

Get the Facts: HOPWA and COVID-19 Response



Guide to Plan for and Implement Remote/Virtual HOPWA Program Initial, Interim, and Annual Assessments

HOPWA grantees and project sponsors may conduct initial, interim, and annual assessments remotely, via conference call, phone, or email. In fact, much of the process associated with completing an interim or annual recertification can be done by mail. In most cases, you have likely been providing case management services or checked-in with assisted households using some form of a non-face-to-face method, so the process of working with assisted households remotely is not new.

Grantees utilizing the HIV and income waiver flexibilities can allow for self-certification of income and other credible information to verify HIV status, though note that source documentation must be acquired within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19.

Grantees utilizing this waiver and/or who allow for working with assisted households remotely must also update current HOPWA program policies and procedures. And, no; there is no requirement to update your entire HOPWA Policy and Procedure Manual or Operations Guide, so programs only need to develop and include an addendum to their current manual detailing these changes.

To assist in thinking broadly about policy and procedures changes that may be needed, the following guiding questions and tips will help you determine the updates needed to plan for and implementing remote methods.

Remote Methods Policy and Procedure Manual Topics and Guiding Questions

Include a description of the policy change itself

- What is driving this policy change?
- What are the applicable effective dates of this change?

Describe the role of HOPWA program staff pertaining to those working with assisted households remotely.

- Do staff need any special equipment or training?
- Do households need any special equipment or training?
- How will program staff plan for working with assisted households remotely?

Include detail about required/preferred remote methods

- Will all initial certifications/intakes be conducted via virtual case conferencing or face-to-face (if safe) or are there exceptions? What methods will be allowed for interim or annual certifications? What about regular check-ins or case management annual assessments?
- Is there a preferred order for remote interactions? Who will decide the acceptable methods? When will the other acceptable methods be allowed?
- Are hard signatures on documents required? Are electronic signatures allowed? Are verbal releases of information allowed?
- What upfront and follow-up work can be done via email? What upfront and follow-up work can be done via regular mail? Will the program send a stamped pre-addressed envelope with any forms, releases, or other mailed documents that need returning?

Include details regarding any required documentation and any preferred order for documenting eligibility

- What documentation will the program accept for HIV status?
- What documentation will the program accept for verification of income for all household members?
- How will this documentation be obtained?
- If self-certification for either was accepted, how and when will actual documentation be received?
- What will occur if source documentation of HIV and/or income cannot be acquired within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19?

Include details regarding allowable costs (hardware, software, and program staff)

- Does the program have computers, tablets, or cell phones to conduct remote assessments and check-ins? Do any of these devices need a data plan or Wi-Fi connection?
- Will the program allow a household to borrow those devices if needed, and how will those devices be provided and returned?
- If applicable, what software programs will be used for virtual case-conferencing (Zoom, FaceTime, etc.)?
- If devices, software, and other costs are used across multiple funding sources and different HOPWA activities, how will the program allocate and document pro-rated costs?

Describe HOPWA Program confidentiality requirements pertaining to virtual assessments

- How will the program staff protect client confidentiality during any remote interactions? Do remote case conferencing sessions need to take place in software that requires a password to enter? Do Wi-Fi networks used need to be password protected?
- If emailing documentation, does any attachment need to be password protected? Does the program's email address meet confidentiality requirements?
- Once receiving any electronic documentation, will documentation be saved electronically, or will it be printed (and all electronic documentation deleted)?
- What hardware and software requirements (and associated costs) are needed to ensure confidentiality?

Describe how HOPWA program staff will communicate with households about policy and procedures changes due to adopting virtual interaction methods.

- How will Grantees and Project Sponsors communicate remote methods policy and procedure changes to households? Do household program information materials need to be updated?

