POLICY and PROCEDURE 0210: Contracting and Monitoring
HOMELESSNESS PROGRAMS OFFICE
HOUSING AND COMMUNITY DEVELOPMENT DIVISION
UTAH DEPARTMENT OF WORKFORCE SERVICES

0210.1. POLICY STATEMENT: This document provides policy on contracting, sub-contracting, and monitoring of programs funded or provided through the Homelessness Programs Office (HPO) of the Housing and Community Development (HCD) Division.

The HPO is the administrator of many diverse programs, with diverse sources. Each of these sources have unique laws, rules, requirements and guidelines. Contract awards and monitoring systems will reflect this.

HPO will develop information, expertise and resources to increase compliance levels and quality of programs, while focusing on increased impact. Monitoring activities will appraise levels of compliance, needs for technical assistance, and for continual improvement.

0210.2. Hierarchy: The Division Director and Program Managers are responsible to see that laws, rules, requirements, and regulations are incorporated into practice by the respective Grant/Funding Program Specialists during the contracting and monitoring process.

It is the policy of HCD to account for and follow this hierarchy of documented regulations in regard to contracting and monitoring:

1. Federal Statutes
2. Program Requirements
   (Regulations and Guidance)
3. Administrative Requirements
   (OMB Circulars and Federal Agency Administrative Regulations)
4. State Laws and Regulations
5. Prime Award Terms and Conditions
6. Sub-Award Terms and Conditions

0210.3 Electronic and Paper Systems:

0210.3.1. Records will be maintained in hard copy files and electronic files. HPO Program Manager will define where documents will be retained. General records will always be recorded in the HCD shared 'I' drive. Hard copies are retained as back up in case of electronic system failure and may be disposed of by recycling after seven (7) years.

0210.3.2. Generally, funding contracts and, where available, applications and management, will be done through appropriate online software systems; currently WebGrants Systems 1 and 3 (Dulles Technology Partners).

0210.4. Application Information, Workshops, Submission and Award: As appropriate, the HPO Program Manager will provide information, workshops, electronic instruction, and/or webinars to assist potential applicants to understand what is expected when applying for funding. Program Manager will schedule scoring panel trainings and facilitate application awards.

0210.4.1 Templates for applications for funding will be designed and/or revised as needed by Program Specialists and Program Managers, accounting for changes to federal, state and program requirements. The applications will be posted in a timely manner in WebGrants, and/or if appropriate, online.

0210.4.2. Applicants will register in the appropriate online software system and make application through that system unless there are extenuating circumstances and a waiver in writing is received by the Program Manager.

0210.4.3. Staff will review the online applications for completeness and eligibility. If an applicant needs assistance throughout the application process, they can contact HPO Staff, or find online resources provided by HPO, including worksheets and FAQ documents. For HPO purposes, all applicants will be responsible to submit complete and timely applications, there will be no opportunity for revisions, or extensions beyond the due date.

0210.4.4. Community members and Continuum of Care (CoC) representatives familiar with projects and programs may be invited to participate as a panel member to review applications and apply scoring criteria, upon completing a statement disclosing any possible conflict of interest. Decisions as to whether to fund applications, and if necessary, the terms of funding, will be made by this governing board.

0210.4.5. If a governing board will review the applications, a packet of information and analysis will be prepared by HPO staff for the governing board members making decisions about grants. This packet will be available to board members during a training for scoring for their review. HPO staff will be available at trainings to answer questions by the panel.

0210.4.6. After application review and scoring are complete, staff in each Program Area will execute the decisions of the board in a timely manner, following the steps outlined below. Program Managers will review the efficiency of this procedure annually, and update policies if necessary, based on the specifics of each program and funding opportunity.

0210.5. Identification of Funding Sources for Awards: HPO has structured Programs that provide funding to Agencies as Grantees or Sub-recipients to be more effective and is intended to strengthen alignment of requirements, resources, and monitoring. Pre-Award and Monitoring activities will be dependent on the program area funding identified for the contract.

0210.5.1 Homelessness Services Grant (HSG) This Program Area include the federal source - Emergency Solutions Grant (ESG, CFDA 14.231); and state sources of - Pamela Atkinson Homeless Trust Fund (PAHTF) and Critical Needs Housing (CNH) Match Amounts, which meet the requirements of ESG of a one-to-one dollar match, reducing burden on sub-recipients to identify matching funds.

