practices and expectations for its employees. This document can be submitted as a stand-alone document or can be included in the agency's Employee Handbook. If its included in the agency's Employee Handbook, please submit a Deliverable Exemption Form in lieu of this document indicating that the Code of Conduct is included in the Employee Handbook as well as the page in which this document can be found.
Non-Fraternization Policy	Should outline the agency's policy regarding fraternization to include the prohibiting of fraternizing with clients/residents. The policy should clearly include the disciplinary system/follow up steps that will be taken with any employee that violates this policy. This document can be submitted as a stand-alone document or can be included in the agency's Employee Handbook. If it is included in the agency's Employee Handbook, please submit a Deliverable Exemption Form in lieu of this document indicating that Non Fraternization Policy is included in the Employee Handbook as well as the page in which this document can be found.
Record Keeping System	A document that outlines the agency's protocol for record retention, to include client records and financial documents. This policy must be consistent with TCP's requirement of retaining financial records for a minimum of 3 years.
Organizational Budget	Organizational budget consists of the budget for the whole agency and should not be mistaken for the program budget which is to be submitted as a tier one deliverable.
Property Agreements	Property Agreements include any documents including but not limited to: leases, agreements for grounds maintenance or property management organizations.
Elevator Operation Certificate	This document certifies that the elevators used in programs have been inspected and have passed inspection for use.
Insurance Certificate	This certificate shows the amount of insurance that the provider has and must be in accordance with the minimum amount allowable as defined in the contract. An insurance certificate should list The Community Partnership for the Prevention of Homelessness (TCP) as the additional insured and must be current to the date of submission and issuance of the contract. All insurance or relevant forms submitted to fulfill this deliverable requirement must be current and cover the entire length of the contract. Therefore, contractors are required to share any forms that are updated throughout the duration of the contract. The provider must notify TCP within 30 days of any intent to cancel insurance.

Signed Certification of Fiscal Controls	TCP Form 298	This document certifies that agencies understand and abide by fiscal controls and practices including: disbursement checks, corresponding invoices, and additional documentation, petty cash and bank reconciliations.		
Drug-Free Work Place Policy		This document addresses the agencies agreement to remaining free of illegal drugs in the workplace.		
Procurement Policy (applicable to For-profit providers)		This document should include purchase products from the US and the purchase of equipment should have pre- approval from TCP.		
Verification of Formerly Homeless Board or Advisory Group Member	This letter should be on agency letterhead with the name, signature and contact information for the person that serves on the board of directors or serves as a member of an advisory group who is formerly homeless.			
Board of Director President and Executive Director Signature Verification Sheet		This form should be on agency letterhead with the names and contact information for all persons serving on the agencies Executive Board, including and the Executive Director. Signatures are required for the Executive Director, President of the Board and all persons with check signing authority.		
Signed Audit Request Form	TCP Form 297	This form verifies that an agency has requested to be audited for the fiscal year. All providers no matter the amount of the contract should have this form signed.		
Completed Previous Fiscal Year Audit		This document is the summary of audit and findings of a financial audit conducted by a third-party auditor to review the financial management of the previous year.		
Completed Previous Fiscal Year Audit or Hiring Manual (applicable to For-Profit providers)		This document is the summary of audit and findings of a financial audit conducted by a third-party auditor to review the financial management of the previous year. Hiring Manual should include employee personnel and nondiscrimination policies, Living wage compliance; No Fraternization Policy, call-out/leave policy, policy for instances where staff are no shows for their scheduled shift, uniform/equipment compliance policy		
Blank Assessment/Screening Forms		These are all of the forms that an agency will use to provide services to the clients. This includes, but is not limited to: intake forms, psychosocial assessment forms, drug and alcohol screening forms or any other documents that the agency will use to assess the clients served. Please note: Blank TCP Housing and Participant Assessment Reports (HPAR) and/or blank Client Satisfaction Survey documents submitted are not acceptable.		

