



# Housing Opportunities for or Persons with AIDS (HOPWA)

**CARES Act and HUD CPD Waiver Flexibilities**  
**HOPWA Monitoring and Reporting**  
**The Cloudburst Group**



# Introductions - Presenters

## **The Cloudburst Group**

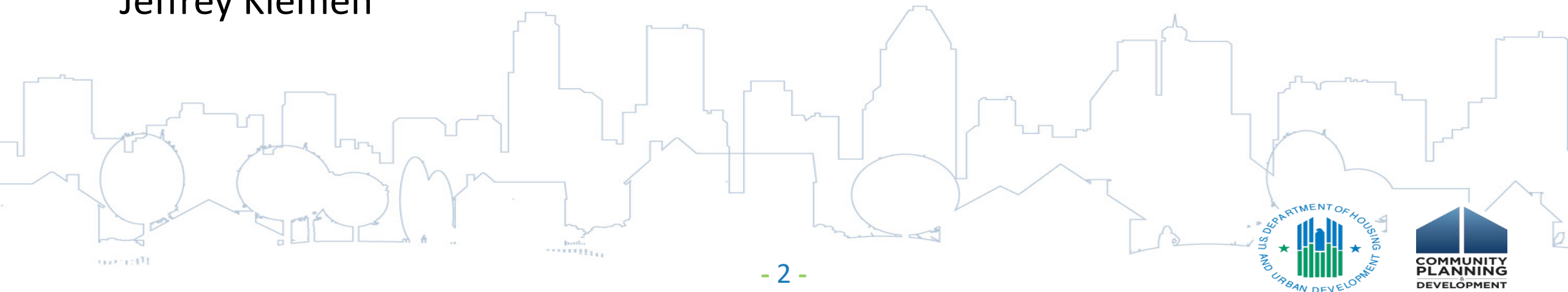
Steven Ellis

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## **HUD's Office of HIV Housing (OHH)**

Claire Donze

Jeffrey Kiemen



# Agenda

## Section 1: HOPWA CARES Act Funding

- STRMU time limits
- Administrative cost caps

## Section 2: Regular and HOPWA CARES Act Funding

- HUD CPD Waiver Flexibilities

## Section 3: HOPWA CARES Act Reporting Requirements

# Monitoring Considerations

## *General overview*

Generally, *how* grantees monitor project sponsors will be the same (i.e., remote monitoring vs. onsite monitoring).

What you *look for* in terms of client and financial documentation itself may be different as a result of changes brought about by the CARES Act and flexibilities outlined in HUD CPD (HOPWA) waiver notices.

HOPWA Oversight Resource Guide

<https://www.hudexchange.info/resource/1003/hopwa-grantee-oversight-resource-guide/>

HUD CPD Monitoring Handbook (Chapter 10)

[https://www.hud.gov/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2)

# Section 1: HOPWA CARES Act

- STRMU time limits
- Administrative cost caps



# Monitoring Considerations

## *STRMU time limits*

### **Item:**

The CARES Act allows for providing STRMU assistance for up to 24 months from 21-weeks in any 52-week period

### **Key Elements:**

- Ensure clients files indicate a good faith effort to achieve permanent (stable) housing
- Ensure staff time and activity delivery costs are not duplicated across regular and HOPWA CARES Act funds
- Ensure HOPWA program policies and procedures are updated to reflect how CARES Act STRMU will be provided

### **Recommendations:**

NOW – begin planning for how assisted households will be transitioned from extended STRMU to another type of housing assistance and/or no housing assistance (as applicable)

# Monitoring Considerations

## *Administration costs caps*

### **Item:**

The CARES Act increased the administrative cost caps

- Grantees: up to 6% of total allocation
- Project sponsors: up to 10% of the subaward

### **Key Elements:**

- Ensure only eligible administrative costs are charged to the administration budget line

### **Recommendations:**

- Remind project sponsors that the increased administrative caps applies to *only* CARES Act funds

