



Policies & Procedures: Promoting Program Excellence

National HOPWA Institute - 2017
Tampa, FL



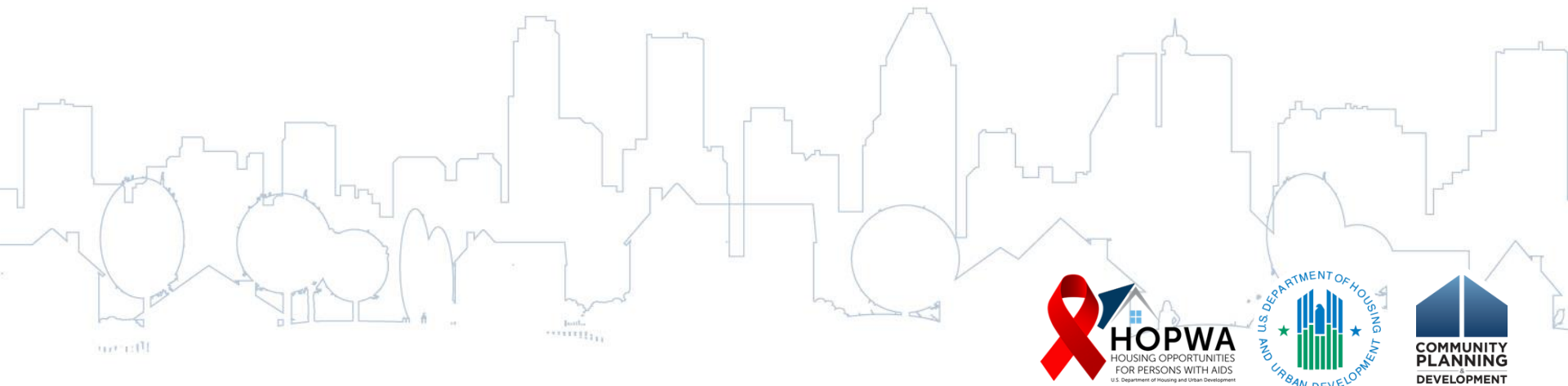
Presentation Objectives

- Describe role Policies & Procedures (P&P) play in strong grant management
- Highlight primary areas to address with P&P
- Take a closer look at a few key P&P elements
- Review how to develop and put into use P&P



The HOPWA Institute:

“Housing’s Role in Ending the HIV Epidemic”