First Source Agreement (Confirmation of submitting agreement to the Department of Employment Services (DOES).	TCP requires each subcontractor to provide evidence that it has submitted its First Source Agreement to the Department of Employment Services (DOES) via the following email address: firstsource@dc.gov You may upload a PDF of the email sent to the aforementioned email address containing your completed First Source Agreement. After submission of your First Source Agreement, you should receive an executed agreement from DOES within one week. Please retain a copy of the executed agreement as this document will be requested during the Contract Closeout Period and when TCP completes a monitoring activity.
Certificate of Good Standing	Please Note: This is not required for HUD Contracts. A document issued by the government of the District of Columbia
	that states that your agency has met all statutory requirements and is authorized to do business.
Lead Based Paint Disclosure Form	This document certifies that the facility has been tested and is free and clear of lead-based paint. If there has been a history of lead- based paint, this must be stated in the disclosure form.
Business License	This document is issued by the government of the District of Columbia and verifies that the organization has meet all requirements to conduct and operate business.
Certificate of Occupancy	A document issued by the government of the District of Columbia that certifies that the building complies with all applicable building codes and local laws that indicating it to be in a condition suitable for occupancy.
Emergency Preparedness Plan/Continuation of Operations Plan (COOP)	A copy of the Emergency Preparedness Plan (EPP) is required to be completed by the provider.
	An <b>emergency</b> management <b>plan</b> is a course of action developed to mitigate the damage of potential events that could endanger an organization's ability to function. Such a <b>plan</b> should include measures that provide for the safety of clients, personnel and, if possible, property and facilities. *TCP requires subcontractors that are funded through the Department of Human Services to complete and submit a COOP.
ACH Enrollment-Change form	This form is used for enrolling or making changes for direct deposit. Please note that this is required when there is new enrollment or a change to the account information. If there is no changes from the previous year, please submit a statement on agency letterhead signed by the executive director stating that there are no changes to the current ACH Enrollment Information.
Language Access Act Compliance: Bilingual Staff Log	The Language Access Act of 2004 requires District agencies to make interpretation services available to all Limited English Proficient (LEP) and Non-English Proficient (NEP) customers seeking services

Finance Deliverables	TIER O	and the collection of data relative to the services provided. To ensure compliance with the Act, The Community Partnership for the Prevention of Homelessness (TCP) requires its subcontractors to complete a Bilingual Staff Log that indicates the names of the employees at your agency that are bilingual as well as information regarding languages spoken and credentials. This report must be completed annually and submitted along with your agency's Master Deliverables Package for each contract.
Signed Contract		The signed original copy of the contract issued is to be submitted
Signed Contract		as a Tier One Deliverable.
Initial Budget	*Used only for programs funded with DHS dollars*	This is the budget of the contracted amount and is not to be mistaken for the organizational budget.
	TCP Form 327	
Initial Budget-SHP	*Used only for programs funded with HUD dollars	This is the budget of the contracted amount and is not to be mistaken for the organizational budget
	TCP Form 315	
Budget Narrative	TCP Form 328	The budget narrative is a description of how the funds budgeted will be used and must be signed and dated by the preparer and the agency Executive Director.
Staffing List	TCP Form 905	The staffing list includes all staff whose full or partial salaries are charged to the contract. The list should additionally be broken down according to operating and administrative staff. This form must be updated and submitted to TCP anytime there are staffing changes and vacant positions.
Payroll Calendar/Schedule		Calendar in which the provider will pay employees.
All Other Tier One Deliverables		
Program Rules		Program rules are those client rules that the clients must adhere to while in the program and must outline client and provider rights and responsibilities. They must be approved by the District of Columbia Department of Human Services (DHS) annually.
Scope of Work (TCP provided document)		The scope of work (template provided by TCP) is a detailed narrative of the nature of the work that will be completed under the contract, as well as how the program services under the contract are intended to accomplish the goals and mission of the agency. The Scope of Work should also include a staffing plan that

	outlines the program's plan for maintaining the required staff needed to perform the services under the contract as well as the plan to fill vacant positions.NOTE: The brief scope of work referenced on the first page of the contract is not sufficient to fulfill this deliverable and must be expanded upon to include menu services and service delivery model that the provider intends to follow.
Program Job Descriptions	Job descriptions detail the roles and responsibilities of the persons who are working within the program and are charged to the contract. These job descriptions must match the titles that are noted on the TCP Form 905.
Employee Background Clearances	<ul> <li>The following documents must be submitted to TCP for each employee that is charged to the TCP-issued contract (all staff included on the TCP 905 Form-Staffing List (no exceptions).</li> <li>Please note that the below information must be submitted in the form of a zip file for each employee: <ul> <li>An updated government issued photo ID (i.e. drivers license, state ID or passport)</li> <li>Federal Bureau of Investigations (FBI) fingerprint background check</li> <li>Metropolitan Police Department (MPD) background check</li> <li>Child and Family Services Agency (CFSA) Child Protection Register (applicable to providers that serve youth</li> <li>National Sex Offender (NS) Registry</li> <li>Toxicology Screenings</li> <li>Tuberculosis screenings</li> </ul> </li> <li>Please note that FBI and MPD background screenings are required to be completed at the time of hire and annually for all staff, either full or part time, that are charged to the contract with TCP (no exceptions).</li> </ul> Zip files containing the above documents for each employee must be submitted to TCP via an identified (password protected) electronic database that is itiled with the employee's first initial, last name, and date of hire in the following format (12.19.2021). Example: "JJohnson12.19.2021".
Fire Safety Inspection Report	*Applicable to site-based programs only. A copy of the most recent fire inspection report conducted by DC Fire and Emergency Medical Service Department (DCFEMS).

