Policies & Procedures: Promoting Program Excellence

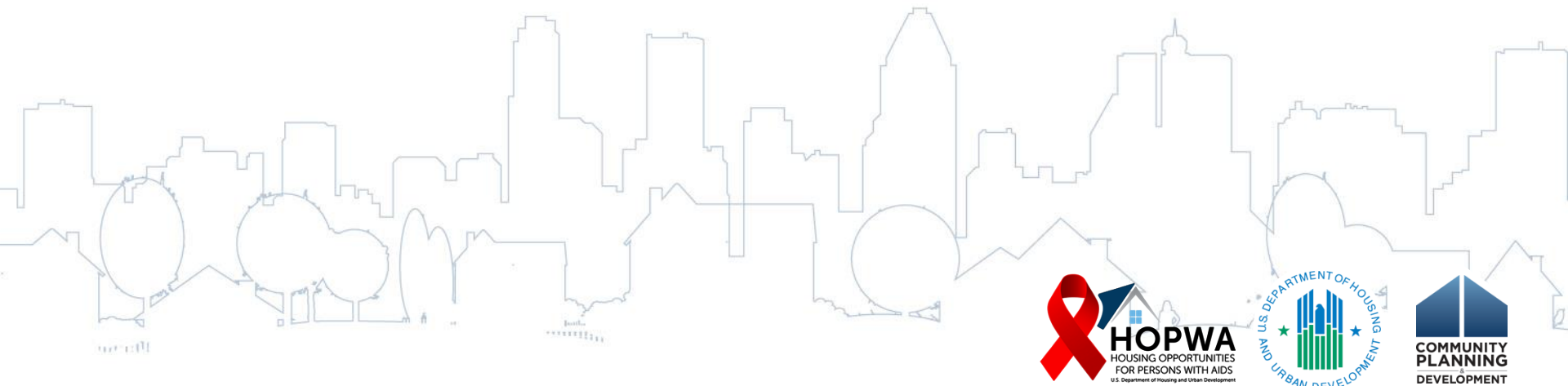National HOPWA Institute 2017
Tampa, FL

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:

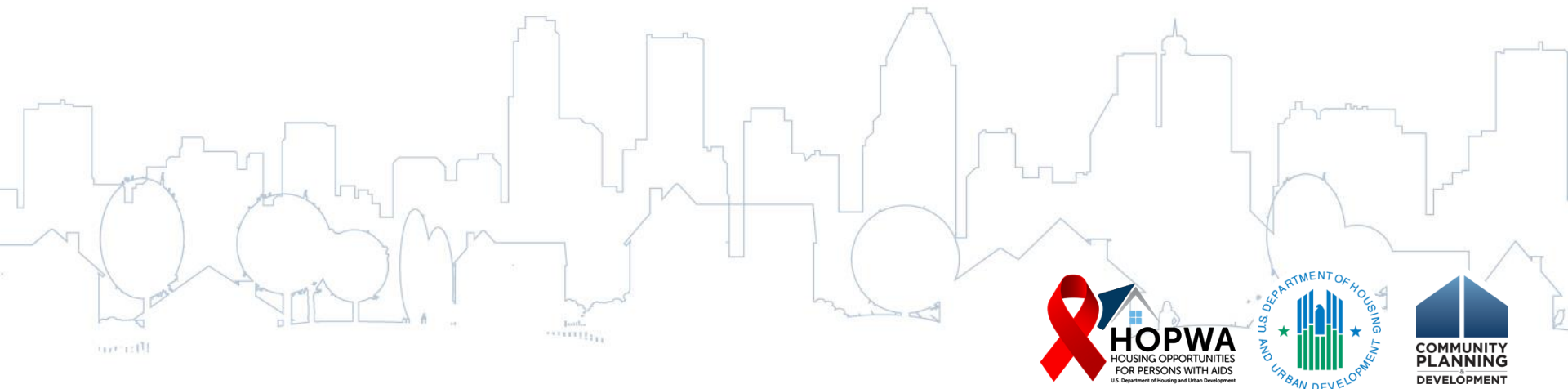"Housing's Role in Ending the HIV Epidemic"