0210.5.2 State Homelessness Funding (SHF) Program area includes PAHTF/CNH remaining amounts, state H2H One time & Ongoing funding, and state H2H Shelter Operations fund that requires a one-to-one dollar match.
0210.5.3 Temporary Assistance for Needy Families (TANF) Federal funding (CFDA 93.558) source that HPO uses to support Diversion projects across the state.
0210.5.4 Housing Opportunities for Persons With AIDS (HOPWA) Federal funding (CFDA 14.241) source provided by HUD dedicated to the housing needs of people living with HIV/AIDS.
0210.5.4 Homeless Shelter Mitigation Fund (HSMF) New state legislative funding that sources revenue from counties in the state not supporting an emergency shelter program, and provides funding for security measures to be provided at emergency shelter programs in counties that provide such services.
0210.5.5 Tenant Based Rental Assistance (TBRA) is provided on a limited basis in cooperation with State Olene Walker Housing Loan Fund.
0210.5.6 Utah Homeless Management Information System (UHMIS) HPO provides services as the HMIS Lead Agency, managing software and reporting requirements for HUD funded projects, supported through CoC grants. As the lead agency, HPO provides guidance, training and oversight of data entry for agency/sub-recipient reporting, and must provide monitoring of agencies who are required to report on services provided with funding they receive.

0210.6. Pre-Award Activity

0210.6.1. Risk Assessments: Pre-award risk assessments (PARA) of applicants for funding will be conducted, using the prescribed method of DWS.

0210.6.1.1. Program Managers will work with DWS finance office to determine which applicants will require the completion of a Pre-Award Risk Assessment.
0210.6.1.2. It is recognized that for certain funding, a particular score cannot prevent the award to a designated agency.
0210.6.1.3. All new funding sub-recipients or organizations will be assessed. Repeat applicants will be assessed each year that they submit applications, or as required by the program, or at their request. Before making awards, or as early as appropriate, staff will check that database to be sure that a Risk Assessment is in place and is current as defined in this document. If it is not, then an assessment will be conducted.
0210.6.1.4. Risk Assessments will be scored by DWS Fiscal Office, and the completed Risk Assessment results will be posted in a location available to division staff administering various programs; for example, in the division shared ‘I’ drive, Google Drive or attached in the online software application’s Organization Database.
0210.6.1.5. Scoring on this Risk Assessment MAY influence the Division’s intent to execute a sub-recipient agreement or contract with the applicant, and, if an agreement or contract is executed, the level of technical assistance, level of monitoring, and monitoring schedule.

0210.6.2 Environmental Review: Funding to Sub-recipients supported through the HSG Program Area will receive an annual request to complete an Environmental Review certification, for the purposes of meeting ESG requirements, ensuring the project being funded will not have an adverse impact on the environment with construction or extensive remodeling.

0210.6.2.1 Completion of certification will happen as identified sub-recipients complete the process electronically through WebGrants software. They will complete the steps in the software, print a certification, sign it, and upload it.

0210.6.2.2 Once the agency has uploaded the signed certification and uploaded to the software, the HPO Program Specialist assigned will download it and approve it. The approved document will be provided back to the agency though WebGrants.

0210.6.3 Development of Scope of Work (SOW) and Budget: HPO Staff will identify Budget and Scope of Work documentation to be sent to agencies for acceptance and approval, or negotiations, for each Project Type and Program Site. SOW may be used for all funding sources, Budgets will be by Program Areas.

0210.6.3.1 Budgets will be set using the DWS object code structure and Categories I, II, and III, as well as allowable activity guidelines from the specific funding sources.

0210.6.3.2 HPO Staff will identify Performance Measures that align with the type of project being funded, and targets submitted with the application. Documentation of any previous performance will be submitted with the application, and through reports pulled from HMIS. These pieces will be included in the Scope of Work (SOW) along with specific information required by the program or unique information included in the application.

0210.6.4 Identification of Agency Required Match: HPO staff, upon identification of the application funding source referenced in paragraph 0210.5, will send request to agencies who will receive funding sources requiring match documentation, through email using the H2H-ES Match Form, fillable PDF with specific expectation of a return date. The Match form HPO received from the agency will become part of the contract documentation.

0210.7. Execution of Contracts

0210.7.1. As the contract pieces are gathered, detailed review of all attachments will provide the Program Specialist assigned to the grant and geographical area the working knowledge of agency specific program goals and targets. This assists in clear communication and agreement of data tracked previously and the targets identified for the contract period, and also informs monitoring scope.

0210.7.2 The Program Specialist will deliver the contract to the Program Manager, with the routing documentation HCD requires to track the progress of review, acceptance and recording at each identified office at HCD, DWS, and State Finance. At this point, the agency will receive the contract pieces they have already been involved in developing and accepting, for signature. Once the agency returns the contract to HCD, the HCD Division Director will receive it as the designated signatory for the department on HCD contracts. The fully executed agreement is then scanned and uploaded to the organization's account in WebGrants, and in the HCD Shared Drive Contracts Folder, and the sub-recipient will be notified of the contract execution and availability in Webgrants.