Building Evacuation Plan		*Applicable to site-based programs only.
		An illustrated diagram of the facility's evacuation route as well as a brief narrative that explains the building's plan for evacuation in the case of an emergency. The diagram should be clearly titled and clearly identifies all exits/emergency exits within the facility.
Staffing List of Safety Sensitive Positions	*Applicable for youth and family providers ONLY. TCP Form 906	Safety sensitive positions include any staff person whose work involves regularly working with children aged 17 or younger. Examples might include but are not limited to: case managers, outreach workers, child care personnel or program managers. Please note: TCP may request information such as dates of birth or other confidential information if needed.
Evidence of Coordination and Collaborative Agreements		Providers are required to work with other organizations to ensure that clients are receiving adequate services. The following are considered appropriate documentation: Memorandum of Understanding (MOU) with a partnering agency, Statement of Partnership, and other forms of verification of partnership. If a letter of intent is submitted, the coordination of partnership must be for the period in which the contract has been issued.
Program Staff Information Form	TCP Form 904	This form requests and verifies that all leadership, finance and programmatic staff information is up to date at the time the contract is issued. This includes all contact information: email, office phone, and office address.
Confidential File Management Procedures		This document outlines the procedures set in place by the provider to ensure client and file confidentiality.
Updated Client Roster	*Applicable to scattered site programs only	This document outlines the names of all program participants as well as their HMIS ID numbers (if applicable).
Housing Quality Standards (HQS) Inspection Reports	*Applicable to scattered site programs only	Updated HQS Inspection reports shall be submitted for the units of all clients that are included on the Client Roster. *Please note that HQS inspections shall be completed at the time in which a client moves into a unit and annually thereafter.
Certified Food Handlers Form	*Applicable to programs that receive and distribute meals to program participants	This form should outline the names of all employees that are certified food handlers within your program. Please note that a copy of the Certified Food Handler certificate must be provided for each employee that is included on your program's Staffing List (905 Form).
Additional deliverables req	uired of Specialty Pro	viders (Security, Janitorial, Meal Providers and contractors)

Food Safety Training Certificates	*Applicable to meal providers only	Serve Safe training certificates that are
Food Safety framing Certificates	Applicable to meal providers only	valid throughout the contract period should submitted for each staff person charged to the contract
Post Orders for Each Facility (Signed by each officer at each post at all sites)	*Applicable to security providers only	Each security guard post will have a Security Guard Post Assignment Record (Post Orders). Any changes to Post Orders or changes to patrol protocol must be approved by TCP prior to implementation. At a minimum, Post Orders must be submitted to TCP for approval annually.
		The Contractor shall ensure that security guard post orders include the number of guards assigned to each facility and assigned to each floor (if applicable) as well as guidelines, duties and responsibilities related to:
		a) Access control
		b) Package screening
		c) Personnel screening
		d) Traffic control
		e) Visitor processing
		<ul><li>f) Communications and dispatching</li></ul>
		g) Patrol operations
		<ul> <li>h) Emergency and event response</li> </ul>
		The post orders must be signed by the officers who will be at the identified site and submitted as a supplement to this submission.
Special Police Officer Licenses	*Applicable to security providers only	Copies of current Special Police Officer (SPO) licenses for all security personnel charged to the contract.
Fitness for Duty Description	*Applicable to security providers only	The Fitness for Duty Description outlines the educational, licensing, and physical

		requirements the Contractor requires of security personnel charged to this Contract
Blank Incident Report Form	*Applicable to security providers only	This form details what information (time, date place, etc.) security personnel will report to program staff when an unusual incident occurs. The information security staff reports will be used by program staff to complete the required Unusual Incident Report for DHS and TCP
Detailed Training Plan	*Applicable to security providers only	This document is a written narrative to be implemented internally in effort to obtain and maintain compliance with the training requirements that are outlined in Contract (Include contract number) for the contract period of (include contract period). The submitted plan should clearly identify which staff members will be responsible for training compliance oversight, the identified staff contact information, as well as the steps taken and how often the identified steps will be taken to maintain compliance

TCP may request documents that are not listed in the above chart in the event that they are needed to investigate or if it will resolve a matter or question of record found in the deliverables or on site. The deadline for submission of these documents will be provided to the executive leadership or designee of the executive director in writing.

