Housing Opportunities for Persons with AIDS (HOPWA)

HOPWA 101 Training
2009
Workshop Outline

SECTION I – PROGRAM PLANNING, RULES & REGULATIONS
1. Overview of the HOPWA Program
2. Funding
3. HOPWA and the Consolidated Planning Process
4. Integration with Other Community Planning Efforts
5. Client Eligibility
6. Eligible Activities
7. Calculating Benefits

SECTION II – PROGRAM MANAGEMENT & REPORTING
8. Annual Performance Reporting
9. Financial Management and Documentation
Part 1: HOPWA Overview

- Program Origin
- Statutory Purpose
- Strategic Objectives
- Current Use of HOPWA Funds
More than one million Americans are living with HIV.

- The Centers for Disease Control and Prevention estimate that approximately 56,300 persons in the US become infected each year (CDC, 2007).

The households affected by the disease are typically among the lowest income households.

In 1992, the National AIDS Commission reported that housing serves as a base from which to receive care.

- The lack of stable housing by persons with HIV/AIDS prevents their ability to participate in HIV care, resulting in devastating health consequences and contributing to increased mortality rates.
The Housing Opportunities for Persons with AIDS (HOPWA) program was created to address the housing needs of low-income individuals living with HIV/AIDS and their families.

- Administered by the Office of Community Planning and Development.
  - Headquarters, Office of HIV/AIDS Housing
  - HUD State and Local Field Offices
Statutory Purpose

“To provide states and localities with resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of persons with acquired immunodeficiency syndrome and families of such persons....” (42 U.S.C. 12901)
HOPWA Strategic Objectives

- **Promote Decent Affordable Housing**
  - Expand availability of and access to decent, affordable rental housing (i.e., outputs).

- **Strengthen Communities**
  - End chronic homelessness and move homeless families and individuals to permanent housing (i.e., outcomes)
  - Others: Ensure equal opportunity in housing; embrace high standards of ethics, management, and accountability; promote participation of faith-based and community organizations, etc.
HOPWA Strategic Goals: Outputs

Promote Decent Affordable Housing

The number of rental households and rental housing units assisted. **2009 targets:**

(a) HOPWA to assist at least 20,000 households in permanent housing efforts; and

(b) Support 38,000 households with reduced risks of homelessness in short-term or transitional housing efforts.
HUD Strategic Goals: Outcomes

Strengthen Communities

National HOPWA 2009 targets:

(a) at least 85% of HOPWA clients in permanent housing shown to be maintaining housing stability (to reach 90% by 2012); and

(b) at least 60% of clients in short-term or transitional housing shown to have reduced risks of homelessness (to reach 70% by 2012).
HOPWA Profiles of Results

Transparency on National Data & Information on each HOPWA grant program

See www.HUDHRE.info/HOPWA website

e.g. as follow from program year 2008 reports, from 99 of 121 formula programs involving $204 million expended and 44,030 households assisted, 3-31-09

Reports on status for timely use of funds, based on target for formula grants in ratio of 1.5 balance in hand to new allocation; or 3 year use of renewal/competitive funds.
Profiles of Housing Delivery

Formula Expenditures 08 / Type of Housing

- TBRA 39.9%
- STRMU 17.9%
- Facility units w. operating costs 22.7%
- TH/ST facilities Operations 8.7%
- PH facility developed & in service 1.9%
- PH Facilities Operations & leased units 8.7%
- TH/ST facility 0.2%
Profiles of Activity Costs

Formula Expenditures 08 by Activity

- **Housing Assistance**: 54.6%
- **Housing Development**: 5.4%
- **Housing Placement Assistance**: 5.6%
- **Supportive Services**: 26.7%
- **Administration and Management Services**: 7.8%
Part 2: Funding

- Overview
- Formula
- Competitive
- Technical Assistance
- Obligation & Expenditure Requirements
Funding Overview

Obligation of $310 million in FY09 HOPWA funds
(increase of $9.9 million; 3.3%)

- Allocation of funds:
  - 90% of funds are allocated by formula to eligible states and eligible metropolitan statistical areas (EMSAs).
  - 10% of funds are awarded through a competitive process.
  - Up to $1.485 million (FY09) for technical assistance, training, and oversight activities.
Formula Program: Key Definitions

- **Eligible Metropolitan Statistical Area (EMSA):** Metropolitan areas with a population greater than 500,000 and having more than 1,500 cumulative AIDS cases.
  - The largest city in the EMSA serves as the grant recipient and is responsible for identifying and implementing grant activities across the entire metropolitan area.

