

APPENDIX Q
DSHS Housing Opportunities for Persons with AIDS (HOPWA)
Monitoring Tools

Administrative Agency:	_____	Planning Region:	_____
Program Staff Present:	_____	DSHS Reviewer:	_____
Program Period Reviewed:	_____ to _____	DSHS Review Dates:	_____ to _____
Physical Address:	_____		
Mailing Address:	_____		
Contract Number:	_____	Contract Term:	_____ to _____

Project Sponsors:	HIV Service Delivery Areas:	Administrative Agency Monitoring Completion Dates:
1 _____	_____	_____
2 _____	_____	_____
3 _____	_____	_____
4 _____	_____	_____
5 _____	_____	_____
6 _____	_____	_____
7 _____	_____	_____
8 _____	_____	_____
9 _____	_____	_____
10 _____	_____	_____
11 _____	_____	_____
12 _____	_____	_____

Instructions

The DSHS reviewer sends this tool to the Contract Management Section (CMS) and CMS sends it to the Administrative Agency (AA). The AA electronically submits monitoring documents to the reviewer by the deadline provided in the monitoring announcement letter. See tab 1 for a checklist of AA documents. See tab 2 for a checklist of Project Sponsor documents. The reviewer should plan to monitor at least one of the AA's Project Sponsors (see the monitoring schedule in the DSHS HOPWA Program Manual).

Status Legend

DSHS will indicate if the AA has met monitoring requirements using these ratings:

M	Met/Meets Expectations	NE	Not Evaluated
PM	Partially Met	NA	Not Applicable
NM	Not Met/Needs Improvement		

Definitions

Observations are comments based on what the reviewer has seen, heard, or noticed related to program implementation during the monitoring (e.g., how the AA follows policies and/or procedures, uses tools, meets requirements, etc.).

Recommendations are suggestions for the AA to consider that are not requirements.

Requirements are areas that need improvement via corrective action to comply with federal and state regulations, policies, standards, and guidelines.

NOTE

AA staff are expected to be familiar with the HOPWA Grantee Oversight Resource Guide, DSHS HOPWA Program Manual and Guides, Statement of Work, Health and Human Services Commission (HHSC) Uniform Terms and Conditions, and HOPWA regulations at 24 Code of Federal Regulations (CFR) Part 574.

NOTE: To AutoFit row height to cell contents, locate the cell's row heading and double-click the lower edge of the heading. To start a new paragraph in a single cell, hit Alt+Enter.

**DSHS HOPWA Program
Administrative Agency Review Tool**

AA Monitoring Documents Checklist

Agreements	Tool Location	Received	Notes
• Contracts for Project Sponsors	Part A Item 3		
• Contracts for monitoring services (If applicable)	Part C Item 1		
Certificates	Tool Location	Received	Notes
• AA Staff: CPD Financial Management Curriculum	Part A Item 4		
• AA Staff: HOPWA Oversight Training Curriculum	Part A Item 4		
• AA Staff: HOPWA Getting to Work Training Curriculum	Part A Item 4		
• AA Staff: HUD Lead-Based Paint Visual Assessment Training Course	Part A Item 4		
Procurement	Tool Location	Received	Notes
• Contract proposals/applications/renewals for AAs	Part A Item 2	Yes	DSHS already has this on file.
• Contract proposals/applications/renewals/Data Sheets for Project Sponsors	Part A Item 2		
Policies and/or Procedures	Tool Location	Received	Notes
• Procurement	Part A Item 1		
• Reallocations	Part B Item 1		
• Anti-discrimination	Part C Item 1		
• Confidentiality at the AA level	Part C Item 2		
• Conflict of interest	Part C Item 3		
• Grievances of clients and bidders	Part C Item 4		
• Monitoring	Part C Item 5		
Evidence	Tool Location	Received	Notes
• Followed procedure for procurement	Part A Item 1		
• Followed procedure for reallocations	Part B Item 1		
• Followed procedure for anti-discrimination	Part C Item 1		
• Followed procedure for confidentiality at the AA level	Part C Item 2		
• Followed procedure for conflict of interest	Part C Item 3		
• Followed procedure for grievances of clients and bidders	Part C Item 4		
• Followed procedure for monitoring using a publicized tool	Part C Item 5		
• Collaborated with Project Sponsors to develop local program policies as needed	Part C Item 9		
Reports	Tool Location	Received	Notes
• Semi-annual Exhibit A and Program Progress Report for AAs	Part A Item 5	Yes	DSHS already has this on file.
• Annual Exhibit A and Program Progress Report for AAs	Part A Item 5	Yes	DSHS already has this on file.
• Monthly Exhibit Bs for AAs	Part A Item 6	Yes	DSHS already has this on file.
• A-133 Single Audit	Part B Item 3		
• Completed monitoring reports for Project Sponsors	Part C Item 7		
• Completed HSDA needs assessment reports with a housing component	Part C Item 8		
Tools	Tool Location	Received	Notes
• Publicized monitoring tool for Project Sponsors	Part C Item 6		
• HSDA needs assessment tool with a housing component	Part C Item 8		

