**Supportive Services for Veteran Families (SSVF)**

**Financial and Operational Fitness Audit (FOFA)**

**Subcontractor Monitoring Tool**

Per 38 CFR Part 62.22(c)(2)(i), SSVF grantees need to have adequate controls in place to regularly monitor the program, **including any subcontractors**, for compliance with all applicable laws, regulations, and guidelines. The goal of the **Subcontractor Monitoring Tool** is to ensure that any third-party contractor working directly for a SSVF Program is delivering the same high-level of service expected of direct recipients of SSVF funds. SSVF Grantees should use this tool when monitoring subcontractors. As Grantees subcontract for a range of services, not all sections of this tool may be needed.

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| **For All Subcontractors** |
| A signed Memorandum of Understanding (MOU) is required for all subcontractors receiving SSVF funds. |
| ☐ An MOU is in place, signed by all parties, and current for this fiscal year. |
| ☐ The MOU has payment guidelines and a statement about how it can be amended. |
| ☐ The MOU contain descriptions of the type of activities that the subcontractor will perform. |
| ☐ The MOU describes how often and in what ways the subcontractor will be managed by the Grantee. |
| ☐ The MOU, or separate written policy, describes how often and in what ways the subcontractor will be monitored by the Grantee. Should include quarterly assessments and annual monitoring of performance. |
| ☐ The Grantee has a copy of the subcontractor SSVF policies and procedures, if the subcontractor follows the SSVF policies and procedures developed by the Grantee this is stated in the MOU or in a separate document. |
| ☐ The subcontractor submits invoices to the Grantee in the time periods specified in the MOU. |
| ☐ The invoices include all backup documentation so that the Grantee can confirm all costs are eligible. |
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| **Depending on the type of services subcontracted, use the additional checklists below:** |
| **Subcontract for Legal Services** |
| ☐ The legal provider responds to clients referred to them within \_\_\_ hours/days. |
| ☐ Clients report to case managers that they are satisfied with the services provided by the legal team. |
| ☐ Legal subcontractor provides reports to Grantee outlining type of referral and outcomes. |
| ☐ Legal outcomes are overall positive and clients get legal needs addressed, deidentified results are sufficient. |
| ☐ Legal provider trains case management staff on legal issues to listen for with clients and when to refer. |
| ☐ Legal provider is responsive to grantee when there are client or contract needs to address. |
| ☐ Additional Contractual Requirements: (As necessary) |
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| **Subcontract for Screening/Prescreening Services** |
| ☐ The number of clients referred meets the expectations set out in the MOU. |
| ☐ The majority of referrals from the provider are for eligible clients. |
| ☐ The provider has a clear understanding of SSVF as demonstrated through conversations with those referred. |
| ☐ Additional Contractual Requirements: (As necessary) |
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| **Subcontract for Employment Services** |
| ☐ The employment provider responds to clients referred to them within \_\_\_ hours/days. |
| ☐ Clients report to their case managers that they are satisfied with the services provided by the subcontractor. |
| ☐ Employment subcontractor tracks client progress and outcomes and provides reports to grantee outlining each client’s employment plan and outcomes. |
| ☐ Employment outcomes are overall positive, and clients find work in a timely manner if engaged with provider. |
| ☐ A variety of employment is achieved from entry level to specialized and higher paying positions. |
| ☐ Employment subcontractor attends job fairs for leads and sends employment postings to clients and grantee. |
| ☐ Additional Contractual Requirements: (As necessary) |
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| **Subcontract for Outreach Services** |
| ☐ Outreach logs and records are submitted for Grantee’s review within the time period identified in the MOU. |
| ☐ Outreach logs indicate clear outreach to all counties/towns that the subcontractor is required to cover. |
| ☐ Outreach is consistent and occurs in the frequency required per the MOU. |
| ☐ Outreach activities include engaging hard-to-reach, low-income Veterans. |
| ☐ Outreach logs include evidence of outreach to: private organizations, state agencies, local government agencies, community providers, local CoCs, local law enforcement, faith-based organizations, Veteran court programs, and show evidence of other “out-of-the-box” outreach strategies employed. |
| ☐ Additional Contractual Requirements: (As necessary) |
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| **Subcontract for Case Management Services** |
| *It is highly recommended that on a quarterly basis, Grantees complete the SSVF Case File Tool on a random selection of subcontractor files.* |
| ☐ Files have clear evidence of eligible Veteran status. |
| ☐ Files have evidence of Veteran’s housing status: Homeless Prevention (HP) or Rapid Rehousing (RRH)...etc. |
| ☐ HP files have the completed screening tool and meet the set threshold score, if receiving TFA. |
| ☐ Files have clear income and asset documentation to show client is under 30% or 50% AMI. |
| ☐ Clients in the program over 90 days are recertified, including updated housing and income documentation. |
| ☐ Exited files have the SSVF Exit Checklist or similar exit assessment. |
| ☐ If self-certifying housing status or income, there are clear written attempts at getting third party documentation. |
| ☐ All client files have signed releases of information for each third party addressed, including HMIS release. |
| ☐ All files have a signed Staff Certification of Eligibility and a Staff Re-certification of Eligibility (if applicable). |
| ☐ There is evidence the client has been entered into HMIS through case file note or a manager’s HMIS log. |
| ☐ There are “screened but not enrolled” logs, including reasons for denial and where Veterans were referred. |
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| **Services** |
| ☐ Staff clearly understand housing first and how to implement and house Veterans stably using the approach. |
| ☐ Files have clear referrals to VA programs and follow up to those referrals documented in the files. |
| ☐ Files have clear referrals to mainstream programs and follow up to those referrals documented in the files. |
| ☐ Files have individualized plans with goals, action steps, person responsible, and ongoing assessments of plans with updated goals and actions steps as steps and goals are accomplished. |
| ☐ Files have clear evidence of housing counseling, including assistance with housing search if needed. |
| ☐ Files have clear evidence of assessing client needs and offering services or referrals based on those needs. |
| ☐ Files have Rent Reasonableness assessments if paying housing costs. |
| ☐ Files have proof of Housing Quality Standard inspection for Veterans moving into new or different units. |
| ☐ Files with TFA payments have statements regarding “but for” and the necessity of the payment for stability. |
| ☐ Files have proper backup documentation and invoices for all costs paid on behalf of a client, including proof the check went out to the appropriate third party, and taking clear steps to prevent fraud. |