- **Eligible States:** More than 1,500 cumulative cases of AIDS (outside of eligible EMSAs).
Formula Program: Allocation of Funds

● 90% of annual funding is allocated by formula to eligible states and eligible metropolitan statistical areas (EMSAs).
  - 75% of the formula allocation is awarded based on cumulative AIDS cases to states and EMSAs.
  - 25% of the formula allocation is awarded as a bonus to EMSAs that have a higher than average per capita incidence of AIDS, as reported the previous year by the CDC.

● A community’s Consolidated Plan serves as its application to HUD for HOPWA (formula) funds.
Formula Program: Administration of Funds

- A Project Sponsor is a nonprofit organization or governmental housing agency that receives funds under a contract with a grantee to carry out eligible activities.
  - Each grantee awards funds to project sponsors based on the needs and priorities outlined in its Consolidated Plan and Annual Action Plan.
  - Grantees are responsible for monitoring and oversight of project sponsors.
  - Grantees are responsible for collecting performance data from project sponsors and reporting to HUD.
Competitive Program: Funding

- 10% of annual funding is awarded through HUD’s annual competitive process.
  - Eligible activities and available funding amounts are outlined in the SuperNOFA.
  - Applicant can be a state, city, or nonprofit organization.

- 2009 Appropriations Act required that priority be given to the renewal of expiring competitive grants that have successfully undertaken permanent supportive housing projects.
  - Grant procedures are described in CPD Notice 09-01.
After renewals are awarded, and if renewal funding remains available, a grants competition to solicit applications for new projects may be announced in HUD’s SuperNOFA.
Technical Assistance: Funding

- A small percentage of the annual HOPWA appropriation can be set aside for the delivery of technical assistance, training, and oversight.
  - Goal is to strengthen the management, operation, and capacity of HOPWA grantees, project sponsors, and potential applicants of HOPWA funding.

- Nonprofit and for-profit organizations are eligible to apply for funding.
Obligation & Expenditure Requirements

- **Obligation Requirements:**
  - Formula and TA grants must be obligated within 2 years or cancelled by statutory limit.
  - Competitive grants must be obligated within 3 years or cancelled by statutory limit.

- **Expenditure Requirements:**
  - Competitive and TA grants have 3-year grant agreements. An extension up to 12 months (for cause) may be approved by the Field Office.
  - Formula grants must be expended within 5 years or cancelled by statutory limit.
Financial Timeliness

- HOPWA adopted a financial timeliness measure in 2008:
  - Balances on hand/ New Formula allocation
  - Balances on hand should not exceed 1.5 times the amount of the new formula allocation to be received

- Those grantees not achieving this goal are provided with technical assistance.
Part 3: HOPWA & the Consolidated Planning Process

- What is the Con Plan?
- Con Plan Requirements
- Annual Action Plan Requirements
Consolidated Planning

- Community-wide “master” plan for affordable housing in local communities and states.
  - Process takes place every 3 to 5 years, representing the community’s long-term strategic plan.
- Serves as the community’s application to HUD for CDBG, HOME, ESG, and HOPWA (formula) funds.
- Must describe the general priorities for allocating investments geographically within the EMSA.
Con Plan – Housing Market Analysis

- The Con Plan must include a Housing Market Analysis that describes the significant characteristics of the jurisdiction’s housing market, including the supply, demand, condition, and cost of housing.
  - The plan must include an analysis of the housing stock available and accessible to persons with HIV/AIDS.
Con Plan – Housing and Homeless Needs Assessment

- The Con Plan must also include a Housing and Homeless Needs Assessment.
  - Must estimate the number and type of families that are homeless and in need of housing, including those with HIV/AIDS.
  - Must also describe the size and characteristics of the population with HIV/AIDS in the community.
Annual Action Plan

- Annually, the community’s coordinating agency prepares an *Annual Plan* for implementing the Con Plan strategies during the subsequent 12 months.

- The Annual Plan includes a description of activities to be undertaken during the year that will address the jurisdiction’s priority needs.
  - The activities must describe the number and types of families that will benefit, the local objectives, and the priority need(s) addressed.

- Communities must develop a comprehensive HIV/AIDS housing strategy to identify unmet need and determine how resources will be targeted.
HOPWA Requirements in Annual Action Plan

- Annual Plan must outline method for selecting project sponsors.
  - Community based
  - Faith based

- Annual goals must be specified for number of households to receive assistance through:
  - STRMU
  - TBRA
  - PBRA

- Action Plans can include grantee policies, such as instituting caps (STRMU) or limiting eligibility, along with plans that involve health care costs subject to payers of last resort documentation.
Impacting the Con Plan Process

- Important to assure that the local planning entity is aware of existing HOPWA plans and has data on HIV/AIDS housing needs and priorities.
- Con Plan requires consultation with organizations that provide housing and supportive services to those with special needs.
- Involvement in ongoing task forces or committees may be best method for impacting the process.
Part 4: Integration with Other Community Planning Efforts

- Consolidated Plan
- Ryan White
- Continuum of Care
Collaborative Planning & Partnerships

- **What** are they & what sources of funding are affected?
- **Who** participates?
- **How** do they work?
- **Why** do it?
Why is Collaboration Important?