**DSHS HOPWA Program
Administrative Agency Review Tool**

Part A: AA Administration		Status	Observations
1 AA had a policy and/or procedure for procurement. AA used their policy and/or procedure for procurement and AA submitted evidence that they followed their policy and/or procedure. <i>24 CFR §574.605, 2 CFR §200</i> Recommendations			
		Requirements	
2 DSHS had AA contract proposals/applications/renewals on file. AA had Project Sponsor contract proposals/applications/renewals/budgets/Data Sheets on file. <i>24 CFR §574.605, 2 CFR §200</i> Recommendations			
		Requirements	
3 AA had Project Sponsor contracts on file. <i>24 CFR §574.500, 24 CFR §574.605, 2 CFR §200</i> Recommendations			
		Requirements	
4 AA had the following training certificates for at least one AA staff member: - CPD Financial Management Curriculum - HOPWA Oversight Training Curriculum - HOPWA Getting to Work Training Curriculum - HUD Lead-based Paint Visual Assessment Training Course Reviewer will list all AA staff member names, agencies, and certificates under Observations. <i>HOPWA Formula Grant Operating Instructions, HOPWA Rental Assistance Guidebook</i> Recommendations			
		Requirements	
5 AA had AA Semi-Annual and Annual Exhibit As and Program Progress Reports (PPRs). AA Exhibit A expenditure data matched Project Sponsor PPR expenditure data. <i>24 CFR §574.520, 24 CFR §91.520</i> Recommendations			
		Requirements	

**DSHS HOPWA Program
Administrative Agency Review Tool**

6 AA cumulative expenditures totaled 95 percent of the contractual amount and household outputs totaled 95 percent of households-to-serve goals. Reviewer will use cumulative Exhibit B and Annual Program Progress Report (PPR) data as the basis for this conclusion. <i>DSHS Performance Measures</i>		
Recommendations	Requirements	

Part B: AA Fiscal	Status	Observations
1 AA had a policy and/or procedure for reallocations. The policy and/or procedure described protocols for reviewing funding utilization and preventing Project Sponsors from overspending/lapsing funds. If AA used their policy and/or procedure for reallocations, AA submitted evidence that they followed their policy and/or procedure. Reviewer will inquire about compliance with the policy and/or procedure if cumulative expenditures for any Project Sponsor activity were below 80 percent of the allocated amount for the respective activity. Reviewer will use cumulative Exhibit B data as the basis for this conclusion. <i>DSHS Requirement; 24 CFR §574.450; 2 CFR §200</i>		
Recommendations	Requirements	