#### **Deliverable Exemptions**

TCP requires providers to utilize a Deliverable Exemption Form (Please reference Attachment F of this document) in the event that there are deliverables that may not apply to a particular contract. For instance, a scattered site program is exempted from the submission of the Certified Food Handlers Form as such program type does not receive and distribute meals to program participants. On the Deliverable Exemption Form, providers are required to indicate whether or not the noted exemption is permanent or temporary. Examples of a temporary exemption would be if a provider is waiting to receive a copy of their Previous Fiscal Year Financial Audit Report from an external agency. In this instance, the provider would be required to complete the Deliverable Exemption Form indicating a "temporary exemption" as well as the reasoning for the temporary exemption. The provider will also be required to indicate the date in June 2023

which they expect to submit the noted deliverable to TCP.

#### **Deliverable Storage**

All deliverables packages are stored electronically in TCP's internal database for each contract. TCP utilizes a "four folder break-down" for each contract to store deliverables. Contracts are stored by fiscal year and contract type. Each contract has its own folder titled by the contract number and has the below (4) subfolders:

- Signed Contract/Deliverable Submission/Payment Clearance Receipt Form-This folder includes a copy of the signed contract as well as the Deliverable Submission/Clearance Receipt Form.
- Master Deliverables- This folder includes copies of all of the contract's master deliverables
- **Tier One Deliverables** This folder includes copies of all of the contract's tier one deliverables
- **Finance Deliverables-** This folder includes copies of all of the contract's finance deliverables such as the Initial Budget, Budget Narrative and Staffing List.

Deliverables for programs that are funded through the DHS are also stored via a shared electronic file sharing system with DHS. Deliverables for programs that are funded through HUD are stored via TCP's internal database and are shared with HUD upon request via electronic file sharing system.

#### TCP Deliverable Submission/Payment Clearance Receipt Form

The Deliverable Submission/Payment Clearance Receipt Form (please reference Attachment G of this document) is an acknowledgment document that TCP issues to its providers after a contract's full deliverable package is reviewed by TCP staff. This form alerts providers that their deliverable package has been accepted by TCP and that the contract of interest is cleared for payment or alerts providers that there are one or more deliverables that have not been accepted by TCP that requires resubmission in order for the contract of interest to be cleared for payment. If deliverable resubmission is required, the document will also outline the deliverables that require resubmission and will redirect the provider to the electronic database used for deliverable submission to review in detail the errors with the deliverable(s) and will allow the provider to re-submit the deliverable(s).

#### **Contract Closeout Reviews**

At the end of each contract period, TCP completes a Contract Closeout Review on its contracts to ensure that TCP has updated deliverables on file to successfully close out the current contract and to prepare for the issuance of contracts for the new fiscal year. During the Contract Closeout Review, TCP completes a secondary review of deliverables that are on file for each contract. During this time, documents that may have expired during the contract period such as Business Licenses, Insurance Certificates, Personnel Screenings and Fire Safety Inspections may require resubmission. During this time, TCP may also request deliverables that were noted as temporarily exempted at the beginning of the contract period. A Contract Closeout Review Checklist is completed by TCP staff and sent to the provider. The Contract Closeout Review Checklist indicates the deliverables that are currently on file that are cleared and accepted by TCP and also indicates the deliverables that are currently on file that require resubmission.

checklist is sent to the provider via email by TCP. Providers are given a due date to submit all noted resubmissions to TCP. Failure to submit the requested documents will result in the issuance of a Deficiency Notice and/or ineligibly for the new fiscal year contract.

#### **16. DEFICIENCY NOTICES**

TCP will issue the provider a Deficiency Notice in the event that one or more of the following circumstances have occurred:

- Failed to submit contract deliverables
- Failed to submit a monthly fire drill (site-based programs only)
- Failed to submit client biannual client satisfaction survey
- Failed to complete Housing and Participant Assessment Reports
- Failed to report required information
- Failed to comply with a corrective action plan issued by TCP, DHS and/or HUD
- Failed to report an unusual incident/critical incident to TCP within 24 hours from the occurrence of the incident or within 24 hours of becoming aware of the incident
- Failed to report a client fatality within 24 hours of the occurrence of the incident or within 24 hours of becoming aware of the incident
- Other circumstances as necessary

The purpose of the Deficiency Notice is to alert providers that they are out of compliance with the contract and provide an opportunity to correct the deficiency. If the deficiency is not corrected, payment will be withheld on all contracts with TCP until addressed to the satisfaction of TCP. **(Please reference Attachment H).** 

#### **17. REPORTS AND INFORMATION SHARING**

To share reports with the DHS, TCP maintains an electronic filing system that allows for 24-hour access to all reports completed for investigations or regular monitoring activities. All reports will be shared through email and in the electronic filing system in accordance to the time frames for reporting as stated in this plan.