- Simply, because we can’t afford not to! Need is greater than available resources.

- Collaboration:
  - Increases understanding of interrelationship among funding streams.
  - Supports an appropriate systems-level response.
  - Leads to more efficient use of funds (prevents duplication of services).
  - Brings beneficial outside perspective.
  - Involves key players to develop recommendations.
HUD’s Consolidated Plan

● What?
  – Comprehensive plan required by HUD to establish priorities, goals, and strategies for how funds will be used to address local housing and community development needs.
  – Governs the use of HOME, CDBG, ESG, and HOPWA funds.

● Who?
  – Local government representatives, housing developers, housing providers, social service and health agencies, community members, etc. HUD requires substantial input from citizens.
HUD’s Consolidated Plan (cont.)

- How?
  - The Con Plan process takes place every 3 to 5 years, representing the community’s long-term strategic plan.
  - Annual planning usually begins seven or more months before the beginning of the subsequent program year.
  - Task force members compile and analyze data and draft the report. However, at least two public hearings must be held to obtain citizens views and respond to proposals and questions.
Ryan White Program

- **What?**
  - Intended for states and communities to increase the availability of healthcare and supportive services for persons living with HIV/AIDS whose needs are not otherwise met through public programs or private insurance.
  - Funding through U.S. Department of Health and Human Services, Health Resources and Services Administration (HRSA).
  - Funds available through Ryan White Parts A-F.
  - Requires a needs assessment and strategic plan for states and communities that receive formula funding.
Ryan White Program (cont.)

- **Who?**
  - Mandates that planning involve a range of representative categories to ensure broad community input, including:
    - Health care agencies
    - Housing organizations
    - Community-based providers
    - 33% must be people receiving HIV-related services.
Continuum of Care Planning

- **What?**
  - Community- or region-wide planning process to identify gaps in local housing and services and coordinate strategies to meet the specific needs of homeless individuals and families.
  - Funds available through McKinney-Vento Act: Supportive Housing Program, Shelter Plus Care, and Section 8 Moderate Rehab SRO.
  - Funding is prioritized to expand permanent supportive housing.
Continuum of Care Planning (cont.)

- **Who?**
  - Community members, including state and local government, homeless housing and service providers, housing developers, private foundations, neighborhood groups, and homeless and formerly homeless people.

- **How?**
  
  Annual planning process includes:
  - Collecting data on the needs of homeless individuals and families;
  - Conducting an inventory of the availability and accessibility of existing housing and services;
  - Identifying opportunities for linkages with mainstream housing and service programs; and
  - Developing strategies to address highest priority needs/gaps.
Based on the information compiled and proposals received through the planning process, the CoC prepares and submits an application to HUD for McKinney-Vento competitive program resources through the annual HUD SuperNOFA competition.
Part 5: Client Eligibility

- Establishing Income Eligibility
- Documenting HIV/AIDS Status
- Confidentiality Requirements
- Termination of Assistance
Client Eligibility

- The HOPWA program serves low-income persons, and their families, living with HIV/AIDS.
  - Households must be at or below 80% of Area Median Income.
  - HIV/AIDS status must be documented.
Establishing Income Eligibility

- Income can be no greater than 80% of Area Median Income (AMI).
  - See [http://www.huduser.org/datasets/il.html](http://www.huduser.org/datasets/il.html) for income limits by county.
- Annual re-determination of income eligibility is required.
- Income of all household family members over age 18 included in the calculation.
- The HUD earned income disregard applies (see 24 CFR 5.617).
**Documenting HIV/AIDS Status**

- Documentation **must** come from HIV test conducted by a physician, HIV counseling center, or community health center.

- HIV/AIDS diagnosis **must** be made by health professional competent to make determination.
  - Case manager statement is not sufficient.
Client Confidentiality

- Information on the HIV/AIDS status of a client is subject to confidentiality requirements.
  - Mandated by Section 856 of the AIDS Housing Opportunity Act.
  - 24 CFR 574.440 states that “the grantee shall agree, and shall ensure that each project sponsor agrees, to ensure the confidentiality of the name of any individual assisted under this part and any other information regarding individuals receiving assistance.”
Client Confidentiality (cont.)