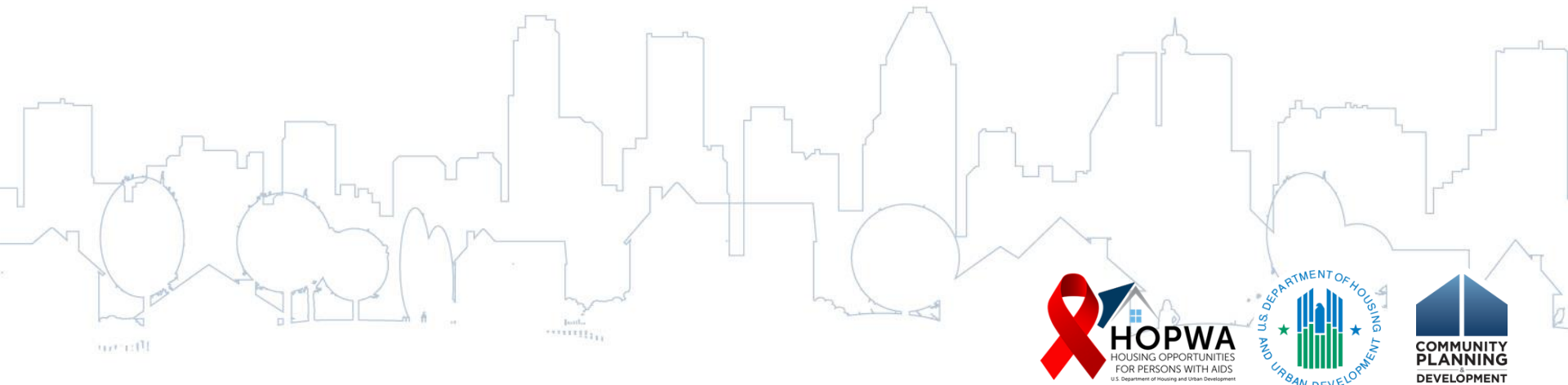
TOPICS

- Who Needs Policies & Procedures?
- True Confessions
- Why Have Policies & Procedures?
- What Should Policies & Procedures Include?
- Deeper Dive: Activity-Specific Standards
- Deeper Dive: Documentation Standards
- Deeper Dive: Financial Management
- Deeper Dive: Confidentiality Standards
- Deeper Dive: Program Agreements
- How Do You Develop Them?
- Care and Feeding of Your P&P



Who Needs To Have Them?

Everybody!



Seriously, Who Should Have Them?

HOPWA Grantees

- Covering community-wide policies and standards
- Framing compliance and requirements for Project Sponsors
- Describing monitoring and oversight



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Seriously, Who Should Have Them?

HOPWA Project Sponsors

- Describing Services/Resources Provided
- Articulating Standards for Eligibility, Participation and Documentation
- Detailing Rights and Responsibilities



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True Confessions

Grantees, how many of you:

- Have written HOPWA P & P?
- Know where to find HOPWA Program Regulations and Guidance?
- Have standardized HOPWA forms?
- Train your Project Sponsors on HOPWA guidelines?
- Make your HOPWA P & P and forms available on the internet?



True Confessions

Project Sponsors, how many of you:

- Have written HOPWA P & P?
- Know where to find HOPWA Program Regulations and Guidance?
- Coordinate your HOPWA Policies with your Grantee?
- Use materials provided to you by your Grantee or HUD?



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Why Have Policies and Procedures?

Well-Organized and Developed Policies and Procedures Are the KEY to Coordinated HOPWA Grant Management

HUD Policies →

Grantee Planning & Policies →

Project Sponsor Policies & Implementation



Why Have Policies and Procedures?

P&P Promote Program Excellence By:

Coordinating standards and requirements with Planning and Procurement documents:

- Action Plan
- Consolidated Plan
- HOPWA procurement
- HOPWA contracts



Why Have Policies and Procedures?

P&P Promote Program Excellence By:

Providing a **community-wide framework** for all HOPWA program operations and delivery

Supporting community-wide and agency-level **consistency in program implementation**



Why Have Policies and Procedures?

P&P Promote Program Excellence By:

Bolstering local capacity to **understand and comply with HOPWA and other federal program requirements**

Providing HUD, the Grantee, and its Project Sponsors with a **consistent framework for monitoring and oversight.**



Why Have Policies and Procedures?

P&P Promote Program Excellence By:

Providing HOPWA clients and their family members with:

- Consistent operating standards for assistance
- Basis for understanding (and appealing) program-related decisions
- Fair and equal access to HOPWA resources



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What Should P&P Include?

Grantee and Project Sponsors vary **widely** in what they do, how HOPWA resources are provided, and how they are structured

Policies and Procedures should **always** be tailored to community- and program-level needs and program models

**The following lists are NOT exhaustive.*



What Should P&P Include?

Grantee P&P Basics

- Description of activities, synced with Con and Action Plans
- Activity-Specific Policies/Standards
- Standards for Housing Needs Assessment and Planning
- Confidentiality Standards



What Should P&P Include?

Grantee P&P Basics

- Documentation Requirements
- Data Collection & Reporting Requirements
- Invoicing Requirements
- Monitoring & Oversight Procedures
- Standardized Forms



What Should P&P Include?

Project Sponsor P&P Basics

- Conflict of Interest
- Fair Housing and Equal Opportunity
- Faith-Based Organization (if applicable)



What Should P&P Include?

Project Sponsor P&P Basics

- Description of Services/Resources Offered
- Activity-Specific Policies/Standards
- Eligibility Requirements
- Documentation Requirements



What Should P&P Include?