## THE COMMUNITY PARTNERSHIP FOR THE PREVENTION OF HOMELESSNESS

## Virtual Audit Checklist

Contractor Name:
Contract Period:
Contract Number:
Program Name(s):
Program Type:
Capacity:
Target Population:
Contact Person (s)/Title:
Email Address:
Program Address:

*Overview*: Each program funded by The Community Partnership for the Prevention of Homelessness (TCP) is subject to an audit at minimum once per year in effort to ensure compliance with the requirements outlined in your TCP issued contract. As a part of your audit, this form is required to be completed in its entirety and submitted via email to the TCP representative identified in the email in which this form was issued. Please answer the below questions regarding your program. **\*Please note that some of the questions below requires you to submit a picture to support your answer. The questions that require the submission of a picture includes a red asterisk at the beginning of the question. Pictures can be provided via email along with the submission of this form.** 

Phone:

- 1. Does your program site have properly functioning fire extinguishers? 

  Yes No
- 2. Number of fire extinguishers included in the facility: (If your facility has more than one floor, please indicate how many fire extinguishers are included on each floor).
- Please include the dates in which each fire extinguisher was last serviced/inspected by DC F&EMS:
- 4. Please include the most recent date in which your program site had a fire safety inspection completed by DC F&EMS?
- 5. \*(Photo Required) Does your program site have emergency evacuation routes posted and visible?

🗆 Yes 🛛 No

- 6. \*(Photo Required) Does your program site have exit signs posted at all exits?
   □Yes □ No
- 7. \*(Photo Required) Does your program site have the "Interpreter Services Available", Desktop Displays posted and visible in intake and/or communal areas of the facility?

□Yes □No

 \*(Photo Required) Does your program site have the "Interpreter Services Available", Desktop Displays posted and visible at the front desk of the facility?

□Yes □No

9. \*(Photo Required) Does your program site have the "Confidentiality Poster", posted and visible in the intake and/or communal areas of the facility?

□Yes □No

10. \*(Photo Required) Does your program site have the "ADA Poster", posted and visible in the intake and/or communal areas of the facility in both English and Spanish?

□Yes □No

11. \*(Photo Required) Does your program site have the "How to File a Complaint" poster displayed in the intake and and/or communal areas of the facility?

□Yes □No

12. \*(Photo Required) Is the site in which services are rendered handicap accessible?□Yes □ No

13. \*(Photo Required) Does your program site have the Living Wage Acknowledgement poster displayed?

□Yes □No

- 14. \*(Photo Required) Does your program site have updated Program Rules displayed? □ Yes □ No
- 15. \*(Photo Required) Are client files stored in a doubled locked setting?

If unable to provide a photo to indicate that client files are stored in a doubled locked setting, please explain in detail how your program site meets the above requirement:

16. How does your program offer clients a means to provide feedback about program services? (i.e. suggestion boxes, weekly house meetings, etc.).

17. \*(Photo Required) Please indicate below how your program is adhering to COVID-19 guidelines regarding social distancing as well mask mandates. Please provide pictures to support your explanation. (i.e. pictures of 6ft apart indicators on the floor, posted signs regarding mask requirements, etc.).

Name and title of Employee completing form

Signature

Date

#### Attachment B: TCP Site Visit Announcement Notice



The Community Partnership for the Prevention of Homelessness Program Site Visit Announcement Notice

#### Greetings,

The Community Partnership for the Prevention of Homelessness (TCP) will be conducting a site visit of the [enter provider and program name] on [enter the date of the scheduled visit] located at [enter the address of the program site] at [enter the time of the scheduled visit]. The site visit is a regular visit that is conducted to observe the daily operations of your program, observe and ensure adherence to relevant protocols/policies, and to obtain client and employee feedback. Please review this notice in its entirety as it includes information that will be needed before, during and after the completion your site visit. After reviewing this notice, please sign and date the notice and return the signed notice to the noted TCP representative by 5pm on the date in which the notice was provided.

#### Information/Documents needed before your visit:

- Points of Contacts: TCP will need the names, titles and contact information for the program staff that will be facilitating the visit. Please note that executive or senior leadership does not need to be present for this visit. If senior leadership will not be present, please identify the staff person(s) that will be the point person for the visit while TCP is on site as well as their telephone number and email address.
- Updated Client Roster: TCP will need an updated client roster that includes the names of all participants in the program.

