

# Common HOPWA Elements Monitoring Checklist

In the Guide, pages 52-76

This document summarizes key monitoring questions that are common to all HOPWA projects. Grantees may wish to use this list as a guide, and add additional, more specific, questions to develop their monitoring tools. Each monitoring question references pages in the HOPWA Grantee Oversight Resource Guide that provide additional information.



Additional information & resources can be found here:  
<https://www.hudexchange.info/resource/1025/hopwa-program-administration-toolkit>

HOPWA Grantee Oversight Resource Guide  
<https://www.hudexchange.info/resource/1003/hopwa-grantee-oversight-resource-guide>

## **Eligibility and Household Documentation—In the Guide, pages 57-59**

### **Do the participant files reviewed contain the required documentation to verify program eligibility and household composition?**

- Review for basic eligibility criteria, including:
  - » HIV/AIDS verification
  - » Household income limit that is at or below 80% of the Area Median Income
  - » Intake forms or application documenting household composition
- Review for original documentation that is signed and dated, with income verification no more than 90 days old

## **Housing Assessments/Plans—In the Guide, pages 59-61**

### **Do project sponsors conduct participant housing needs assessments (intake procedures, housing case management or other efforts), which serve to direct the type of housing assistance provided from HOPWA or other sources?**

- Review participant files for completed and dated assessments which thoroughly evaluate participants' needs and barriers to housing stability
- Verify that participant goals are tracked and assessments are regularly updated
- Verify that written policies and procedures articulate assessment standards

## **Ensuring Confidentiality—In the Guide, pages 61-64**

### **Has the sponsor established a written confidentiality policy and does the sponsor consistently follow the policy?**

- Review participant files for current signed and dated releases of information
- Verify that agency correspondence, checks, and company letterhead do not inadvertently identify the HIV status of participants
- Review the sponsor's written confidentiality policies and procedures pertaining to:
  - » Data collection and storage (physical and electronic)
  - » Annual reporting
  - » Consent process for releasing information
  - » Protocols for responding to confidentiality breaches

## **Terminations & Due Process—In the Guide, pages 64-65**

### **Does the sponsor follow HUD requirements for the termination of participants from HOPWA assistance or services?**

- Review agency policies and procedures to ensure that termination procedures meet regulatory minimum standards
- Verify that HOPWA participants are informed of this due process at the outset of receiving HOPWA assistance
- If the HOPWA-eligible member of a household has passed away, verify that the sponsor has provided the surviving household members with a written policy outlining HUD requirements

- regarding continued assistance
- When a HOPWA-eligible person is terminated from assistance, review his or her file to verify that he or she was provided due process that met HUD's minimum standards and followed the agency's policies and procedures

## **Conflict of Interest—In the Guide, pages 66-67**

### **Does the sponsor have a written conflict of interest policy governing employees, officers, or agents engaged in the award and administration of contracts supported by grant funds, in compliance with HOPWA regulations?**

- Review the sponsor's written conflict of interest policy for:
  - » Language prohibiting the solicitation of gifts
  - » Language prohibiting decision makers from benefiting from the program
  - » Procedures for informing parties of the policy

## **Faith-Based Organizations—In the Guide, pages 68-70**

### **Are faith-based organizations provided equal access to HOPWA resources? If a sponsor or sub-recipient is primarily a religious organization, are HOPWA activities clearly separated from and free of religious influences of the organization?**

- Verify that outreach and marketing materials are free from using religious preferences as criteria and do not indicate who will or will not be served

- Verify that services provided are free from religious education or instruction, and review policies, program applications, and participant files for documentation of equal access, regardless of religious beliefs

**Fair Housing & Equal Opportunity—In the Guide, pages 70-72**

**Are the project sponsor’s policies, procedures, and program implementation in compliance with Fair Housing and affirmative outreach requirements?**

- Verify that program policies do not inquire as to the nature of the disability or screen out persons with physical, cognitive, and behavioral disabilities
- Verify and review the sponsor’s written policies and procedures outlining how requests for accommodations are addressed

**Record Retention—In the Guide, page 73**

**Does the sponsor have a plan in place to maintain program and related financial records for a four-year period after the end of the grant agreement?**

- Verify that the sponsor has a written policy regarding maintaining program/financial records for four years after the specific grant has ended
- Request and review older participant and financial records

**Accuracy and Timeliness of Reports—In the Guide, pages 73-75**

**Are the sponsor’s performance reports accurate and completed in a timely manner?**

- Verify that sponsor reporting is consistent with information provided in connection with invoices (e.g. TBRA, STRMU, Supportive Services)
- Verify accuracy of the reports by cross-checking with actual performance and program records
- Review for any missing or incomplete information