2 AA limited reimbursements for Project Sponsor administrative costs, including non-service and indirect costs, to no more than seven percent of each Project Sponsor's total program allocation. Reviewer will use cumulative Exhibit B data as the basis for this conclusion. <i>24 CFR 5574.300; 24 CFR 5574.450; 2 CFR 200</i>		
Recommendations	Requirements	

3 AA had a single or program-specific audit conducted for the fiscal year and submitted evidence of the audit. A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year. <i>24 CFR 200.501</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Administrative Agency Review Tool**

Part C: AA Programmatic	Status	Observations
1 AA had a policy and/or procedure for anti-discrimination. -The Fair Housing Act protects people from discrimination because of race, color, religion, sex, age, national origin, familial status, or handicap. -The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule ensures that HUD's core programs are open to all eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status and is encoded in HOPWA regulations. -The Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule ensures an applicant or beneficiary of the DSHS HOPWA Program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the unit on the basis or as a direct result of the fact that the applicant or beneficiary is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking, if the applicant or beneficiary otherwise qualifies for admission, assistance, participation, or occupancy and is encoded in HOPWA regulations. -The HHSC Contract Uniform Terms and Conditions: Article 11.24 prohibit discrimination based on race, color, national origin, sex, age, disability, political beliefs, religion, or limited English proficiency. Project Sponsors may not deny any participation, aid, care, service, or other benefits provided by Federal or State funding based on these protected characteristics. If AA used their policy and/or procedure for anti-discrimination, AA submitted evidence that they followed their policy and/or procedure. <i>24 CFR §574.603; Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule; Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule; HHSC Contract Uniform Terms and Conditions: Article 11.24</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Administrative Agency Review Tool**

2 AA had a policy and/or procedure for confidentiality at the AA level. The policy was comprehensive and included the following: - Definitions of confidential data and protected health information (PHI) - Description of how confidentiality is maintained The policy must outline: - Who can access confidential information and for how long (e.g., after termination) - Breach procedures - Notification requirements - Mitigation activities - Sanction levels - Duty to warn or report The policy provided a confidentiality training schedule (annually at minimum) and designated an AA staff member as responsible for privacy and security (e.g., Privacy or Security Officer, Overall Responsible Party [ORP] or Local Responsible Party [LRP], Privacy Liaison, etc.). If AA used their policy and/or procedure for confidentiality at the AA level, AA submitted evidence that they followed their policy and/or procedure. <i>24 CFR §574.440; HHSC Contract Data Use Agreement; DSHS HIV/STD Security Policies and Procedures</i>		
Recommendations	Requirements	
3 AA had a policy and/or procedure or assurance process for conflict of interest. Per 24 CFR §574.625(a), no person who is an employee, agent, consultant, officer, or elected or appointed official of the AA and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for themselves or for those with whom they have family or business ties, during their tenure or for one year thereafter. AAs used their policies and/or procedures or assurance process for conflict of interest and AA submitted evidence (e.g., signed assurances) that they followed their policies and/or procedures or assurance process. <i>2 CFR §200.317 through §200.326; 24 CFR §574.625(a); DSHS HIV/STD Program Policies</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Administrative Agency Review Tool**