## \*The above information will need to be provided via email to the TCP representative noted at the bottom of this notice by 5pm on the date in which the notice was provided.

#### During the Site Visit TCP Staff will:

- Tour the facility: The tour of the facility should include all levels of the facility to include restrooms, dinning areas, recreational areas, sleeping quarters, laundry rooms..etc. If participants in your program live in individual units or rooms, please be sure to gain permission from about two program participants for TCP staff to tour their unit/room on the date of the scheduled visit.
- Training Transcripts: Review the training transcripts (for the current contract period) of 10% of the employees that are charged to your contract. \*These employees will be selected at random.
- Personnel Files: Review the personnel files of 10% of the employees that are charged to your contract. \*These employees will be selected at random. If personnel files are not stored on site, please provide a date and time via email that TCP staff will be able to visit your agency's administrative office to complete a review of personnel files for the program of interest.
- Client Files: Review the files of 10% of the clients included on the program's client roster.
- Fire Safety: TCP staff will review all fire safety related documents to include fire drill books and logs, fire extinguisher servicing, Fire Safety Inspection Reports...etc.
- Facility Related Information: Presence of exit signs at each exit, elevator inspection certificates (if applicable), emergency evacuation routes, frequency of unit, room, or dorm inspections, required postings, COVID-19 protocols...etc.
- o Storing of Client Files: TCP staff will review the storing system of client files at the program site
- Service Delivery Protocols: TCP staff will review services provided to clients at the program site, protocols for clients to provide program feedback..etc.
- o Escrow Savings Protocols (if applicable): TCP staff will review your program's Escrow Savings Protocol (if applicable).
- Employee Interviews: TCP staff will interview 10% of the employees included on your program's Staffing List. \*Please be sure that employees are available for an interview on the date of the scheduled site visit.
- Client Interviews: TCP staff will interview 10% of the clients included on the program's client roster. Please ensure that clients are available for an interview on the date of your scheduled visit.

#### Documents needed after your visit:

The below documents will need to be provided to TCP within <u>two business days</u> from the date of your completed site visit:

- First Source Compliance: If your program is required to comply with First Source Law, a copy of your executed First Source Agreement or the email confirmation that your agreement has been sent via email to the Department of Employment Services (DOES) \*Please note that TCP will only accept email confirmation if an executed agreement has not yet been received from DOES.
- A copy of the Detailed Cumulative Statistics Report from the FORRS system to confirm monthly reporting for the past three months for the identified contract.
- Maintenance and Pest Control Records if these documents were not provided at the time of the site visit.
- \*Please note that TCP staff may request to view additional information/documents during or after your site visit that is not included on this notice.

#### **TCP Staff Conducting Visit**

June 2023

The visit to your program site will be conducted by the following TCP staff:

- •
- •
- •
- .

All documents relative to the site visit/audit or any questions regarding the scheduled site visit can be sent via email to the following TCP staff:

\*If there are any COVID-19 protocols that you would like TCP staff to follow while visiting you site, please be sure to let us know via email prior to your scheduled site visit.

#### Provider Acknowledgement of Visit (To be completed by Provider)

By signing this notice, you acknowledge that TCP will be completing a site visit at the [enter provider and program name] located at [enter program site address] on [enter date of the scheduled site visit] at [enter time of the scheduled site visit]. By signing this notice, I also acknowledge that if the program manager or senior leadership will not be present during the visit, another staff member has been appointed to facilitate the visit and the name(s) and contact information will be provided via email to TCP for the appointed person(s).

\*Please note that if TCP does not receive this signed notice or an email regarding the notice by 5pm on the date in which the notice was issued, TCP will assume acknowledgement of the site visit and will report to your site on the scheduled date and time.

Program Manager Name

Program Manager Signature

Date

## **PRIORITY** |

- Health and Safety
   Complaints
- Sexual Harassment or other forms of harassment investigations
- Unusual Incident Investigations\*\*
  - i.e. domestic violence incidents, rodent infestation reports, etc.
- Investigation of any reports of client right violations
- Direct requests from the Department of Human Services (DHS) to monitor or conduct an investigation on behalf of or in conjunction with DHS staff

## **PRIORITY II**

- Client Service Delivery complaints
- Facility complaints
- Subcontractors
   personnel complaints
- Unusual Incidents Investigations\*\*
  - i.e. quality of food

## **PRIORITY III**

- Review of subcontracted programs
- Follow up site visits on programs previously visited