Project Sponsor P&P Basics

- Confidentiality Standards
- Due Process and Termination Standards
- Any Participation Requirements (e.g. Agreements)
- Organizational Financial Management



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Deeper Dive: Activity-Specific Standards

These are Standards that May **Go Beyond** Basic HOPWA Regulations

TBRA:

- Target Populations
- Local Payment Standards

STRMU:

- Definition of eligibility
- Caps on Assistance
- Determining 21 Weeks of Assistance

Facility-Based Housing:

- Target Populations
- Time Limits for Transitional Housing
- Housing Models



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Deeper Dive: Documentation Standards

- Eligibility
 - Income, Household Composition, HIV Status, Need, Priority
- STRMU: Proof of Responsibility to Pay
 - Lease, Mortgage Costs, Utility Bills
- Household Members & Income
 - All household members, Included & Excluded income
- Standardized File Checklists



Deeper Dive: Documentation Standards

- Participant Rent Payment Calculations
 - Documentation of Compliant Calculation
- Unit Eligibility
 - Rent Reasonableness, Fair Market Rent, Lead-Based Paint, Habitability Standards, Proof of Ownership
- Housing Plans & Case Management
 - Needs Assessments, Housing Stability Plans, Referrals, Client Interactions
- Annual Recertification of Income and Unit
 - Updated Household Composition, Updated Income Data



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Deeper Dive: Financial Management

- Personnel Time-Keeping
 - After-the-fact recording of allocated time
- Cost Allocation Policies
 - Treatment of Direct and Indirect Costs
- Documentation Oversight
 - Who/How/What of Review and Sign-Off On Client and Staff Records



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Deeper Dive: Confidentiality Standards

- Set minimum standards for consent to release information
- Describe how HIV status will be protected
- Describe how client records will be protected
 - Paper records
 - Electronic records
- How privacy breaches will be handled



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Deeper Dive: Program Agreements

Program Agreements for Participants can be useful to clarify:

- Rights and Responsibilities
- Grounds for Termination
- Participation Expectations



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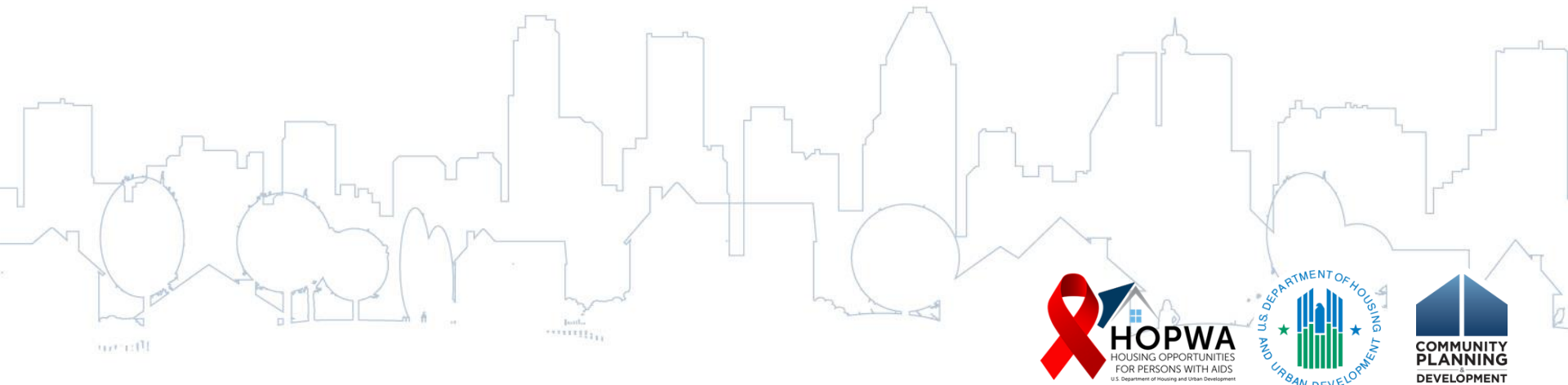


How Do You Develop Them?

Consult HOPWA & Other Regulations

Consult with HUD – HOPWA Guidance Materials

Internet Search!



How Do You Develop Them?

Grantees

- Use Planning and Procurement Documents and Processes To Inform Standards and Policies
- Consult with Community Stakeholders
- Review with HUD



How Do You Develop Them?