## Section 2:

# Regular and HOPWA CARES Act funding – HUD CPD Waivers

- Self-certification of income and Credible information about HIV Status
- Property standards
- Rent standards
- Short-term Supported Housing Time Limits
  - STRMU
  - Short-term emergency housing (hotel/motel)



# Section 2: Regular and HOPWA CARES Act funding – HUD CPD Waivers

	A	B	C	D	E	F
1	<b>Project Sponsor Name</b>					
2						
3	<u>Client ID</u>	<u>Date of Application of Waiver</u>	<u>Documentation of Waiver in File?</u>	<u>Date of Completion of Waiver</u>	<u>Documentation of Completion of Waiver in the File?</u>	<u>Special Notes?</u>
4						
5						
6						
7						
8						

Self Cert of Income and HIV

Property Standards

Rent Standards

ST Time Limits

STRMU Time Limits



# Monitoring Considerations

## *Self-certification of income*

### **Item:**

This waiver allowed for immediate use of self-certification of income rather than source documentation – waiver expiration and deadline for obtaining source documentation is 9/30/21.

### **Key elements:**

- Ensure that client files contain a copy of the applicable waiver and completed self-certification forms

### **Recommendation:**

- NOW – start attempting to collect source documentation of income
- IF source documentation still is not available, households should update self-certification of income forms

# Monitoring Considerations

## *Credible information about HIV status*

### **Item:**

This waiver allowed for the immediate use of credible information, including self-certification, to document HIV status – waiver expiration and deadline for obtaining source documentation is 9/30/21.

### **Key elements:**

- Ensure that client files contain a copy of the applicable waiver and a completed self-certification of HIV status, documentation of referral from another HIV provider, or clear notes to file that meet HUD OHH guidance

### **Recommendation:**

- NOW – start attempting to collect source documentation of HIV status

# Monitoring Considerations

## *Property standards – Housing quality standards/habitability inspections*

### **Item:**

This waiver only applies to initial inspections, which includes conducting a lead-based paint visual assessment, as applicable – expiration 9/30/21. This includes needing to conduct onsite inspections by 12/31/21 for all units in which an initial inspection was conducted remotely.

### **Key elements:**

- Ensure that client files contain a copy of the applicable waiver
- Ensure that client files contain completed Housing Quality Standards or HOPWA habitability inspection form clearly indicating a virtual inspection was completed – including a lead-based paint visual assessment, if applicable.
- Ensure that client files contain a completed onsite Housing Quality Standards or HOPWA habitability inspection.
- Ensure HOPWA program policies and procedures are updated to reflect conducting initial inspections remotely, using technology including detail about conducting physical inspections for units in which an initial inspection was conducted remotely.

### **Recommendation:**

NOW – start developing a schedule and begin completing onsite inspections for all units where an *initial* inspection was conducted using virtual methods

- Remind project sponsors this waiver only applies to initial inspections

# Monitoring Considerations

## *Rent standards*

### **Item:**

This waiver allowed for Grantees a third option when establishing rent standards – i.e., based on rent reasonableness – expiration 12/31/21

### **Key elements:**

- Ensure the client files include documentation of the rent standard waiver
- Ensure the client files include completed rent reasonableness checklists/certifications

### **Recommendation:**

- Make sure you know to which units this waiver applies
- NOW – begin planning for how rent standards will be adjusted

# Monitoring Considerations

## *STRMU and short-term emergency housing time limits*

### **Item:**

For STRMU, this waiver extended the eligibly period from 21-weeks in a 52-week period to 52 weeks in a 52-week period

For short-term emergency housing (hotel/motel), this waiver extended the time limit from 60-days to 120-days

- Expiration 12/31/21

# Monitoring Considerations

## *STRMU and short-term emergency housing time limits, continued*

### **Key elements:**

- Ensure the client files include documentation of the waiver
- Ensure client files include documentation of good faith efforts to assist household in achieving permanent housing
- Ensure client files include documentation granting STRMU extensions, as applicable
- Ensure HOPWA program policies include written details outlining efforts to regularly assess household needs and a process for granting extensions