- Information related to HIV/AIDS status only to be used for purpose of determining eligibility.
- Information should only be accessible to staff who determine eligibility or provide support.
- Paper files should be maintained in locked cabinets; security software required for electronic files.
- Important to conduct staff training and periodic monitoring of procedures.
- Be careful about inadvertent disclosures (e.g., checks, caller ID, fax ID, housing quality inspections, publicity for project-based developments).
Client Confidentiality (cont.)

Some ways to protect confidentiality:

- Incorporate a subsidiary organization with a generic name to handle housing payments to landlords or mask the parent organization on IRS documentation sent to landlords.

- Create a separate bank account with checks that do not list the sponsor’s name, using a generic name such as “Rental Assistance Program.”

- Rent a P.O. Box for receiving mail related to housing assistance and to use as the address on payments to landlords.

- Use a dedicated phone number and line for dealing with landlords, answering it with a generic program name.
Termination of Assistance

- **Death**: Surviving family members may continue to receive housing assistance and/or supportive services for a grace period following the death of the family member with AIDS.
  - The grantee or project sponsor establishes the grace period.
  - Grace period cannot exceed one year.

- **Violation of requirements**: Clients may be terminated from the program for failing to meet program or occupancy requirements.
  - Grantees must have a formal written process which follows due process law.
  - Process must include, at a minimum, written notice with a clear statement of reasons for termination, allowance for review and rebuttal by tenant, and prompt written notice of final decision.
Part 6: Eligible Activities

- Direct Housing Assistance
- Supportive Services
- Other Program Activities
- Administrative Expenses
Direct Housing Assistance

- Facility-Based Housing Development
- Facility-Based Housing Operations (including PBRA)
- Tenant-Based Rental Assistance (TBRA)
- Short-Term Supported Housing
- Short-Term Rent, Mortgage, and Utility (STRMU) Assistance
Facility-Based Housing Development

- Costs associated with the acquisition, rehabilitation, conversion, or repair of facilities to provide housing to HOPWA-eligible households.
  - Rehabilitation must bring facility up to HOPWA housing quality standards (see 24 CFR 574.310(b)).

- Minimum use periods:
  - 10 years for acquisition and/or substantial rehab
  - 3 years for non-substantial rehab & repairs
Facility-Based Housing Development (cont.)

- Also includes costs related to new construction for community residences and single room occupancy (SRO) dwellings.
  - A community residence is “a multi-unit residence designed for eligible persons to provide a lower cost residential alternative to institutional care….” (24 CFR 574.340(a))
  - An SRO is a residential property that includes multiple single-room dwelling units. Each room is for occupancy by a single eligible individual. Under the HOPWA program, SRO units must typically include food preparation and sanitary facilities.

- Minimum use period for new construction is 10 years.
Uniform Relocation Assistance

- A federal law designed to ensure uniform, fair, and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects.
- The Uniform Act protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.
- For more information on URA requirements, see:
  - 49 CFR Part 24 (the government-wide regulation that implements the URA).
Environmental Standards

- HOPWA regulations require compliance with the National Environmental Policy Act (NEPA).
- Construction and rehabilitation projects must go through an environmental review before a grantee can commit funds to the project or expend HOPWA or other funds.
- The purpose of the review is to ensure that federal monies are used for capital development only for properties free of major hazards and environmental problems.
- The environmental review process is the responsibility of the grantee and should be part of the grantee’s grant-making and fund-commitment process with the sponsor.
Facility-Based Housing Operations

Activities include:

- Leasing a building or scattered site units.
- General housing operations (e.g., maintenance, security, insurance, utilities, furnishings, equipment/supplies).
- Provision of project-based rental assistance (PBRA)
  - Rental subsidy stays with housing facility/units.
  - Requires a “blended management” approach, integrating housing management with the provision of supportive services.
  - HOPWA TBRA and Section 8 regulations apply (e.g., tenant rent payment, HQS/habitability standards).
Tenant-Based Rental Assistance (TBRA)

- Monthly rental subsidy that stays with client in housing of their choice within the HOPWA EMSA.
- The subsidy covers the difference between the Fair Market Rent (or other approved rent standard) and the tenant’s contribution.
  - Tenant must pay greater of 10% of monthly gross income, 30% of monthly adjusted income, or the designated welfare housing assistance amount.
  - Annual income recertification is required to assure ongoing eligibility.
  - Tenants may request interim rental adjustment based on increases or decreases in income.
- HOPWA housing quality standards apply (see 24 CFR 574.310(b)).
Short-Term Supported Housing