4 AA had a policy and/or procedure for grievances of clients and bidders. If AA used their policy and/or procedure for grievances of clients and bidders, AA submitted evidence that they followed their policy and/or procedure. <i>DSHS HOPWA Program Manual</i> Recommendations	Requirements	
5 AA had a policy and/or procedure for monitoring. The policy and/or procedure covered programmatic and fiscal monitoring, described protocols for remote and on-site monitoring, and specified how frequently the AA monitors Project Sponsors (e.g., following the monitoring schedule established in the DSHS HOPWA Program Manual or other periodic basis). AA used their policy and/or procedure for monitoring and AA submitted evidence that they followed their policy and/or procedure. If AA used a monitoring contractor, AA submitted a copy of the contract with the monitoring service. <i>24 CFR §574.410; 24 CFR §574.500; 24 CFR §91.330</i> Recommendations	Requirements	
6 AA either publicized their monitoring tool or sent their monitoring tool to Project Sponsors at least 30 days in advance of the monitoring start date. If AA publicized their tool, AA submitted evidence that the tool was publicized at least 30 days in advance of the monitoring start date. If AA sent their tool to Project Sponsors, AA submitted evidence that the tool was sent at least 30 days in advance of the monitoring start date. <i>DSHS Requirement; 24 CFR §574.410; 24 CFR §574.500; 24 CFR §91.330</i> Recommendations	Requirements	
7 AA had completed programmatic and fiscal monitoring of all their Project Sponsors. AA provided a copy of all monitoring reports, corrective action determinations, revisions, and resolutions to DSHS when they notified each Project Sponsor, but no later than 30 calendar days of the notification to the Project Sponsor. <i>24 CFR §574.410; 24 CFR §574.500; 24 CFR §91.330; DSHS HOPWA Program Manual; HOPWA Grantee Oversight Resource Guide</i> Recommendations	Requirements	

**DSHS HOPWA Program
Administrative Agency Review Tool**

8 AA had an HSDA needs assessment tool with a housing component. AA had completed HSDA needs assessment reports within the past 5 years at minimum for each HSDA. <i>DSHS Requirement; 24 CFR §574.500</i>		
Recommendations	Requirements	

9 If AA collaborated with Project Sponsors to develop local program policies as needed, including STRMU cap policies, AA submitted evidence of their collaboration (e.g. copies of emails, meeting notes, correspondence, or other documentation). <i>DSHS HOPWA Program Manual; HOPWA Short-term Rent, Mortgage, and Utility Assistance</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

Project Sponsor Monitoring Documents Checklist				
Agreements	Tool Location	Received	Notes	
• MOUs with local housing authorities/other housing service agencies (if applicable)	Part D Item 8			
Certificates	Tool Location	Received	Notes	
• Project Sponsor Staff: CPD Financial Management Curriculum	Part D Item 15			
• Project Sponsor Staff: HOPWA Oversight Training Curriculum	Part D Item 15			
• Project Sponsor Staff: HOPWA Getting to Work Training Curriculum	Part D Item 15			
• Project Sponsor Staff: HUD Lead-Based Paint Visual Assessment Training Course	Part D Item 15			
Policies and/or Procedures	Tool Location	Received	Notes	
• Affirmative outreach	Part D Item 1			
• Anti-discrimination	Part D Item 2			
• Confidentiality at the Project Sponsor level	Part D Item 3			
• Conflict of interest	Part D Item 4			
• Grievances	Part D Item 5			
• Rent standard increases (if applicable)	Part D Item 6			
• Requiring application to HCVP/other affordable housing	Part D Item 7			
• Restrictive program eligibility criteria (if applicable)	Part D Item 9			
• Restrictive service qualifications (if applicable)	Part D Item 10			
• STRMU and/or STSH Caps (if applicable)	Part D Item 11			
• Survivor grace periods	Part D Item 12			
• Termination	Part D Item 13			
• Waitlists for TBRA, STRMU, and FBHA services	Part D Item 14			
Evidence	Tool Location	Received	Notes	
• Followed procedure for affirmative outreach	Part D Item 1			
• Conducted affirmative outreach, shared information, and furthered fair housing.	Part D Item 1			
• Followed procedure for anti-discrimination	Part D Item 2			
• Followed procedure for confidentiality at the Project Sponsor level	Part D Item 3			
• Followed procedure for conflict of interest	Part D Item 4			
• Followed procedure for grievances	Part D Item 5			
• Followed procedure for rent standard increases	Part D Item 6			
• Tracked the number of households that received rent standard increases	Part D Item 6			
• Followed procedure for requiring application to HCVP/other affordable housing	Part D Item 7			
• Tracked household applications to HCVP/other affordable housing programs	Part D Item 7			
• Collaborated with HCVP/other affordable housing programs	Part D Item 8			
• Followed procedure for restrictive program eligibility criteria (if applicable)	Part D Item 9			
• Followed procedure for restrictive service qualifications (if applicable)	Part D Item 10			
• Followed procedure for STRMU and/or STSH caps (if applicable)	Part D Item 11			
• Followed procedure for survivor grace periods	Part D Item 12			
• Followed procedure for termination	Part D Item 13			