#### Attachment D- Unusual Incident Priority Levels

## **PRIORITY** |

- Health and Safety Reports (i.e. building wide infestation, Security breeches)
- Power outages , heat, air conditioning and water outages (including reports of no hot water at a facility)
- Sexual Harassment or other forms of harassment
- Client dwelling units with severe maintenance concerns and/or units deemed inhabitable (i.e mold, lead based paint, fire..etc)
- Domestic violence incidents
- Child abuse
- Client right violations
- Clients reported missing for more than 72 hours
- Direct requests from the Department of Human Services (DHS) to monitor or conduct an investigation of a reported incident on behalf of or in conjunction with DHS staff
- Fatalities
- Posession of a weapon at a program site
- Client assaulted by security, janitorial staff or other personell
- Severe COVID-19 outbreak

## **PRIORITY II**

- Client Service Delivery complaints
- Facility complaints/issues (i.e rodent or insect infestation)
- Clients reported missing for more than 48 hours
- Meal Delivery Issues
- Subcontractors personnel complaints

## **PRIORITY III**

- Request for medical attention
- Responses for emergency services (i.e. client altercations, client calls for emergency services)
- Reports that include follow up actions taken and/or safty plans
- Curfew violations
- Truancy
- Stolen public assistance cards (i.e stolen TANF or SNAP cards)



### The Community Partnership for the Prevention of Homelessness Fatality Report Form

The Community Partnership for the Prevention of Homelessness (TCP) requires all of it subcontractors to report a fatality within the program to TCP within 24 hours from the occurrence of the Fatality or within 24 hours of becoming aware of the Fatality. Please complete this form in its entirety and submit a PDF Copy of the report to the link noted below. Please ensure that the below report is completed in its entirety and includes all of the required signatures before submission. If you have any questions regarding the completion or submission of this report, please contact Ashley Burrell, Senior Compliance Specialist at <u>aburrell@community-partnership.org</u>.

#### https://app.smartsheet.com/b/form/1777fd74f18a4665b8bd90e9556932b6

				Provide	er Information		
Name:					Date of Report:		
Title:					Phone Number:		
Email:					Program Name:		_
				Client	Information		
Name of Deceased:					Age of Deceased:		
Date & Time of Death:					Cause of Death:		
Location of Death:					Source of Report		
Hypothermia Relat	ted: 🗆 Yes	□ No		Medical Exa If checked	miner Notified I, when?		
				Provide	r Observations		
Please provide the	date in which the	e client of inter	est was la	st seen by pro	ogram staff prior to the	client's death:	

How did the client appear on this day? Were there any visible physical concerns? Did the client appear to be in distress?

**Incident Description** 

Use the space below to provide a descriptive narrative regarding the incident. If additional space is needed, please use an additional sheet of paper and attach to this report.

#### Provider Follow-Up

Has program staff contacted the client's noted emergency contacts to inform them about the client's death? Yes No

Has the client's HMIS profile (including case notes) been updated to reflect the client's death? Yes No

Has the client been exited from the program in HMIS? Yes No

(Please note that following confirmation of a client's death, the provider must exit the client out of the program in HMIS. This can be done by accessing the client's HMIS profile, clicking the Entry/Exit Tab, select the pencil next to the exit date to edit, update the exit date to reflect the date of the client's death, include the reason for leaving to indicate, "death" and click "save and continue").

Acknowledgment

By signing this form, you affirm that the information on this report is true the best of your knowledge.

Preparer Signature

Program Manager Signature

Date

Date

#### Attachment F: Deliverable Exemption Form



The Community Partnership for the Prevention of Homelessness Contract Deliverable Exemption Form

The Community Partnership for the Prevention of Homelessness (TCP) requires any contractor to submit deliverables to support the contract. All contract deliverables are required for submission within <u>7 business days</u> of the date of contract execution. TCP understands that there may be deliverables that are not applicable to specific contracts. An example of a deliverable exemption may be the submission of the Lead Based Paint Disclosure Form which confirms that a facility has been inspected for lead based paint. This document is only required for site-based programs but is not required for scattered site programs.

Please utilize this document to note a deliverable exemption as well as reasoning for exemption.

\*Please note that the submission of a Deliverable Exemption Form is required for each deliverable exemption. TCP will not accept a Deliverable Exemption Form that includes multiple deliverable exemptions. Deliverable Exemption Forms must be uploaded to the respective deliverable upload fields in Salesforce.

