

Document Type:¹

☒ Policy & Procedure ☐ Process Guideline
☐ Plan ☐ System Description

Adopted: 5/4/2023
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Revisions: _____

Document Scope: (applies to Policy & Procedure only)

- ☒ The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
- ☐ The requirements herein apply, verbatim, to GCBH BH-ASO and its subcontractors¹.
- ☐ The requirements herein apply both to GCBH BH-ASO and its subcontractors¹. Additionally, subcontractors must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which subcontractors are responsible.

PURPOSE: To provide guidance to Greater Columbia Behavioral Health BH-ASO as a CBRA lead grantee on the requirements of the Department of Commerce regarding risk assessments, monitoring activities, and monitoring frequency of any subcontractor of the CBRA program consistent with the CBRA guidelines.

DEFINITIONS:

- I. Community Behavioral Health Rental Assistance (CBRA): Program to provide a rental subsidy for high-risk individuals with behavioral health conditions.
- II. Subgrantee: An organization with which Greater Columbia Behavioral Health, LLC is subcontracted with for the provision of the CBRA program.

POLICY

- A. To ensure GCBH BH-ASO is following the CBRA guidelines related to completing risk assessments, monitoring activities and frequency of monitoring of all subgrantees of the CBRA program.

PROCEDURE

1. GCBH BH-ASO's Supportive Housing Program Specialist will be responsible for ensuring a risk assessment is completed within 6 months of contracting CBRA funds to a subcontractor. The risk assessment will be based on the template provided by the Department of Commerce.
2. Based on the results of the Risk Assessment, and within 6 months of subcontracting, GCBH BH-ASO's Supportive Housing Program Specialist will develop a monitoring plan to include:
 - 2.1. Frequency of monitoring
 - 2.2. Monitoring dates
 - 2.3. Type of monitoring (remote, on-site)
 - 2.4. Program requirements being reviewed

3. GCBH BH-ASO understands that the Department of Commerce reserves the right to require GCBH BH-ASO to undertake special reviews when an audit or other emerging issue demands prompt intervention and/or investigation. GCBH BH-ASO also reserves the right, independent of a request from the Department of Commerce, to modify any subgrantee's monitoring plan as appropriate to ensure compliance with the contract.
 - 3.1. GCBH BH-ASO will promptly notify the Department of Commerce of any changes in the monitoring plan and/or concerns with subcontractors consistent with the Grant Agreement and the CBRA guidelines.
 - 3.2. Any performance concerns will be addressed through appropriate recommendations, findings and/or corrective actions required for performance improvement and consistent with the contract.

APPROVAL



Karen Richardson or Sindi Saunders, Co-Directors



Date