Remote Assessments - Quick Tips and Helpful Hints

Plan for what households will need to know about the process regarding remote assessment and/or check-in methods or required documentation:

Pre-Assessment:

- Decide what, if any, type of remote method will be conducted
- Decide if the program will require more than one staff person
- If using a virtual method, inquire about a household's access to and fluency in using hardware and software needed, especially if live-virtual (such as does the client know how to log into a password-protected Wi-Fi or data plan, live-virtual tool, etc.)
- Identify if this fluency will or will not change the type of remote interaction planned
- Provide information about any documentation required, such as HIV status for at least one household member and income/asset documentation for all household members
- Discuss with the household the amount of time that should be set aside for conducting a remote assessment
- Inquire about who else may be present during the virtual assessment
- Explain the program's responsibility and policies to protect confidentiality

During the Assessment:

- Take time to work out any technical issues
- Begin by reiterating confidentiality policies and procedures currently in place (such as a locked virtual room, who else may be present during an assessment)
- Take plenty of time to explain each part of the process, response to questions, to assure that the household understands why program staff are asking certain types of questions
- If using virtual case conferencing, try to view, if not capture via taking a screenshot, HIV and income documentation. If not possible, take notes outlining any required follow up for both program staff and the household as you go through the assessment

Post-Assessment:

- Remind the household of items that require follow up and indicate any required timeline and notification expectations
- Complete the required assessment forms and add them to the household file
- Complete any notes to file regarding documentation that may be missing and when it will be received
- Mail forms, releases of information, or other documents discussed during the assessment, especially those that require hard signatures (remember to include a self-addressed stamped envelope for the household to return these and other documents).
- Either save or dispose of any electronic documentation, as applicable

Remote Assessments - Quick Tips and Helpful Hints for Documenting HIV Status and Household Income/Assets

In practice, HOPWA programs should continue to collect appropriate source documentation for HIV status and household income whenever possible. When such source documentation is unavailable, the CPD waiver memorandum dated March 31, 2020 allows for grantees to rely on self-certification of income and other credible evidence to verify HIV status in hopes this flexibility allows for expediting HOPWA eligibility determination and delivery of needed housing and services during the COVID-19 pandemic. To use the waiver flexibility, grantees must provide notification in writing, either through mail or e-mail, to the CPD Director of the HUD Field Office serving its jurisdiction no less than two days before the grantee anticipates using the waiver flexibility.

Virtual case conferencing may be used to meet with applicants and currently assisted households. During case conferencing a household could show source documentation verifying both income and HIV status. Program staff, if able, could take a 'screenshot' of the source documentation and print for the assisted household's file, provided the printed copies are clear and legible. Once printed and added to the household's file, obtaining copies directly from an outside source is not needed. If screenshots and printing are not possible, program staff can also make a note to the file documenting the information viewed on the source documents while seeking file documentation.

When seeking documentation for the file, a program can seek materials directly from the source or allow an applicant or assisted household to take photos of source documentation and email/text the photos to program staff. If using this method, do not forget about confidentiality as it pertains to email and texting. If sending copies of source documentation is not possible, program staff can send applicants and assisted households with a self-addressed stamped envelope to send source documents for the program to copy and return, or applicants/assisted households or program staff may request from a source outside the household, income verification and/or HIV verification be mailed directly to the HOPWA program itself (such as an Infectious Disease doctor faxing HIV status to the HOPWA Program office).

As a reminder, if utilizing the waiver flexibility allowing for other credible information of HIV status, there are several ways a person could provide “credible information on HIV status.” Some examples include the household knowing information such as:

- HIV medications
- Doctors in the area who treat HIV
- Viral suppression
- Their own status and HIV medical history

Other, non-client specific, examples of “credible information on HIV status” might include:

- A referral received from another HIV-specific agency with knowledge of the person’s HIV status
- Case management staff working in the same agency who has already worked with the client and knows them to be HIV+.

This type of other credible information is not self-certification but could be a form of third-party written or oral depending upon how the information was relayed to program staff.

For self-certification of income, remember to ask about possible income types and describe and provide information about what is and is not counted in annual income so that applicants and assisted households can accurately self-certify all income and asset sources. Some examples of topics/questions include:

- Describe the difference between gross and net income
- Describe and provide information about income deductions Ask about deductions, if any, does the household believe comes out of any income source?
- Ask how often does the household receive the income source?
- Ask if the household believes the income source to continue for the time being? Are there any known changes to the income source for the time being?
- Ask if these income sources are deposited into a checking or savings account? Or another type of asset?

Resources

[March 31, 2020 - Availability of Waivers of CPD Grant Programs and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19](#)

[May 22, 2020 - Additional Waivers for CPD Grant Programs to Prevent COVID-19 Spread and Mitigate COVID-19 Economic Impacts](#)