**DSHS HOPWA Program
Project Sponsor Review Tool**

• Followed procedure for waitlists for TBRA, STRMU, and FBHA services	Part D Item 14		
• Filed IRS Form 1099	Part D Item 19		
Reports	Tool Location	Received	Notes
• Semi-annual and Year-End Program Progress Reports for Project Sponsors	Part D Item 16	Yes	DSHS already has this on file.
• Three consecutive invoices for HOPWA expenditures submitted to the AA	Part D Item 18		
Tools	Tool Location	Received	Notes
• Rent standard increase tracking tool (if applicable)	Part D Item 6		
• HCVP/other affordable housing waitlist tracking tool	Part D Item 7		
• Waitlist management tool	Part D Item 14		
• Quality Assurance Plans/Strategic Plans/Work Plans with a housing component	Part D Item 17		

**DSHS HOPWA Program
Project Sponsor Review Tool**

Part D: Project Sponsor Requirements		Status	Observations
1 Project Sponsors had policies and/or procedures for affirmative outreach. Per 24 CFR §574.603(b), Project Sponsors must adopt procedures to ensure that all persons who qualify for the assistance, regardless of their race, color, religion, sex, age, national origin, familial status, or handicap, know of the availability of the HOPWA program, including facilities and services accessible to persons with a handicap, and maintain evidence of implementation of the procedures. AA submitted evidence that Project Sponsors conducted affirmative outreach in their communities, shared HOPWA information in their respective HSDA, and affirmatively further fair housing. <i>24 CFR §574.603(b)</i>			
Recommendations		Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

2 Project Sponsors had policies and/or procedures for anti-discrimination. -The Fair Housing Act protects people from discrimination because of race, color, religion, sex, age, national origin, familial status, or handicap. -The “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule,” ensures that HUD’s core programs are open to all eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status and is encoded in HOPWA regulations. -The Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule ensures an applicant or beneficiary of the DSHS HOPWA Program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the unit on the basis or as a direct result of the fact that the applicant or beneficiary is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking, if the applicant or beneficiary otherwise qualifies for admission, assistance, participation, or occupancy and is encoded in HOPWA regulations. -The HHSC Contract Uniform Terms and Conditions: Article 11.24 prohibit discrimination based on race, color, national origin, sex, age, disability, political beliefs, religion, or limited English proficiency. Project Sponsors may not deny any participation, aid, care, service, or other benefits provided by Federal or State funding based on these protected characteristics. <i>24 CFR §574.603; Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule; Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule; HHSC Contract Uniform Terms and Conditions, Article 9.21; HOPWA Formula Grant Operating Instructions</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

3 Project Sponsors had policies and/or procedures for confidentiality at the Project Sponsor level. The policies and/or procedures were comprehensive and included the following: - Definitions of confidential data and protected health information (PHI) - Description of how confidentiality is maintained The policies and/or procedures must outline: - Who can access confidential information and for how long (e.g., after termination) - Breach procedures - Notification requirements - Mitigation activities - Sanction levels - Duty to warn or report The policies and/or procedures provided a confidentiality training schedule (annually at minimum) and designated a Project Sponsor staff member as responsible for privacy and security (e.g., Privacy or Security Officer, Overall Responsible Party [ORP] or Local Responsible Party [LRP], Privacy Liaison, etc.). If Project Sponsors used their policies and/or procedures for confidentiality at the Project Sponsor level, AA submitted evidence that they followed their policies and/or procedures. <i>24 CFR §574.440; HHSC Contract Data Use Agreement; DSHS HIV/STD Security Policies and Procedures</i>		
<u>Recommendations</u>	<u>Requirements</u>	