Project Sponsors

- Build on Grantee Standards and Documents
- Consult with Clients
- Review for Approval with Senior Management Responsible for Program and Organizational Operations
- Review with Grantee



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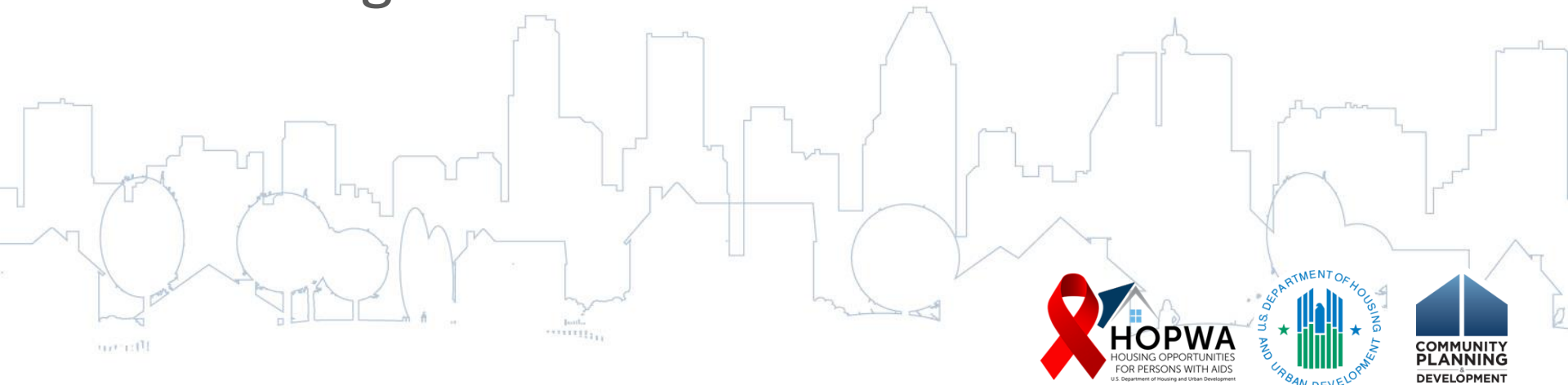
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The Care and Feeding of Your P&P

Don't just keep them on the shelf!

They are the KEY to coordinated grant management.



The Care and Feeding of Your P&P

Grantee - Incorporate Policies and Procedures Into Contracts

- Documentation and Reporting Requirements
- Eligible Activities
- Activity Standards
- Standard Forms



The Care and Feeding of Your P&P

Grantee – Make HOPWA P & P Available on Web

State of Texas HOPWA Page: <https://www.dshs.texas.gov/hivstd/hopwa/>

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HOPWA Page

DSHS HOPWA Program Manual and Guides

HOPWA Program Manual (Word : 611 kb)
Determining Household Annual Gross Income (Word : 162 kb)
Determining Household Annual Adjusted Income (Word : 160 kb)

Enrollment Packets

DSHS HOPWA Program Enrollment Packets

Program Enrollment Packet (English) (Word : 139 kb) - includes all Word documents but does not include Excel documents below
Program Enrollment Packet (Spanish) (Word : 140 kb) - includes all Word documents but does not include Excel documents below

DSHS HOPWA Program Individual Forms - Program Entry

	File Structure Checklist (Word : 79 kb)
Form A	Self-Declaration of Income (English) (Word : 20 kb)
Form A	Self-Declaration of Income (Spanish) (Word : 22 kb)
Form B	Self-Declaration of Residency (English) (Word : 19 kb)
Form B	Self-Declaration of Residency (Spanish) (Word : 20 kb)
Form C	Household Income Eligibility Worksheet (Word : 21 kb)
Form C	Household Income Eligibility Worksheet - Alternate (Excel : 170 kb)
Form D	HOPWA Program Agreement (English) (Word : 19 kb)
Form D	HOPWA Program Agreement (Spanish) (Word : 21 kb)