- Transitional housing facilities that provide temporary shelter.
- Assistance is limited to 60 days during a 6-month period.
  - The 60 days do not have to be consecutive.
- Facilities may not provide housing for more than 50 individuals or families at any time.
- Programs must, to the extent possible, provide individuals with the opportunity for placement in permanent housing.
- Programs must also provide an opportunity to receive case management and supportive services.
Short-Term Rent, Mortgage, and Utility Assistance (STRMU)

- Time-limited housing assistance designed to prevent homelessness.
  - Assistance is provided to help homeowners and renters remain in their current place of residence.
  - STRMU cannot be used to assist a client with locating a housing unit, security deposits, first month’s rent, or other move-in support.
  - Designed as a short-term intervention. Other types of assistance (rental assistance or residency in community facility) should be used for clients with ongoing needs.
**STRMU (cont.)**

- Grantees may provide assistance for rent, mortgage, and/or utilities for up to 21 weeks in any 52-week period (weeks do not have to be consecutive).
  - Amount of assistance varies per client depending on funds available, tenant need, and program guidelines.
  - Grantees may authorize project sponsors to cap payments, though caps must be applied uniformly.
  - STRMU cannot be provided if assistance is also being received from any other HOPWA, Federal, state, or local housing subsidy program.

- Funds may be used for reasonable and appropriate motel/hotel vouchers for up to 30 days if no appropriate shelter beds are available and subsequent rental housing has been identified but is not immediately available for move-in.

- HQS inspection not required initially if assistance is needed to prevent homelessness and unit is safe and decent.
  - However, providers are required to assess whether unit is decent, safe, and sanitary as part of their responsibility to provide ongoing assessment of housing needs/stability. Any deficiencies should be addressed through housing service plan.
Supportive Services

- Services which complement the provision of housing assistance to beneficiaries, thereby helping promote housing stability and reduce the risk of homelessness.

- Examples include:
  - Assessment & Case Management
  - Drug and Alcohol Abuse Treatment and Counseling
  - Mental Health
  - Day Care
  - Personal Assistance
  - Nutritional Services
  - Intensive Care (when required)
  - Assistance in Other Federal/State/Local Benefits and Services.
Supportive Services (cont.)

- HOPWA funding should generally be coordinated with other health services for beneficiaries.

- HUD advises that health care payments may only be made in the case that no other funds or likely means of compensation for health care purposes are available in a jurisdiction or to a client.
  - If HOPWA funds are used to make health care payments under this authorization, the grantee must document evidence that the client would not otherwise receive health care assistance.
Other Program Activities

- **Permanent Housing Placement**
  - Expenditures that help establish eligible persons in a housing unit where ongoing occupancy is expected to continue.
  - Eligible expenses include application fees, credit checks, and reasonable security deposits (not to exceed 2 months rent).

- **Housing Information Services**
  - Information and referral services to assist eligible persons with locating, acquiring, financing, and maintaining housing.

- **Resource Identification**
  - Activities to identify, coordinate, and develop housing assistance resources for eligible persons.
Administrative Expenses

- Costs for general management, oversight, coordination, evaluation, and reporting on eligible activities. Administrative expenses include:
  - Staff time for program coordination, management, and evaluation
  - Travel for official business
  - Contracted services (legal, audit, accounting)
  - Goods and services needed for admin (e.g., equipment rental/purchase)

- Limits
  - 3% allowable for HOPWA grantee
  - 7% (of Sponsor’s allocation) allowable for Project Sponsor
  - Competitive grantees who also carry out program activities are limited to 3%
Administrative Expenses (cont.)

What are the administrative requirements?

- Grantees are responsible for:
  - Ensuring that grants are administered in accordance with applicable laws and regulations.
  - Ensuring that project sponsors carry out activities in compliance with all applicable requirements.
  - Reporting to HUD on use of funds and programs accomplishments.
Part 7: Calculating Benefit Payments

- Ongoing Rental Assistance
- Short Term Rent, Mortgage, and Utility Assistance
Calculating Benefit Payments for Rental Assistance Programs

- Clients must pay rent unless residing in short-term supported housing.
  - Rent standards apply to project-based rental assistance (including community residences) and tenant-based rental assistance.
Calculating Benefit Payments for Rental Assistance Programs (cont.)

Tenants pay the higher of:

1. 30% of the family’s monthly adjusted income.
   - Adjustment factors include age, medical expenses, size of family, childcare expenses, and other factors described at 24 CFR 5.609(a).
   - The calculation of adjusted income must include the expense deductions outlined at 24 CFR 5.611 (a).
   - The HUD earned income disregard also applies (see 24 CFR 5.617).