**DSHS HOPWA Program
Project Sponsor Review Tool**

4 Project Sponsors had policies and/or procedures or assurance processes for conflict of interest. Per 24 CFR §574.625(a), no person who is an employee, agent, consultant, officer, or elected or appointed official of the project sponsor and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for themselves or for those with whom they have family or business ties, during their tenure or for one year thereafter. If Project Sponsors used their policies and/or procedures or assurance processes for conflict of interest, AA submitted evidence (e.g., signed assurances) that they followed their policies and/or procedures or assurance processes. <i>2 CFR §200.317 through §200.326; 24 CFR §574.625(a); DSHS HIV/STD Program Policies</i>		
Recommendations	Requirements	
5 Project Sponsors had policies and/or procedures for grievances of clients. The policies addressed follow-up timelines, outcomes, and reporting to DSHS as required. If Project Sponsors used their policies and/or procedures for grievances of clients, AA submitted evidence that they followed their policies and/or procedures. <i>DSHS HOPWA Program Manual</i>		
Recommendations	Requirements	
6 Project Sponsors had policies and/or procedures for rent standard increases (if applicable). Policies and/or procedures described the circumstances in which Project Sponsors would increase the rent standard for a proposed unit. On a unit by unit basis, Project Sponsors may increase the rent standard by up to 10 percent for up to 20 percent of the units assisted. If Project Sponsors used their policies and/or procedures for Rent Standard Increases, AA submitted evidence that Project Sponsors followed their policies and/or procedures. AA submitted evidence that Project Sponsors tracked the number of households that received increases. <i>24 CFR §574.320(a)(2)</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

7 Project Sponsors had policies and/or procedures for requiring application to the Housing Choice Voucher Program (HCVP) and other affordable housing programs. The policies and/or procedures required households if eligible, to apply for the HCVP/other affordable housing programs, renew applications as required, and accept assistance as offered. The policies and/or procedures included reasons households could seek a waiver (i.e., use DSHS HOPWA Program Form J: Housing Choice Voucher/Other Affordable Housing Waiver), consequences for non-compliance without justification, and procedures for tracking household applications. Project Sponsors must document the households that transitioned to the HCVP/other affordable housing program each year. If Project Sponsors used their policies and/or procedures for requiring application to the HCVP/other affordable housing programs, AA submitted evidence that Project Sponsors followed their policies and/or procedures. AA submitted evidence that Project Sponsors tracked household applications. <i>24 CFR §574.420; DSHS HOPWA Program Manual</i>		
Recommendations	Requirements	
8 AA submitted evidence of Project Sponsors collaborating with the HCVP/other affordable housing programs (i.e., a liaison with a regular pattern of communication) (e.g., MOUs if applicable, correspondence, meeting notes, etc.). <i>DSHS HOPWA Program Manual; HOPWA Rental Assistance Guidebook</i>		
Recommendations	Requirements	
9 Project Sponsors had policies and/or procedures for restrictive program eligibility criteria (if applicable). HUD permits the use of local preference as a means of prioritizing benefits to those who are most needy. "Local Preferences" must be approved through HUD's Office of Fair Housing and Equal Opportunity (FHEO) to ensure that such practices do not discriminate or inadvertently exclude any persons either by design or omission. If Project Sponsors used their policies and/or procedures for restrictive program eligibility criteria, AA submitted evidence that Project Sponsors followed their policies and/or procedures. <i>24 CFR §5.655; HOPWA Short-term Rent, Mortgage, and Utility Assistance</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