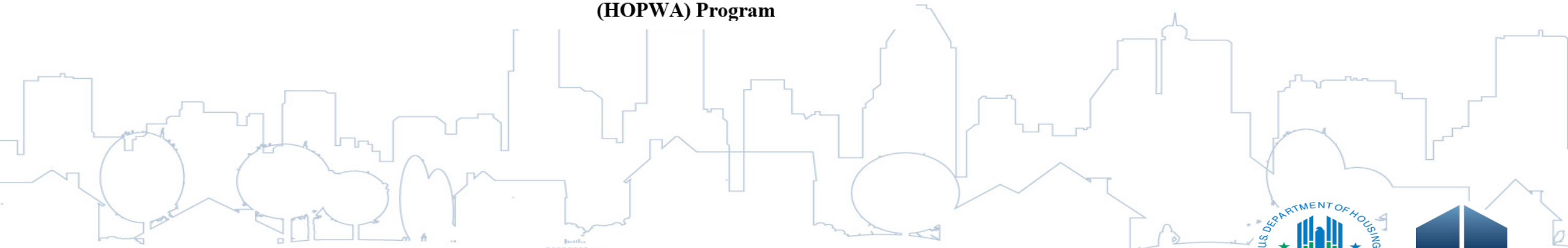
### **Recommendation:**

- For households receiving STRMU or short-term emergency housing, begin planning for transitioning household to permanent (stable) housing

# Section 3: HOPWA CARES Reporting



## Housing Opportunities for Persons With AIDS (HOPWA) Program





# HOPWA CARES Reporting *Reminders*

- HOPWA program performance reporting includes the HUD-40110-D (CAPER) for Formula Grantees or the HUD-40110-C (APR) for Competitive Grantees
- All reports are due within 90 days of the end of the appropriate operating year
- Guidance will be different depending on whether you are a formula or competitive grantee

# HOPWA CARES Reporting

## *CAPER - Formula Grantees*



### **Housing Opportunities for Persons With AIDS (HOPWA) Program**

### **Consolidated Annual Performance and Evaluation Report (CAPER) Measuring Performance Outcomes**

form HUD-40110-D (Expiration Date: 11/30/2023)

OMB Approval No. 2506-0133



# HOPWA CARES Reporting

## *Formula Grantees*

- HOPWA CARES (CV) reporting follows the same operating year as other HOPWA dollars
- All HOPWA data (households and expenditures) from any allocation, including HOPWA-CV, are combined into one HOPWA CAPER
- Do not separate households and expenditures within any of the tables/cells
- Must try to de-duplicate households within HOPWA activities

# HOPWA CARES Reporting

## Formula Grantees - Example

A HOPWA program assisted 75 households with regular formula HOPWA funds spending \$275,000 and assisted 50 households with HOPWA-CV formula funds spending \$75,000; however, of 125 households served, 25 are duplicative – only report on 100 households

### 1. HOPWA Performance Planned Goal and Actual Outputs

HOPWA Performance Planned Goal and Actual		[1] Output: Households				[2] Output: Funding	
		HOPWA Assistance		Leveraged Households		HOPWA Funds	
		a.	b.	c.	d.	e.	f.
		Goal	Actual	Goal	Actual	HOPWA Budget	HOPWA Actual
HOPWA Housing Subsidy Assistance		[1] Output: Households				[2] Output: Funding	
4.	Short-Term Rent, Mortgage and Utility Assistance	100	100			\$400,000	\$350,000

# HOPWA CARES Reporting

## *APR - Competitive Grantees*



### **Housing Opportunities for Persons With AIDS (HOPWA) Program**

### **Annual Progress Report (APR) Measuring Performance Outcomes**

form HUD-40110-C (Expiration Date: 11/30/2023)  
OMB Approval No. 2506-0133



# HOPWA CARES Reporting

## *APR - Competitive Grantees*

HOPWA CARES (C-CV) reporting follows a different operating year as other HOPWA-C dollars

