

Policy Title	CoC Board Required Technical Assistance Plans and Corrective Action Plans
Date Developed/Revised	October 2017
Date Adopted by CoC Board of Directors	November 6, 2017
Signed (CoC Board Chair)	Meghan Takashima

I. Policy

The Detroit CoC is committed to ensuring that projects serving people experiencing homelessness are operating in compliance with regulations, written standards, contractual obligations, and are of the highest quality possible. This policy details the process by which the CoC determines when agency or project technical assistance is needed and the process by which such assistance is provided.

This policy aligns with the Detroit Continuum of Care Governance Charter which states that the Detroit CoC Board of Directors is responsible for “tak[ing] action against poor performers”. The Governance Charter states that the CoC Lead Agency is designated to carry out this responsibility.

II. Definitions

For the purposes of this policy, the following definitions apply:

A. Technical Assistance

A broad term that encompasses various activities, training, coaching, policy review and development, or the like for the purpose of improving agency and project performance and/or to ensure compliance with regulations or program standards.

B. Technical Assistance Plan (TAP)

A written plan agreed to by both the CoC Board (or CoC Lead Agency on behalf of the Board) and the agency that describes the technical assistance the agency will receive. Such technical assistance may be provided via a variety of means (in person, on-line, from local or national entities, etc) and will be specified in the plan. The plan will include specifics regarding the topics to be covered by the TAP, timeframe for implementation, and expected outcomes.

C. Corrective Action Plan (CAP)

A written plan agreed to by both the CoC Board (or CoC Lead Agency on behalf of the Board) and the agency that describes the specific steps or actions that the agency is expected to take to improve project performance and/or become compliant with contractual, regulatory, or performance expectations. The plan will include specifics regarding the topics to be covered by the CAP, timeframe for implementation, reporting protocol, and compliance expectations.

III. Determining Need for a Technical Assistance Plan (TAP) or a Corrective Action Plan (CAP)

The process by which the CoC Lead Agency determines that an organization or project needs a TAP or a CAP may occur because of the following (note, this is not an exhaustive list):

- An appeal.
- Regular project performance and monitoring.
- A report of findings, concerns, or other statements made by another funder or governing entity.
- A substantiated grievance filed against an agency.
- Non-compliance with regulations, written standards, or contractual agreements.

- Any review, analysis, or monitoring of data or project performance (either at an individual project level or systems level) conducted by the CoC Lead Agency in which it becomes apparent that technical assistance is necessary.

IV. Nature and Extent of Technical Assistance

The nature of the technical assistance, and the extent to which the technical assistance will be required, will vary depending upon the need being addressed. Such technical assistance may include, but not necessarily be limited to:

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

V. Compliance Expectations

Agencies that are under a TAP or a CAP are expected to comply with the terms of the plans. Agencies under a TAP are expected to participate in the technical assistance provided. Agencies under a CAP are expected to comply with the performance and reporting expectations, or other expectations, as given in the plan.

VI. Non-Compliance

Non-compliance with Technical Assistance Plans or Corrective Action Plans will be handled on a case-by-case basis, but may include actions that impact the agency's funding. Additionally, individual plans may contain specific consequences for not meeting specific plan requirements, depending upon the need the plan is addressing. Any actions impacting any agency's CoC funding must be approved by the CoC Board.