2. 10% of family’s monthly gross income.

3. The portion of any welfare assistance payments specifically designated for housing costs.
Calculating Benefit Payments for Rental Assistance Programs (cont.)

- The **maximum subsidy** is the difference between:
  - The rent standard or reasonable rent (whichever is lower) AND
  - The client’s contribution (as calculated under CFR 574.310).

- The rent standard is either the HUD published Fair Market Rent (FMR) or the HUD-approved community-wide exception rent (typically requested by the local PHA).
  - Grantees may increase the rent standard by 10% for up to 20% of the units.

- Rent reasonableness: The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private (unassisted) market.
Shared Housing: Rent is adjusted based on the pro rata share of the private space used by the HOPWA beneficiary (excluding common space).

- For example, if the unit is a 3-bedroom unit and the beneficiary is using one bedroom, the rent would be 1/3 of the 3-bedroom rent standard.
- Shared housing arrangements should be voluntary.
Calculating STRMU Benefit Payments

- Grantees may provide assistance for rent, mortgage, and/or utilities for a period of up to 21 weeks in any 52-week period.
  - Amount of assistance varies per client depending on funds available, tenant need, and program guidelines.
  - Grantees may authorize project sponsors to cap payments.
  - Assistance must be paid directly to third party (i.e. landlord, mortgage company, utility company).

- If they are able, clients should pay portion of their housing costs under STRMU.
  - Portion of rent paid by tenant does not count against the 21-week STRMU benefit ceiling.
Calculating STRMU Benefit Payments (cont.)

● Grantees must ensure that all project sponsors use the same method to determine the annual STRMU assistance period. Methods include:
  – A set standard annual period for all clients (either the grantee’s operating year or the calendar year); or
  – A separate period of eligibility for each client, based on the date a STRMU payment is first made on behalf of a client.
Calculating STRMU Benefit Payments (cont.)

- Three methods for calculating the maximum allowable period of benefits:
  - Count calendar days of assistance with max being 147 (21 x 7).
  - Round each month to 4 weeks of assistance, yielding a maximum total of 5 months and 1 week of assistance.
  - Track assistance using the precise number of weeks in a month (e.g., a full month’s rent would be tracked as 4.3 weeks, 75% of a month’s rent would be tracked as 3.2 weeks, etc.)
Calculating STRMU Benefit Payments (cont.)

- To be eligible for STRMU assistance, there must be evidence of client tenancy or ownership and residency.
  - Rental payments: Client must be named tenant under valid lease or provide other evidence that he/she is legal resident of premises.
  - Mortgage payments: Client must demonstrate that he/she is owner of mortgaged real property (mortgage, deed of trust, title insurance policy).
  - Utility payments: Client must have account in their name or proof of responsibility to make utility payments (cancelled checks, receipts).
Calculating STRMU Benefit Payments (cont.)

- Clients must demonstrate need through verifiable documentation (e.g., bills, receipts, late/default notices).
- Program staff are responsible for verifying that:
  - The household’s needs are for actual costs;
  - Other resources, such as household income, are not reasonably available to address the unmet housing need;
  - The STRMU payment will alleviate the payment delinquency so as to prevent the eviction and result in (at least temporary) stability for the household; and
  - The household’s ongoing housing needs were assessed or will be assessed in connection with the development of an individual housing service plan.
SECTION II – PROGRAM PLANNING, MANAGEMENT, & REPORTING
Part 8: Service Planning

- Client Intake & Assessment
- Developing the Housing Plan
- Plan Updates & Reassessment
- Client File Contents
Service Planning

- HOPWA regulations require “appropriate” supportive services to be provided as part of any HOPWA-assisted housing.
- Individualized housing services plans are required as means to address HOPWA outcome goals.
- Components of service planning include:
  - Intake and Assessment
  - Mutually Developed Plan
  - Plan Sign Off
  - Plan Update & Reassessment
  - Transfer & Termination
Client Intake

- Gather basic information to make determination of program eligibility
  - 80% AMI (may be more restrictive locally)
  - HIV/AIDS diagnosis
  - Other agency requested documentation

- Remember, the name and any identifying information of individuals assisted under the HOPWA Program must be kept confidential (24 CFR 574.440).
Client Assessment

- Seek more in-depth information to identify needs and barriers:
  - Housing history (type, length of stay, reasons for leaving, rental arrears, evictions)
  - Current needs (facing homeless now, or likely in future?)
  - Criminal history (when, type & level of offense)
  - Income (sources, budgeting skills, debt, credit history)
  - Behavioral and mental health (drug and alcohol use, mental illness, AIDS-related dementia, other health conditions)
  - Family and support system
Client Assessment (cont.)