HOPWA-C and HOPWA-C-CV operating years are based upon when the grant agreement is signed, not a program's operating year

- See Box 14 of your C-CV Grant Agreement or in IDIS under “View” then “View Grant Term”

Each HOPWA-C-CV grant must be reported separately from all other HOPWA funds (other C or C-CV). Grantees were allocated HOPWA C-CV funding based on the number of regular HOPWA-C grants. For example:

- A grantee funded with two HOPWA-C grants would have been allocated two HOPWA C-CV awards. As for reporting, this means in a 12-month period...
  - **Two regular HOPWA-C APR due to HUD and**
  - **Two HOPWA-C-CV APRs**
  - **Total due = 4 APRs due to HUD in a 12-month period**

# HOPWA CARES Reporting

## *APR- Competitive Grantees*

The same form (HOPWA-40110-C APR) is used and there are different (and less!) reporting requirements for HOPWA-C-CV

- Not all charts are required, and
- Only parts of charts are required (i.e., number of assisted households, demographics, etc.)

Financials **are not required** for HOPWA-C-CV APR reporting - financial information will be collected via IDIS

- Ensure all necessary IDIS draws are completed **before** submitting the APR – paying special attention to the Actual Cost Incurred Date.

# HOPWA CARES Reporting

## APR - Competitive Grantees

HOPWA CARES Act Only APR reporting summary of requirements

<u>Required Part</u>	<u>Required Sections/Charts</u>
<b>Part 1</b>	All
<b>Part 2</b>	All
<b>Part 3A</b>	Section 1 - Chart b, row 5 only Section 2 – Chart b and c only
<b>Part 3C</b>	Chart 1, Column 1 only
<b>Part 4</b>	Section 1, Columns 2 and 3 Section 2, Column 2 Section 3, Chart 1a Row 1b, Section 3, Chart 1b Column 1 Section 3, Chart 1c
<b>Part 5A</b>	Chart 1 (Project Sponsor Org Information) only



# HOPWA CARES Reporting

## APR - Competitive Grantees: Example

### Part 3: Summary Overview of Grant Activities

#### C. Performance and Expenditure Information

Report the total number of households that received HOPWA assistance and the amount of HOPWA funds expended for each program activity provided. In each activity section, the total Row must contain an **unduplicated** total number of households assisted. An adjustment for duplication Row is provided in each section to ensure that the total is correct.

*Note: See definition section for more information about Adjustment for Duplication.*

*Data Check: Data in this section is summarized from all project sponsors PART 5A-E submissions and therefore should match the combined total for those submissions. HOPWA housing subsidy assistance, supportive services, and housing placement activities are measured in households served while housing development activities are measured in units developed.*

#### 1. Performance and Expenditure Information by Activity Type

HOPWA Housing Subsidy Assistance		[1] Outputs: Number of Households	[2] Outputs: Amount of HOPWA Funds Expended
1.	Tenant-Based Rental Assistance		
2a.	<b>Permanent Housing Facilities:</b> Received Operating Subsidies/Leased units		
2b.	<b>Transitional/Short-term Facilities:</b> Received Operating Subsidies/Leased units		
3a.	<b>Permanent Housing Facilities:</b> Capital Development Projects placed in service during the operating year		
3b.	<b>Transitional/Short-term Facilities:</b> Capital Development Projects placed in service during the operating year		
4.	Short-term Rent, Mortgage, and Utility Assistance		
5.	Permanent Housing Placement Services		
6.	Adjustment for duplication (subtract)		
7.	<b>TOTAL HOPWA Housing Subsidy Assistance (Column 1 equals sum of Rows 1-5 minus Row 6; Column 2 equals the sum of Rows 1-5)</b>		

# HOPWA CARES Reporting

## APR - Competitive Grantees: Example

### Section 1. Individuals

#### a. Total HOPWA eligible individuals\* receiving HOPWA Housing Subsidy Assistance

In Chart a., provide the total number of eligible (and unduplicated) **low-income individuals living with HIV/AIDS** who qualified their household to receive HOPWA housing subsidy assistance during the operating year. This total should include only the individual who qualified the household for HOPWA housing subsidy assistance but NOT all HIV positive individuals in the household.