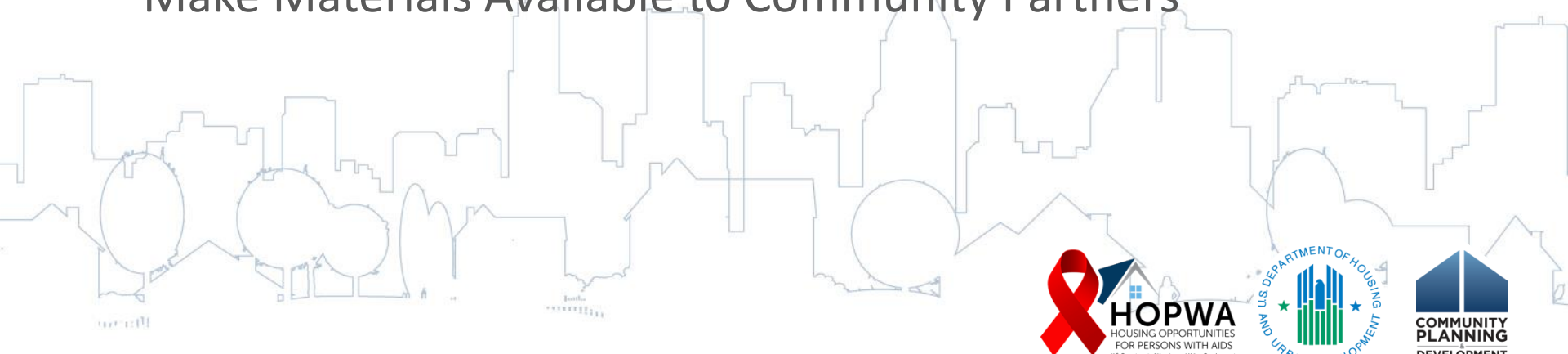
The Care and Feeding of Your P&P

All - Regularly Train Program Staff on P & P

Cross-Train with Other Program or Department Staff

- Other HUD or HIV Programs
- Fiscal, Quality Assurance, and Monitoring

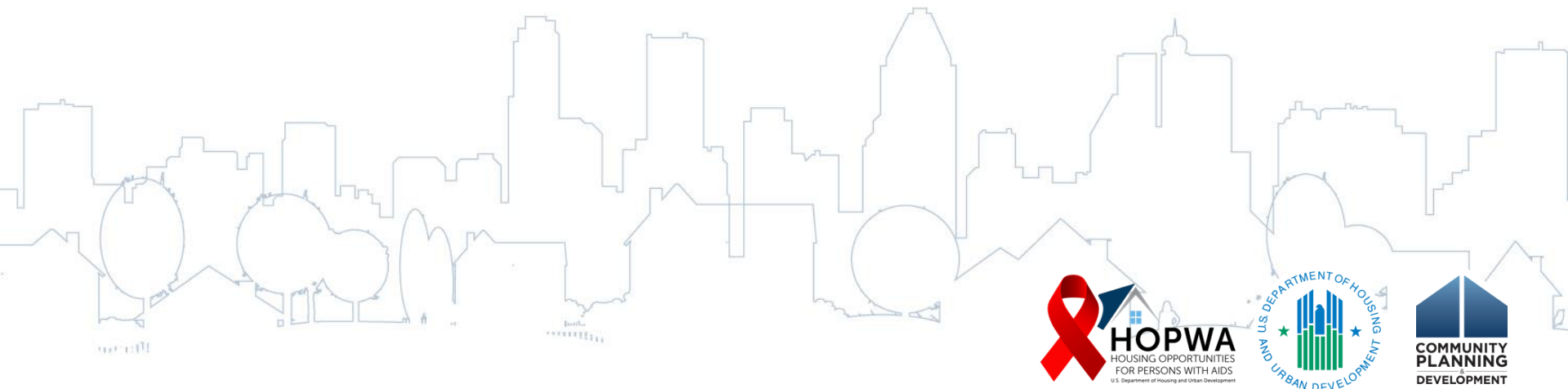
Make Materials Available to Community Partners



The Care and Feeding of Your P&P

All – Review and Update P & P Regularly

- Feedback from stakeholders
- Respond to changing conditions



Questions?