	Contract Information	
Provider Name:	Program Name:	
Contract Number:	Contract Period:	

#### **Deliverable Exemption**

1. Contract Deliverable that requires exemption (Document Title):

- 2. What is the reason for exemption? (Please provide a detailed response):
- 3. Is the exemption noted above temporary or permanent? (Please check one of the below options):

□ Temporary

Permanent

4. If the exemption noted above is temporary, please indicate when the deliverable of interest will be submitted to TCP:

#### Staff Authorization (To be completed by Provider)

By signing this form, you acknowledge that the information noted above is true and correct and has been reviewed and approved by the Executive Director of the agency. By signing below, you also acknowledge that the deliverable exemption noted above must be approved by TCP staff. If the above deliverable exemption is not approved, the identified deliverable must be submitted to TCP within five (5) business days from return of this document unless otherwise indicated by TCP staff.

Preparer Name and Title						
Preparer Signature	Date					
Executive Director Signature	Date	_				
TCP S	Staff Only					
Deliverable Exemption Approved:						
Yes 🗆 No 🗆						
If not approved, reason for non-approval:						
		]				
Date of Required Deliverable Submission:						
		]				

**TCP Staff Signature** 

Date



## TCP Deliverable Submission/ Payment Clearance Receipt Form DHS Contracts

**Overview:** The Community Partnership for the Prevention of Homelessness (TCP) requires all contractors to submit deliverables to support their contract. All contract deliverables are required for submission within <u>7 business days</u> of the date of contract execution via the Content Snare platform. TCP has sent this document to your agency's executive leadership as a receipt of deliverable submission and clearance for contract payment. Please retain this document for your records. For more information on the required deliverables, please review your contract or visit our website: <u>Contract Deliverables - The Community Partnership (community-partnership.org)</u>

Contract Information					
Point of Contact Name: Contract Number:					
Point of Contact Title:	Contract Period:				
Point of Contact Email:	Provider Name:				
Date of Deliverable Submission Program Name:					
Deliverable Review					

If it is noted below that deliverables for any of the deliverable categories were not accepted by TCP, one or more of your contract deliverables require correction/resubmission are noted in the below chart. Please review the comments left on your contract's Content Snare profile for further instruction to resolve any issues with submitted or missing deliverables.

Deliverable Category	Deliverables Accepted? Y/N	If not accepted, please indicate which deliverables require correction/resubmission.
Finance Deliverables		
Master Deliverables		
Tier One Deliverables		

#### **Employee Background Clearances Review**

Please utilize the following chart as receipt of accepted employee background clearance(s). All employees listed on the Staffing List (TCP 905 Form) **<u>must</u>** have their background clearances submitted to the <u>TCP Employee Background Clearance Submission Form</u>.

Staff Member Name (As listed on the submitted 905 Form)	Background Clearances Accepted? Y/N	If not accepted, please indicate corrections/resubmissions needed.

		TCI	P Approval	
Resubmission Needed Eligible for Payment	□ Yes □ Yes	□ No □ No	Resubmission Dead Date of TCP Review	
Х				

TCP Reviewer Signature

#### Attachment H – Deficiency Notice Form

### **Notice of Deficiency**

The Community Partnership for the Prevention of Homelessness finds that your agency is not in compliance with the contract for one or more reasons noted below. Please adhere to all deadlines and submission requirements as stated on this notice. <u>Failure to submit the</u> <u>requested item(s) by the stated time and date outlined below will result in the withholding of payment</u> on any contract with The Community Partnership for the Prevention of Homelessness and will also be factored into the ranking of your agency for future funding opportunities.

			Contro	act Informa	ation			
	Program							
Provider	Provider Name: Name:							
Contract								
Contract	Number:				Period:			
Executive	e Director:							
			Last		First		Email Address	
Program	Manager:							
			Last		First		Email Address	
			Reaso	n for Defi	ciency		Missing Housing 8	
	Missing Contract		Fire Drill Log		Missing Client		Missing Housing & Participant	
	Deliverables		Submission		Satisfaction Surveys		Assessment Report	
	Deliverables		500111551011		Satisfaction Surveys		Assessment Report	
	Failure to Report		Failure to Comply					
	Required		with Corrective					
	Information		Action Plan		Other:			
<b>Factual</b>	Basis for Deficiency:							
Date to	Correct Deficiency:							
	-							
Correcti	ve Action Plan:							
<u></u>								
	TCP Acknowledgement							

Notice Issued By Name

Notice Issued By Signature

Date

			For	TCP Sta	ff Use Only	
Status Document Submission:		Accepted			Rejected	
If accepted, confirmation sent to P	Provider					Date of Forward:
If reject, resubmission requested:						Date Requested:
Additional Notes If Rejected:						