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

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

TOPICS

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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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HOPWA HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS
U.S. Department of Housing and Urban Development

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

COMMUNITY PLANNING & DEVELOPMENT

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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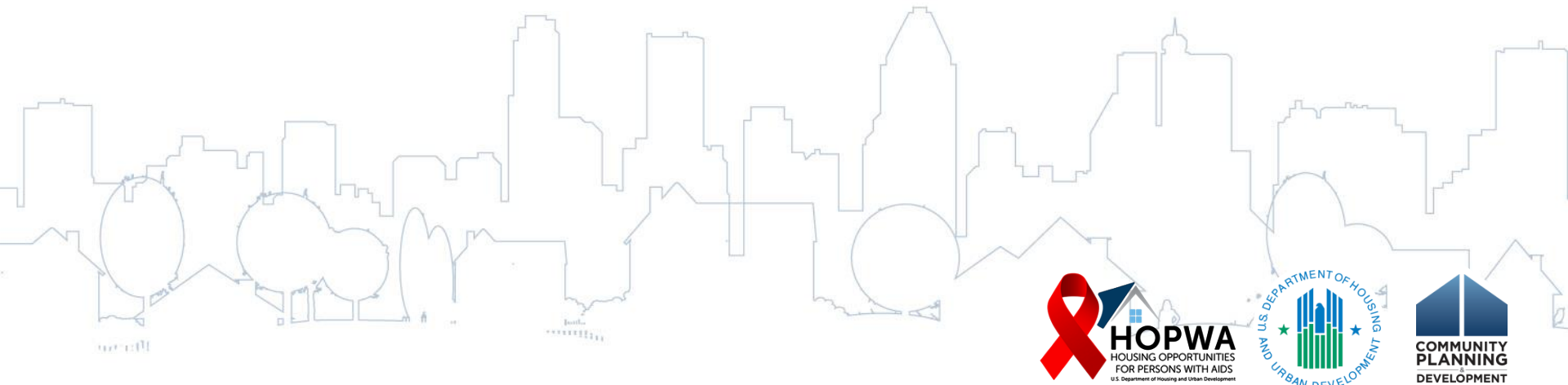- ❑ Care and Feeding of Your P&P

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

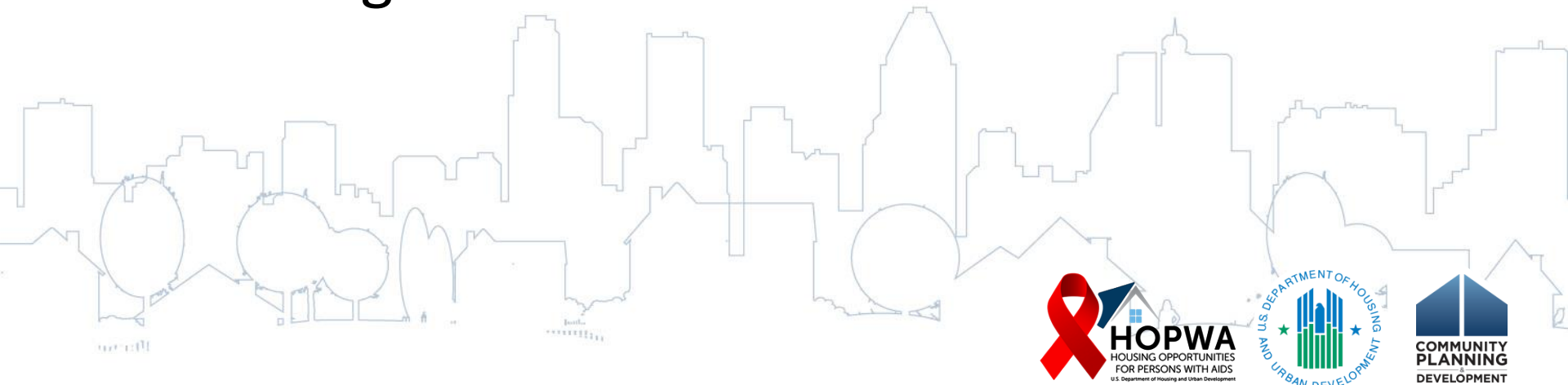- How privacy breaches will be handled

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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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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