0210.8. Management of Awards

0210.8.1. A HPO Program Specialist and Grant Manager, who is expected to understand specific issues pertaining to each funding program will be assigned to each contract. Sub-recipients will have a specific HPO Program Specialist assigned as primary contact for program and contract management duties based on specific grant knowledge and geographical area (Balance of State CoC, Moutainlands CoC, and Salt Lake CoC). The Grant Manager is the staff member assuming duties of executing the contract and processing reimbursements for all sub-recipients.

0210.8.2. The Program Specialists and the Grant Manager will work together throughout the contract year to communicate to agencies the expectations of the funding sources. This includes, but is not limited to, ensuring the program is implemented with fidelity and aligned with CoC priorities, accurate fiscal records and documentation are submitted with reimbursements, a minimum of quarterly drawdowns are received and approved at HPO, and recording documentation of technical assistance and monitoring activities. Project or program training opportunities will be provided and/or attended by the Program Specialists and the Grant Manager.

0210.9. Reimbursements

0210.9.1. Sub-recipients will submit reimbursement claims at least quarterly, with all required invoices, receipts, documentation and paperwork through the Webgrants software system.

0210.9.2. The Grant Manager or Program Specialist will review the reimbursement request within 5 business days of submission through Webgrants to determine if activities and expenditures submitted through the claim are within the Scope of Work and eligible for reimbursement.

0210.9.3. The claim may be put into Correcting Status through WebGrants, and returned to the sub-recipient electronically if corrections are needed, or may be put into Approved Status, and sent on to State Finance/Accounting to process the payment.

0210.10. Monitoring

HPO will follow the monitoring policies of DWS. Frequency and focus is based on the PARA results, where sub-recipients are scored as low-risk, medium-risk, or high-risk, and may take into consideration previous monitoring results or reports completed by HPO or another program within HCD.

0210.10.1. Monitoring for HPO sub-recipient programs will be completed during the contract year.

0210.10.3. Monitoring may be Onsite, Desktop or strictly Financial, depending on PARA score assigned to sub-recipient. Monitoring may be performed at any time, with or without notice.

0210.10.4 Sub-awardees generally will be informed of the intent of on-site and desktop monitoring visits. Visits should be scheduled with at least ten (10) day notice, and written confirmation will be sent by HPO. Submission of sub-recipient project/program Policy and

Procedure, Accounting or financial recordkeeping policies, and Employee Handbook will be requested before visit is scheduled so staff can review information to prepare any modification to monitoring documents, if applicable. Sub-recipients will also be notified what information and materials will need to be made available to the HPO Program Specialist during the visit.
0210.10.5. Sub-awardees will be expected to make executive staff, case management staff, and/or data input and reporting staff available during the monitoring visit, to discuss project administration, application and recording.
0210.10.6 Sub-recipients will receive a preliminary report within 15 days of the monitoring visit, containing any noted gaps in project administration, or exceptional practices, and may be given the opportunity to correct small errors found through monitoring before official reporting is produced by HPO.
0210.10.7. Results of the on-site monitoring visit including findings will be delivered in writing within 30 days of monitoring visits. Sub-awardees will have an opportunity to respond, and/or provide any corrections, or actions already taken to address items identified during the monitoring visit. Sub-recipients will have 30 days of receipt before the monitoring report becomes official.
0210.10.8 Sub-recipients will be given a deadline to develop and implement a corrective action plan to resolve findings. Wherever practicable, tools and technical assistance will be made available to the agency to aid in improvement and capacity building.
0210.10.9. HPO will retain documentation of monitoring procedures and modifications for the same length of time as for monitoring checklists and other monitoring records.

Monitoring visits may consist of, but not limited to:

0210.10.1.1 Evaluation of sub-recipient policy as it pertains to state program policy, or if applicable, federal funding program policy

0210.10.1.2 Project expectations of services to clients vs. services provided, gaps that may exist, and review of community relations and support

0210.10.1.3 Review of practice vs. policies, board formation and makeup, frequency of review and updates of policies

0210.10.1.4 Client files for documentation of intake forms, eligibility, and identification of homelessness status, and/or other programmatic requirements

0210.10.1.5 Staff files for timesheet reconciliations, employee training and certification, if applicable, records of trainings, and understanding of project expectations

0210.10.1.6 Financial backup documentation for claims submitted through Webgrants for program/project expenditures

0210.10.2. Monitoring tools, including checklists, matrixes, and discussions may be uniquely tailored for each contract, dependent on which funding sources are received from HPO, and the program expectations detailed in the SOW. Forms are provided to sub-recipients prior to actual monitoring meetings for their information and review. Current HPO tools attached in appendices, consist of:

0210.10.2.1 ESG/PAHTF/CNH (Unified Funding) monitoring matrix – last updated 2016, and is being reviewed for updates at this time.