Important to identify signs of housing instability:

- Failure to make timely rent and utility payments.
- Inability to physically maintain unit in safe and sanitary condition.
- Non-compliance with housing rules and/or lease.
- Violation of HOPWA program agreements.
Developing the Housing Services Plan

- Plan should be joint effort between case manager and client.
- Goal should be to maximize housing stability and independence.
- Plan should address all needs and barriers identified in assessment; identify all available programs and resources, both HOPWA and non-HOPWA.
- Plan should identify specific steps/activities for both case manager and client; include timelines and consequences, as applicable.
- Encourage clients to consider realistic housing options.
- Connect clients to necessary HIV-targeted and mainstream resources.
- Document.
Plan Sign Off

- Client and case manager should sign off on all plans and updates.
- Formalizing the agreement will maximize investment and ownership of the Plan by the client.
Plan Update & Reassessment

- Regular follow-up should occur at a frequency appropriate to need.
  - Assessment (formal or informal) can take place with each client interaction.
  - Does the situation warrant a written update?

- HOPWA requires at least annual income and rent certification, presenting an opportunity for reassessment and care plan/housing plan update.

- The Case Management Standards of some states require updates every 6 months – does yours?
Transfer & Termination

- Develop agency policies for:
  - Circumstances under which termination or discharge will occur
  - Assistance to surviving family members
  - Formal process allowing clients a review of the decision

- Must ensure that supportive services are provided so termination occurs only in severe circumstances.

- Document reasons and actions taken to resolve issues.

- See 24 CFR 574.310(e).
Client File Contents

- Well maintained client files with adequate documentation are critical. Files should contain:
  - Valid HIV/AIDS verification.
  - Completed household income verification with supporting documents (to be updated annually).
  - Signed Release of Information (to be updated annually).
  - Completed intake/assessment forms with client data.
  - Verification of expenses and supporting documents.
  - Housing plan and/or individual service plan with updates.
  - Signed program service agreement.
Client File Contents (cont.)

- Completed gross and adjusted income and rent calculation worksheets (if TBRA), updated annually or when significant change occurs.
- Shared housing rent calculation worksheet (if applicable).
- Current Fair Market Rent (FMR) and utility allowance charts (if applicable).
- Habitation standards or HQS inspection documentation and lead-based paint notification (updated annually, if applicable).
- 21-Week Tracking Sheet (if STRMU).
- Any grievances filed, including follow-up and outcomes.
- Signed statement of receipt of policy and procedures.
- Termination documentation (if applicable).
- Client contact case notes.
Part 9: Performance Reporting

- Why Do It?
- Reporting for Formula Grantees
- Reporting for Competitive Grantees
- Overview of Reporting Changes
- HOPWA Performance Profile
- HOPWA & HMIS
Measuring Performance

• Collecting, sharing and evaluating results of program achievements in assisting special needs.

• Assess needs and plans in using resources for affordable and appropriate housing as part of area Consolidated Plans with Citizen participation.

• Undertake community collaborations for accessing health-care and other public resources.

• Guide project adjustments to better meet identified needs, target technical assistance.
Performance Reporting for Formula Grantees

- Define goals & objectives through Consolidated Plan.
- Report accomplishments/performance data through:
  - Consolidated Annual Performance and Evaluation Report (CAPER), Form HUD 40110-D; and
  - HUD’s Integrated Disbursement and Information System (IDIS).
- Must be submitted to HUD within 90 days after close of program year.
Performance Reporting for Formula Grantees

- CAPER includes:
  - Narrative/Executive Summary
  - Housing Assistance Accomplishment Data
    - Chart 1: Planned Actions
    - Chart 2: Actual Performance
  - Housing Stability and Access to Care Outcomes
- Must be submitted to HUD within 90 days after close of program year.
Performance Reporting for Formula Grantees

Integrated Disbursement and Information System (IDIS):
- Computer system accessed via the Internet.
- Provides electronic disbursement of funds.
- Collects data on demographics, activities, expenditures.
- Associates activities with grantee’s Consolidated Plan and CPD Performance Outcomes.
- Recent enhancements include client outcome data and use of standard reports.
Performance Reporting for Competitive Grantees

- Goals & objectives defined on SuperNOFA Logic Model (Form HUD-96010).
- Accomplishment/performance data reported through Annual Progress Report (APR), Form HUD 40110-C.
- APR must be submitted to HUD within 90 days after close of program year.
Performance Reporting for Competitive Grantees