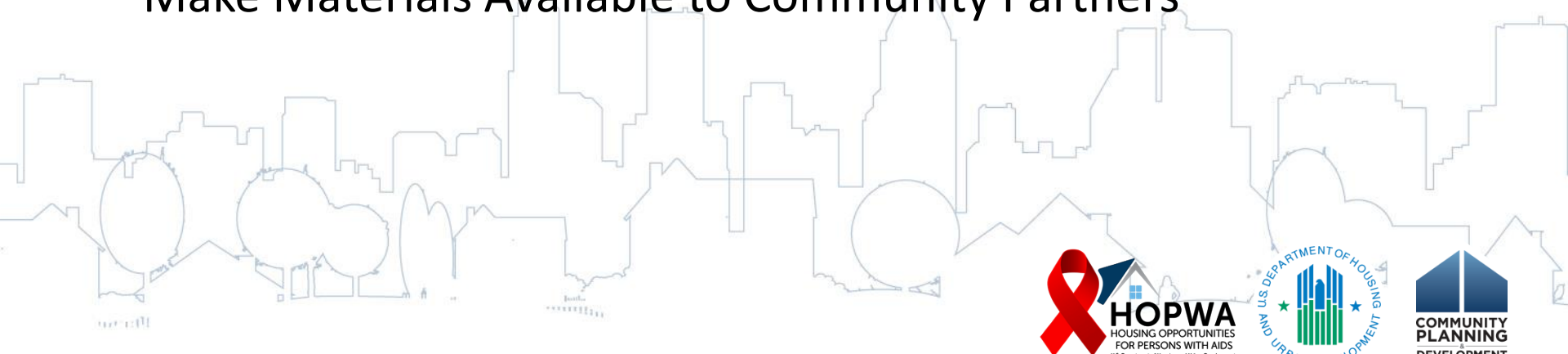State of Texas HOPWA Page: https://www.dshs.texas.gov/hivstd/hopwa/

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
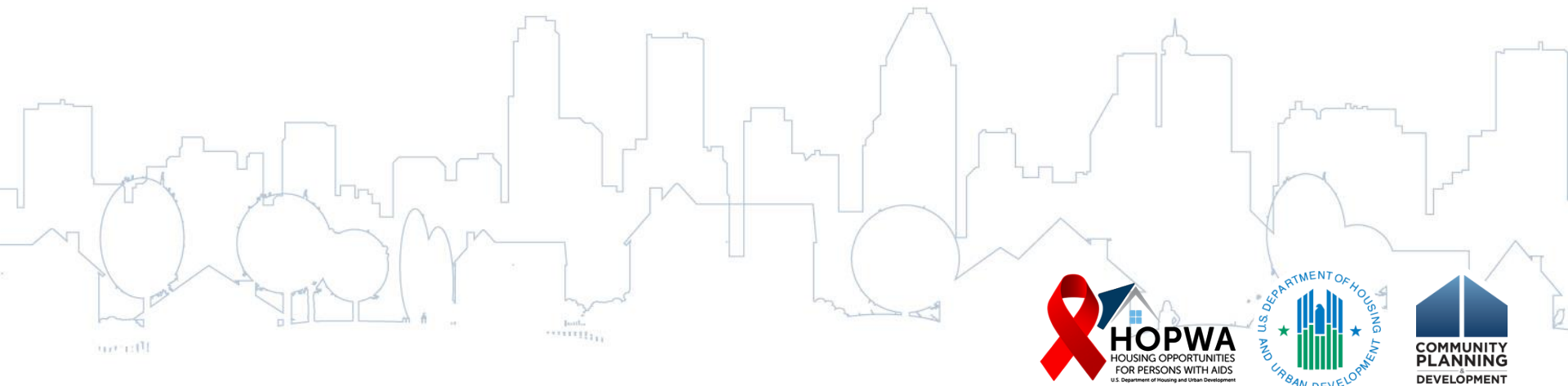- Fiscal, Quality Assurance, and Monitoring

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?