0210.10.2.2 ESG/PAHTF/CNH (Unified Funding) Checklist – last updated 2016, and is being reviewed for updates at this time.
0210.10.2.3 TANF monitoring matrix and checklist –
0210.10.2.4 HOPWA monitoring matrix
0210.10.2.5 CoC monitoring template provided by HUD that includes Housing First indicators
0210.10.2.6 UHMIS monitoring checklist, approved by the UHMIS Steering Committee

0210.10.3. Monitoring may be Onsite, Desktop or strictly Financial, depending on PARA score assigned to sub-recipient. Monitoring may be performed at any time, with or without notice.
0210.10.4 Sub-awardees generally will be informed of the intent of on-site and desktop monitoring visits. Visits should be scheduled with at least ten (10) day notice, and written confirmation will be sent by HPO. Submission of sub-recipient project/program Policy and Procedure, Accounting or financial recordkeeping policies, and Employee Handbook will be requested before visit is scheduled so staff can review information to prepare any modification to monitoring documents, if applicable. Sub-recipients will also be notified what information and materials will need to be made available to the HPO Program Specialist during the visit.
0210.10.5. Sub-awardees will be expected to make executive staff, case management staff, and/or data input and reporting staff available during the monitoring visit, to discuss project administration, application and recording.
0210.10.6 Sub-recipients will receive a preliminary report within 15 days of the monitoring visit, containing any noted gaps in project administration, or exceptional practices, and may be given the opportunity to correct small errors found through monitoring before official reporting is produced by HPO.
0210.10.7. Results of the on-site monitoring visit including findings will be delivered in writing within 30 days of monitoring visits. Sub-awardees will have an opportunity to respond, and/or provide any corrections, or actions already taken to address items identified during the monitoring visit. Sub-recipients will have 30 days of receipt before the monitoring report becomes official.
0210.10.8 Sub-recipients will be given a deadline to develop and implement a corrective action plan to resolve findings. Wherever practicable, tools and technical assistance will be made available to the agency to aid in improvement and capacity building.
0210.10.9. HPO will retain documentation of monitoring procedures and modifications for the same length of time as for monitoring checklists and other monitoring records.

0210.11. HPO Policies and Procedures

0200.12.1. Program specialists are responsible for maintaining and updating Program Policies and Procedures and for training their sub-recipients.
0200.12.2 HPO Program Policies and Procedures will be maintained in a central location, currently the HCD Shared Drive.

Appendix A: ESG/PAHTF/CNH (Unified Funding) monitoring matrix

Appendix B: ESG/PAHTF/CNH (Unified Funding) checklist
Appendix C: TANF monitoring checklist
Appendix D: HOPWA monitoring matrix
Appendix E: CoC monitoring template provided by HUD that includes Housing First indicators
Appendix F: UHMIS monitoring checklist, approved by the UHMIS Steering Committee

Appendix A

Appendix B

DWS-ASD 504
Rev. 04/2015

Appendix C
State of Utah
Department of Workforce Services

PROGRAM MONITORING CHECKLIST

INSTRUCTIONS: Review the required documentation and complete the checklist at least annually for each federal award and information sharing agreement. Notify the grantee of the results and recommendations. Failure to comply with recommendations may result in termination of the award.

Organization name: ______________________________

Program name: ______________________________

Contract number: ______________________________

Funding amount: ______________________________

Contract start date: ______________________________

Contract end date: ______________________________

Monitoring date: ______________________________

Monitored by: ______________________________

Monitoring Attendees: ______________________________

Risk level: ☐ **Low** ☐ **Medium** ☐ **High**

Determination:

☐ **Meets grant requirements** ☐ **Action Required to Become Compliant**

Requirements	Yes / No / NA	Comments
Program Summary		

1.	Does the organization provide the funded services agreed upon? • See proposal		
1a.	Program description		
1b.	Population served and marketing		
2.	Is the organization addressing the outcomes described in the proposal? • What? • How tracked? • How measured?		
3.	Does the organization have a system for addressing customer grievances?		
4.	Is the facility adequate to deliver the contracted service?		
5.	Does the organization collaborate with the local DWS office regarding services available to families?		
6.	Does the organization subcontract out a portion of the program? If so, describe the monitoring process and provide documents.		
Staffing			
7.	Does the organization have the required licenses and	N/A	

	certifications to administer the program?		
8.	Do the employee files contain the signed DWS Code of Conduct agreement?		
9.	Do the employee files contain the DWS Non-disclosure agreement?		
10.	Do the employees meet the Criminal Background Check requirements?		
11.	Are employee files kept in a secure location?		
Grant Administration (Desk audit)			
12.	Did the program administrator and fiscal manager attend the in-person grant orientation?		
13.	Does the organization submit required reports in a timely manner? • Quarterly Outcomes • Annual Reports		
14.	Does the organization have current documentation of required insurance?		
15.	Are current/past invoices submitted timely, expenditures documented, and the program follows the budget?		
16.	Does the organization enter client information into the HMIS system?		
Required Action Items			

The following item(s) are needed in order to successfully meet the grant requirements:	
ORGANIZATION must submit a response with a corrective action plan by Failure to meet grant requirements may result in termination of the award.	
Notes:	
Program Response (Optional):	

Appendix D

HOUSING & COMMUNITY DEVELOPMENT DIVISION

Homelessness Programs Office (HPO)

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA) PROGRAM

PROGRAM PERFORMANCE SUMMARY AND REGULATORY COMPLIANCE CHECKLIST

Monitoring Conducted:

Subrecipient	
Subrecipient Address:	

Updated June 2018

Phone #		E-mail:	
Project Name:		Project Address:	
HOPWA Funding Year:		Contract Period:	

HOPWA Categories

- ❑ Housing Acquisition
- ❑ Housing Construction
- ❑ Housing Rehabilitation, Conversion, Repairs
- ❑ Housing Leasing
- ❑ Project or tenant-based rental assistance
- ❑ Short-term rental, utility, mortgage assistance
- ❑ Housing Information Services
- ❑ Resource Identification
- ❑ Housing Operations
- ❑ Technical Assistance
- ❑ Supportive Services
- ❑ Administrative Expenses (cannot exceed 7% of amount requested) No Admin

HOPWA Funding Allocation for this Category:

Responsible Staff:

PART A

PROGRAM PERFORMANCE SUMMARY

The purpose of establishing _Performance Indicators_ is to determine that the project has met or is meeting its objectives by evaluating the program activities and summarizing the community/social benefits of the project. To meet standards, HOPWA Subrecipients must contract and expend 100% of award and/or complete the project within 2 years of HUD approval.

PERFORMANCE INDICATORS (24 CFR 574.520, 574.530, 574.540)

1.	**Project Award**		
	Project award as a percent of total funds awarded in the fiscal year. (Definition: HOPWA funds awarded the project, divided by total HOPWA funds allocated for the category)		
2.	**The Subrecipient:**		
	Expended 100% of award and/or completed the project within 2 years of HUD approval of funding		
3.	Major project objective (Example: Provide HIV/AIDS clients and their families with short-term rental and utility assistance and provide appropriate supportive services.)		
	Proposed number of units/clients and their families to be served. (Definition: units/clients and their families are the performance objectives outlined in the scope of work of the HOPWA contract)		
	Total number of units/clients and their families served in the contract year		
	Percent of performance objectives achieved. (Definition: Total number of units/clients and their families served divided by the number proposed in the HOPWA contract)		
4.	**Number of "concerns" identified during annual site monitoring visit.** (Definition: A matter which, if not properly addressed, can become a finding and result in sanctions)		

5. **Number of "findings" identified during annual site monitoring visit.** (Definition: A finding is a violation of law or regulation which can result in sanction)		
PART B **PROJECT FILE RECORDS REVIEW**		
In preparation for the monitoring visit, a desk audit of subrecipients material contained in the project file will be conducted prior to visiting the agency/project site. The review will ensure subrecipients activities were eligible, in compliance with HOPWA regulations.		
Reimbursement claim review incorporates desk audit each time reimbursement payment was submitted.		
HOPWA ELIGIBILITY (24 CFR 574.300, 574.310, 574.320, 574.330, 574.340)		
1. Is there an eligibility determination form on file for the project and is eligibility consistent with contract description of the project?		
2. Are appropriate supportive services provided for any HOPWA assisted housing?		
3. Do the eligible housing activities meet the general standards such as housing quality standards, minimum use period, etc.?		
4. Are the additional standards for rental assistance being met, such as maximum subsidy?		
5. Are the additional standards for short-term supported housing being met such as the 21-week rule?		
PERFORMANCE AND EXPENDITURES (24 CFR 574.450, 574.605)		
1. Are performance objectives, performance standards, reporting requirements and timelines clearly established for the project?		
2. Do reports indicate that the agency is meeting contract performance objectives?		