10 Project Sponsors had policies and/or procedures for restrictive service qualifications (if applicable). HUD permits the use of local preference as a means of prioritizing benefits to those who are most needy. "Local Preferences" must be approved through HUD's Office of Fair Housing and Equal Opportunity (FHEO) to ensure that such practices do not discriminate or inadvertently exclude any persons either by design or omission. If Project Sponsors used their policies and/or procedures for restrictive service qualifications, AA submitted evidence that Project Sponsors followed their policies and/or procedures. <i>24 CFR §5.655; HOPWA Short-term Rent, Mortgage, and Utility Assistance</i>		
Recommendations	Requirements	
11 Project Sponsors had policies and/or procedures for STRMU and/or STSH Caps (if applicable). If Project Sponsors used their policies and/or procedures for STRMU Caps, AA submitted evidence that they followed their policies and/or procedures. <i>DSHS HOPWA Program Manual; HOPWA Short-term Rent, Mortgage, and Utility Assistance</i>		
Recommendations	Requirements	
12 Project Sponsors had policies and/or procedures for survivor grace periods. Policies and/or procedures addressed provision of assistance to surviving or remaining household members living in the assisted unit at the time of the eligible individual's death, incarceration, lease bifurcation, enrollment in drug treatment, or entry to hospice/long-term health care. Policies and/or procedures stated that, in shared housing arrangements where two or more unrelated households lived together, grace periods could not be extended to other households. If Project Sponsors used their policies and/or procedures for grace periods, AA submitted evidence that Project Sponsors followed their policies and/or procedures. <i>24 CFR §574.310; 24 CFR §574.460</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

13 Project Sponsors had policies and/or procedures for termination. Policies and/or procedures included reasons households could be terminated from the program and formal termination procedures. Assistance may be terminated if the household violates program requirements or conditions of occupancy. Project Sponsors must ensure that supportive services are provided so that a household's assistance is terminated only in the most severe cases. In terminating assistance to any household for violation of requirements, Project Sponsors must provide a formal process that recognizes the rights of households to due process of law. This process at minimum, must consist of:

- Serving the household with a written notice containing a clear statement of the reasons for termination;
- Permitting the household to have a review of the decision, in which the household is given the opportunity to confront opposing witnesses, present written objections, and be represented by their own counsel, before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Providing prompt written notification of the final decision to the household.

If Project Sponsors used their policies and/or procedures for termination, AA submitted evidence that Project Sponsors followed their policies and/or procedures.
24 CFR §574.310

Requirements

Recommendations

14 Project Sponsors had policies and/or procedures for waitlists for TBRA, STRMU, and FBHA services. Policies and/or procedures specified how the waitlist was maintained and how waitlisted HOPWA-eligible households were prioritized. Project Sponsors must categorize waitlisted households by the service category they need (i.e., TBRA, STRMU, or FBHA, with additional STRMU subcategories for rent, mortgage, or utility costs), update their waitlists every three months at minimum, and include the dates households were added and removed. AA submitted evidence that Project Sponsors maintained waitlists (even if there were no waitlisted households) using a waitlist management tool.
HOPWA Rental Assistance Guidebook

Requirements

Recommendations

**DSHS HOPWA Program
Project Sponsor Review Tool**

15 AA had the following training certificates for at least one Project Sponsor staff member at each Project Sponsor: - CPD Financial Management Curriculum - HOPWA Oversight Training Curriculum - HOPWA Getting to Work Training Curriculum - HUD Lead-based Paint Visual Assessment Training Course Reviewer will list all Project Sponsor staff member names, agencies, and certificates under Observations. <i>HOPWA Formula Grant Operating Instructions; HOPWA Rental Assistance Guidebook</i>		
Recommendations	Requirements	

16 AA had Project Sponsors' Semi-Annual and Year-End Program Progress Reports (PPRs). AA Exhibit A expenditure data matched Project Sponsor PPR expenditure data. <i>24 CFR §574.520; 24 CFR §91.520</i>		
Recommendations	Requirements	

**DSHS HOPWA Program
Project Sponsor Review Tool**

17 AA submitted evidence of Project Sponsors' Quality Assurance Plans/Strategic Plans/Work Plans with a housing component. For example, plans could address:

- HUD HOPWA Outcome Objectives:
 1. Establish or maintain affordable and stable housing
 2. Reduce the risk of homelessness
 3. Improve access to health care and supportive services
- NHAS 2020 Target: Reduce the percentage of persons in HIV medical care who are homeless to no more than 5 percent.
- HUD HOPWA Outcome Measures for Access to Health Care and Supportive Services:
(HUD has set a national goal of at least 80 percent for each outcome measure below)
 1. Received housing case management (HOPWA Supportive Services or leveraged)
 2. Had a housing plan for maintaining or establishing stable on-going housing
 3. Had contact with a case manager per service plan schedule
 4. Had contact with a primary health care provider per service plan schedule
 5. Accessed or maintained medical insurance/assistance
 6. Accessed or maintained sources of income

DSHS Requirement; Understanding HOPWA Access to Care and Support Outcomes

Recommendations

Requirements

18 AA had three consecutive invoices for HOPWA expenditures from each Project Sponsor. AA reimbursed Project Sponsors in a timely manner.
24 CFR §200; HHSC Contract Uniform Terms and Conditions

Recommendations

Requirements

**DSHS HOPWA Program
Project Sponsor Review Tool**

19 If Project Sponsors paid \$600.00 or more in rent to an owner under TBRA, STRMU, or PHP, AA submitted evidence of Project Sponsors filing IRS Form 1099. The evidence did not intentionally or unintentionally indicate that the client was living with HIV or receiving services from an agency that provides HIV-related services. <i>HOPWA Grantee Oversight Resource Guide</i>		
Recommendations	Requirements	

Form M: Budget Worksheet (Or Project Sponsor's preferred form)	?
If applicable, present and complete without error messages	
Form N: Housing Plan (Or Project Sponsor's preferred form)	?
Present and complete without error messages	
Needs, subneeds, goals, and tasks reasonably related to services the household received	
Tasks were SMART, prioritized, and assigned to someone with a target date	
Tasks received updates	
Possibility of questioned costs?	
Case Notes	?
Recorded case notes throughout the enrollment period	
Possibility of questioned costs?	
Interim Recertifications	
Form O: Interim Recertification Worksheet and Required Attachments (If applicable)	?
If applicable, present and complete without error messages	
Attached applicable documentation of the change in circumstances	
Documentation supported description of the change in circumstances	
Attached applicable program forms for the change in circumstances	
Confirmed that the household still met program eligibility requirements	
Signed and dated by client	
Possibility of questioned costs?	
Supporting Documentation	
Check Request Vouchers	?
Present and complete	
Requested amounts corresponded with TBRA, STRMU, STSH, TSH, and/or PHP forms	
Possibility of questioned costs?	
Leases, mortgages, utility bills, ledgers, etc. paid for (Documentation must be current and predate service dates)	?
Present and complete	
Corresponded with service forms and check request vouchers	
Possibility of questioned costs?	
Owner IRS Form W-9(s)	?
If applicable, present and complete	
W-9(s) for all owners that received rent under TBRA, STRMU, STSH, TSH, and/or PHP	
W-9(s) information corresponded with check request vouchers for rent	
VAWA Written Request for Documentation, Documentation, and/or Emergency Transfer Form (If applicable)	?
If Project Sponsor requested documentation of survivor status, written request present and complete	
If Project Sponsor requested documentation, survivor provided permissible documentation	
If survivor requested and qualified for emergency transfer, Emergency Transfer Form present and complete	
Outcome Data and Program Disenrollment	
Form P: Service Outcome Assessment and Program Disenrollment Worksheet	?
Present and complete without error messages	
Start and end dates for each service fell within the annual eligibility start and end dates	
Recorded service outcome data for each type of service the household received	
If household disenrolled from the program, recorded disenrollment date and reason	
Signed and dated by case manager	