Individuals Served with HOPWA Housing Subsidy Assistance	Total Number
Number of individuals with HIV/AIDS who qualified their household to receive HOPWA housing subsidy assistance	█

\*See definition section for clarification on HOPWA eligible individuals

#### b. Prior Living Situation

In chart b, Indicate the prior living arrangements for all the individuals reported in Chart a. In Row 1, report the total number of individuals who continued to receive HOPWA housing subsidy assistance from the prior operating year into this operating year. In Rows 2 through 17, indicate the prior living arrangements for all new HOPWA housing subsidy assistance recipients during the operating year.

**Data Check:** The total number of eligible individuals served in Row 18 equals the total number of individuals served through HOPWA housing subsidy assistance reported in Chart a above.

Category	Total HOPWA Eligible Individuals Receiving HOPWA Housing Subsidy Assistance
1. Continuing to receive HOPWA housing subsidy assistance from the prior operating year	█
<b>New Individuals who received HOPWA Housing Subsidy Assistance support during Operating Year</b>	
2. Place not meant for human habitation (such as a vehicle, abandoned building, bus/train/subway station/airport, or outside)	█
3. Emergency shelter (including hotel, motel, or campground paid for with emergency shelter voucher)	█
4. Transitional housing for homeless persons	█
5. Total number new individuals who received HOPWA Housing Subsidy Assistance with a Prior Living Situation that meets HUD definition of homelessness (Sum of Rows 2 – 4)	█
6. Permanent housing for formerly homeless persons (such as Shelter Plus Care, SHP, or SRO Mod Rehab)	█
7. Psychiatric hospital or other psychiatric facility	█
8. Substance abuse treatment facility or detox center	█
9. Hospital (non-psychiatric facility)	█
10. Foster care home or foster care group home	█
11. Jail, prison or juvenile detention facility	█

**A**

#### Author

Please enter number of HOPWA-eligible individuals that qualified the household for HOPWA in the operating year and entered from a prior living situation of homeless. Homeless situations are defined as:

1. Place not meant for human habitation (such as a vehicle, abandoned building, bus/train/subway station/airport, or outside)
2. Emergency shelter (including hotel, motel, or campground paid for with emergency shelter voucher)
3. Transitional housing for homeless persons

# HOPWA CARES Reporting

## *Reminders/Submission Process/Questions*

Formula grantees: Submit one, **combined** CAPER

Competitive Grantees: Submit different APRs

- Being mindful that the HOPWA-C-CV APR is an annotated version of the regular APR

Submission: Completed HOPWA reports should be submitted directly to your HUD CPD Field Office Representative, [HOPWA@hud.gov](mailto:HOPWA@hud.gov), and the Cloudburst Group

Questions: Email the Cloudburst Group HOPWA data validation team

# Contact Info and Resources

## Contact Information

[Heather.Rhoda@cloudburstgroup.com](mailto:Heather.Rhoda@cloudburstgroup.com)

[Steven.Ellis@cloudburstgroup.com](mailto:Steven.Ellis@cloudburstgroup.com)

## Resources

*We'd love to help – request Technical Assistance (TA)!*

- HUD is making additional TA available to grantees to support HOPWA/COVID-19 planning, program development, problem-solving. Those needing TA assistance in managing COVID-19-related program issues may submit an online request through the HUD Exchange at: <https://www.hudexchange.info/program-support/technical-assistance/>

*Submit a question to the HOPWA Ask-A-Question (AAQ) desk*

- Grantees/Sponsors may ask program, policy, and COVID-related questions through the HOPWA AAQ: [HOPWA Ask A Question \(AAQ\) Portal](#)