3. Do reports indicate that the clients are low-income (80% of area median income or below)?		
4. Are HOPWA funds being spent at the planned rate?		
5. Are expenditures supported by invoices, purchase orders, etc.?		
6. Are Accounts Payable files properly set up, and is backup information easily accessible?		
Comments:		
REPORTING REQUIREMENTS (24 CFR 574.450, 574.650, CFR Part 85; OMB Circular A-110)		
1. Is the agency submitting required reports on time?		
2. Are program, performance, and demographic reports & invoices usually correct?		
Comments:		
INSURANCE (24 CFR Part 85, OMB Circular A-100)		
1. Has the agency submitted an original Certificate of Insurance showing proper coverage and listing the City as "additional insured"?		
Comments:		
AUDIT (24 CFR 85, OMB Circular A-133, OMB A-128, OMB A-87, OMB A-21)		
1. Did the agency receive $50,000 or more from the City the past two consecutive years? If yes, has the agency submitted the required audit to the City?		

2. Did the audit contain recommendations, concerns or findings? If yes, is there evidence on file that the recommendations have been implemented and the concerns and or findings cleared?		
3. Did the Agency qualify for an A-133 due to other Federal Funding received? It does not matter if the funds were for the HOPWA Program or not. (The $300,000 threshold is aggregate of all funding the agency receives) Per CFR Part 84 Grants and Agreements with Non-Profit Organizations, and OMB A-133, audits are to be conducted for the agency as a whole.		
Comments:		
PART C **ON-SITE INTERVIEW AND VERIFICATION WITH AGENCY PERSONNEL**		
MANAGEMENT (24 CFR 574.605, OMB Circular A-110, A-122, A-133)		
1. Does the agency have a regular means of monitoring project performance and activities?		
Comments:		
BUDGETARY CONTROLS (OMB Circular A-110, A-102, 24 CFR 574.605) **FINANCE AND RECORD KEEPING (OMB Circular A-133, A-128 and 24 CFR 574.605)**		
1. Does the agency have a regular means of monitoring program revenue, program income, and expenditures?		
2. Are project funds accounted for separately within the accounting system?		
3. Does the agency keep separate financial and program records for each project?		

4. Does the agency track and report program income?		
5. Does the agency keep records for the time period required (four years from the date of audit, or if findings, four years from the date the findings are resolved)?		
6. Do the project files contain copies of the grant application, a determination of eligibility, contract, and any amendments, reimbursements requests, backup documentation for each invoice, copies of approved invoices, and warrants and correspondence with the City?		
Comments:		
INTERNAL CONTROLS (OMB Circular A-87, A-122)		
1. Are duties and responsibilities separated so that no one employee has sole control over cash receipts, disbursements, reconciliation of bank accounts, receivables, etc.?		
2. Is the payroll prepared by personnel who are neither responsible for the time-keeping function nor detailed to deliver paychecks or cash to employees?		
3. Are written procedures maintained covering the recording of transactions, an accounting manual, and a chart of accounts?		
4. Does the Subrecipients maintain a policy manual covering:		
a. Approval authority for financial transactions?		
b. Guidelines for controlling expenditures, such as purchasing requirements and travel authorizations?		
c. Procedures governing the maintenance of accounting record?		
INVENTORY CONTROLS (OMB Circular A-110, A-122, A-21, A-133, 24 CFR 574.605)		

1. Does the agency have a control system with adequate safeguards to prevent loss, damage or theft of property of non-expendable items with a purchase price of over $1,000?		
2. Does the agency maintain property records that include: description, serial number, source of property, who holds title, actual cost of the property, and federal share of that cost, location, use and condition of the property?		
3. Has the agency purchased any items over $1,000 with project funds?		
4. If the agency has purchased equipment with project funds, is the equipment appropriately inventoried and tagged as HOPWA property?		
Comments:		
PERSONNEL (24 CFR 574.605, OMB Circular A-110)		
1. Does the agency have written personnel policies governing:		
2. Hiring, promotion, and termination?		
3. Salaries and fringe benefits?		
4. Annual leave, vacation, and holidays?		
5. Performance evaluations?		
6. Do personnel records include a current job description for each project employee?		
7. Is there an organization chart which sets forth actual lines of responsibility?		
Comments:		
GOVERNING BODY (OMB A-87)		
1. Is the board currently constituted in accordance with agency bylaws?		
2. Do the board and subcommittees meet in accordance with the agency's bylaws?		
3. Are minutes of board meetings taken and distributed?		

Comments:		
AMERICANS WITH DISABILITIES ACT (24 CFR 8.6; Section 504 Title VIII)		
1. Has the agency documented a Section 504 self-evaluation?		
2. If the agency employs 15 persons or more, are the self-evaluation results on file and made available?		
3. If the agency fully in compliance with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act?		
4. If no, does the agency have a Corrective Action Plan indicating steps it will take to make the program and services accessible?		
SEPARATION OF CHURCH AND STATE (24 CFR 574.300 (c)		
1. Are there are religious activities during the time the HOPWA program is operating?		
2. Is there any evidence of staff attempting to proselytize HOPWA clients?		
Comments: **VERIFIABLE**		

NOTES:

CORRECTIVE ACTIONS REQUIRED:

HOPWA Monitoring Conducted by:

Homelessness Programs Office

HOPWA PROGRAM

Monitoring Guide

(Agency) (HOPWA Contract No.) (Contract Period)

HOPWA Staff:

Conducted on:

A. Program Policy & Procedures		**Answers**
1. Copy of executed contracts #		
2. Does sub-grantee have an Operating Policies and Procedures Manual?		
3. Housing Authority of County of Salt Lake Policy and Procedure Manuals for HOPWA grant		
4. Does the sub-grantee have a clearly defined & understandable **Eligibility policy**, including provisions for ineligible clients? Discuss.		
5. Does the sub-grantee have a **Terminations policy,** including due process and an appeals procedure? Describe.		
6. Does the sub-grantee have a **Drug Free Workplace** policy? Describe		
7. Are procedures in place to protect client confidentiality? Discuss		
8. Are procedures in place for adequate case management?		
B. Program Financial - Reimbursement		**Answers**
1. Is the sub-grantee submitting reimbursement request at least quarterly? Is rate of draw-down consistent with end of contract expenditures?		

2. Resident rent payment calculation		
3. What process is in place to ensure that all funds have been issued directly to a **third party** and not directly to clients?		
C. Program Eligibility Documentation		**Answers**
1. Medical documentation on HIV Status		
2. Documentation on the number of household members		
3. Eligibility for uncompensated health care payments		
4. Verification of household income		
5. Is there a system for spot checking to ensure documentation is complete – signatures?		
6. Is a separate file maintained for each client served? Discuss		
D. Program Confidentiality Plan		**Answers**
1. Are client files maintained in locked cabinets or rooms? Who has the keys? Where are keys kept?		
2. Is access to client records restricted only to agency staff directly involved in program operations?		
3. Are fiscal records secured in a limited access area?		
E. Program Internal Control Process		**Answers**
1. **Program time-limit tracking process**		
2. Is there a master spreadsheet to maintain cumulative months served per client or other applicable record keeping database?		
3. Are there internal controls in place, such as **segregation** of duties to effectively reduce the chance to conceal errors or commit fraud?		
4. How often are there staff meetings to discuss client progress?		
5. Is the Supervisor signature on employee time sheets?		
6. Do employee time-sheets indicate actual times, & not percentages? If employee is being paid from more than one source, is this indicated on time- sheet?		
F. Collaboration Process		**Answers**
1. Does the agency link with other programs in the community?		
2. Does the agency participate in **HMIS?**		

G. Conflicts of Interest		**Answers**
1. In there a process in place that prohibits employees, officers, consultants, or other agents of the sub-grantee from participating in the decision making process related to procurement if that person, or that person's family, partner, or any organizations employing any of the above has a direct financial interest or benefit from that procurement? Where written? Signature required?		
2. In there a process in place that prohibits any employee, officer, consultant, or other agent of the sub-grantee from accepting any gift, gratuity, favors, or anything of monetary value from a contractor, consultant or other entity whose services and/or products are procured by the sub-recipient? Where written? Signature required?		
3. Are employees, officers and agents of the sub-grantee required to adhere to Code of Conduct relating to abuse, neglect, maltreatment and exploitation? Signed form?		
G. Other Federal Requirements		**Answers**
***Non-discrimination and Equal Opportunity*:**		
1. Does the sub-grantee make its facilities and services available to all persons with handicaps, and without regard to race, color, religion, sex, age, familial status or national origin?		
Limits on Funding to Primarily Religious Organizations:		
1. Does the sub-grantee discriminate against any employee or applicant for employment, or limit employment or give preference in employment on the basis of religion?		
2. Does the sub-grantee give preference to any person obtaining shelter or other services offered by the sub-recipient on the basis of religion?		
3. Does the sub-grantee require program participants to attend religious services or meetings as a condition of receiving other social services at the sub-recipient, such as shelter or a meal?		

Client Files Only		**Answers**
Please indicate actual number of households served by TBRA (Tenant Based Rental Assistance)		
Is there a medical documentation in the client file verifying HIV status?		

Please specify the HOPWA Activities: TBRA and how **much money** and **how many** months of financial assistance have been paid out? Is this amount easily identifiable in file?		
Are the Applicant & Contractor Signatures and Dates completed?		
Is there documentation of the number of members in a household?		
If Eligibility is based on Income, did the applicant meet the requirements? (Gross Income)		
If Eligibility is based on Income, is there documentation in the case file and does it cover the full month prior to application date?		
Is there a new application process if client has **returned later** for more benefits (there has been a break in service) and does the case note document the compelling need for more service?		
For rental assistance payments, does the client file contain a signed **current lease** with client's name, Land Lord (LL) name, address? ✓ Lease date: ✓ Address: ✓ Client signature: ✓ LL signature:		
For rental assistance payments, does the client file contain a notice **of lease termination or eviction** from the landlord with client name, LL name, address, amount owed, and date?		
For utility assistance payments, does the client file contain a **notice of termination** of service from the utility provider with client name, address? Does lease indicate termination if utilities not paid?		
Is it verifiable that all funds have been issued directly to a third party and not to client?		
Are expenditures in accordance with the approved HOPWA eligible services as per scope of work?		
CASE NOTES/NARRATION: Do Case Notes document: 1) Why client was funded? a) One-time crisis? (not on-going situation) b) "Probable sustainability" description 2) How was eligibility determined?		

a) Categorical b) Income 3) Services provided: Type/Amount/Date(s) 4) Do files notes narrate Exit Information?		
Is there indication that this household was referred to other supportive services?		

NOTES:

CORRECTIVE ACTIONS REQUIRED:

HOPWA Monitoring Conducted by:

Appendix E

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

Appendix F

Utah Homelessness Management Information System (Utah HMIS)

Data Security Monitoring Guide

AGENCY____

CONTACT PERSONS /TITLES/CONTACT INFORMATION____

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Updated June 2018

Utah HMIS Monitor____

Date of Monitoring____

A.	**Agreements and Authorization**	**Y, N, N/A**	**Comments**
1.	The agency has completed a UHMIS Agency Agreement and has provided a copy to the Utah HMIS.		
2.	The agency has completed a Utah HMIS End User Agreement for each authorized system user and has provided a copy to the Utah HMIS.		
3.	Is there a list of active authorized/certified HMIS users? (All staff entering/viewing HMIS data in the HMIS system must be appropriately trained and have and individual user license with a unique user name and password.)		
4.	The agency has reviewed the policies and procedures manual (August 2011 Version)		
B.	**Data Protection**	**Y, N, N/A**	**Comments**
1.	The agency collects, enters and extracts only HMIS data that are relevant to the delivery of homeless services		
2.	The agency limits access to the Utah HMIS database to its own employees specifically for: a. verifying eligibility for service b. entering records into the system for service provided.		

3.	As staff members leave the employ of the agency, their HMIS user accounts are immediately inactivated or changes to accommodate a new user. The agency must contact the Utah HMIS System Administrator to make these changes. (Written Procedures in place for turnover?)		
B.	**Data Protection, con't.**	**Y, N, N/A**	**Comments**
4.	Is the UHMIS privacy policy posted in a common area viewable by those receiving services?		
5.	Signed "Client Consent for Data Collection" and "Client Consent for Data Release" forms from clients are kept on file. (The agency has a Quality Assurance Plan in place and monthly process that verifies that consents were obtained)		
6.	Data extracted from the database is stored in a secure location within the local area network. If data is transmitted outside of the local area network, it is properly protected via encryption or by adding a file-level password.		
7.	Do computers used to access the HMIS have a locking screen saver? (Terminals that access the HMIS system must have locking screen savers and are password protected. Terminals must be locked when left unattended.)		

8.	Terminals that access the HMIS system must have virus protection with automatic updates and individual or network firewalls.		
C.	**HMIS Best Practices**	**Y, N, N/A**	**Comments**
1.	How often is client information entered into HMIS? How is this documented? The agency accurately enters all the required HMIS data elements, as specified in the Agency Agreement, within 5 working days		
2.	Entry and Exit Dates are accurately reflected in HMIS (The agency has a Quality Assurance Plan in place and a process for verifying that entry and exit dates in administrative files match HMIS)		
3.	Do HMIS users have access to adequate computer technology and tools, such as internet access, printers, data analysis software, etc.?		
4.	Any other technical assistance?		