- APR includes:
  - Narrative/Executive Summary
  - Client Demographics
  - Number of Households served and Expenditures by Activity
  - Housing Stability and Access to Care Outcomes
  - Project Sponsor Information
  - Logic Model, updated annually
Grantees must track/report household destination at year-end or exit from the program. Outcomes will fall into one of three categories:

1. Stable Housing Outcomes:
   - Continuing with HOPWA assistance (TBRA or facility-based assistance)
   - Private Housing
   - Other Subsidized Housing
   - Long-Term Care/Institution

2. Non-Stable Housing Outcomes:
   - Disconnected
   - Jail/Prison
   - Homeless (Street/Emergency Shelter)
(3) Temporary Housing:

- Used for clients receiving STRMU and expected to need the assistance again in the future to maintain housing.
- Not as desirable as the stable housing outcomes, but reflects the prevention of homelessness.
- Housing Services Plan is key to moving clients who need ongoing assistance through STRMU to a more stable, long-term outcome.
Outcome Measures for Access to Care & Support

1. Has a housing plan for maintaining or establishing stable on-going residency.
2. Had contact with a case manager/benefit counselor at least once in the last three months (or consistent with the schedule specified in their individualized service plan).
3. Had contact with a primary health care provider at least once in the last three months (or consistent with the schedule specified in their individualized service plan).
4. Had medical insurance coverage or medical assistance.
5. Obtained an income-producing job created by this project sponsor during the year.
6. Obtained an income-producing job outside this agency during the year.
Performance Reporting

- **Info on Grantee/Project Sponsor/Subrecipients**
  - Organization and Subgrantee information revised to cover elements in the Federal Funding Accountability and Transparency Act, 2006 (PL 109-282)

- **CAPER Grant Summary streamlined for consistency with APR:**
  - Housing outputs (households by type of housing & area);
  - Assessing achievement of outcomes, compared with goal;
  - Coordination with other resources, as established in Con Plans; and
  - Technical assistance needed.
Performance Reporting (cont.)

- Unmet Housing Needs chart
  - Assessment of number of households by type of housing need. Must provide data source (e.g., Consolidated Plans or other relevant information source).

- Leveraging of other resource commitments
  - Consolidated to one chart and streamlined by sources for two categories (housing assistance and supportive services).

- Resource Identification & Technical Assistance
  - Reported as separate items to improve accuracy.
Housing Assistance Type

- Clarified to include master-leased units and scattered-site leased units under facilities (along with PBRA).
- Separates output and outcome information by facility type (permanent housing facilities or transitional/short-term housing facilities).
- Note: Edits maintain 2006 HOPWA matrix for 9 types of housing status results, consistent with HMIS data elements.
Performance Reporting (cont.)

- Short-Term Rent, Mortgage, and Utility Assistance (STRMU):
  - Clarifies use of and outcomes from short-term assistance.
  - Differentiates ongoing use of STRMU in more tenuous housing arrangements where need for additional STRMU assistance is likely, from more stable arrangements where households receive STRMU to avert crisis but are not likely to need additional assistance.
  - Status of client households reported based on assessment of their on-going housing situation, as known.
Performance Reporting (cont.)

● Access to Care:
  - Simplified to collect annual results only (drops entry/exit reports).
  - Key status-of-care indicators as follows:
    ● Housing Services Plan
    ● Contact with a case manager
    ● Contact with a primary health care provider
    ● Accessed medical insurance/assistance
    ● Accessed or maintained sources of income/benefits (drops chart on changes in income levels)
Performance Reporting (cont.)

- **Supportive Services**
  - Streamlined into one common chart.
  - Grantee summaries on services reported by two types of project sponsor programs:
    1. Services provided by project sponsors also delivering HOPWA housing assistance; and
    2. Services provided by project sponsors serving households with other housing arrangements.
HOPWA Performance Profile

- Designed to improve transparency and accountability by sharing information with the public on grantee performance.
- Profile on each grantee will be created and posted to HUD website.
- Profile highlights:
  - Timeliness (with regard to expenditures)
  - Expenditure by type of activity (housing, services, admin, etc.)
  - Expenditure by type of housing assistance (STRMU, TBRA, facility-based)
  - Housing Outputs (number of households served, by type of housing assistance)
  - Client Outcomes (percentage of clients stably housed, unstably housed, and temporarily housed, by type of assistance)
HOPWA Performance Profile Sample

Formula Expenditures by Type of Housing

- TBRA 39.9%
- PH Facilities Operations & leased units 8.7%
- PH facility developed & in service 1.9%
- TH/ST facilities Operations 8.7%
- STRMU 17.9%
- Facility units w. operating costs 22.7%
- TH/ST facility 0.2%
Formula Expenditures by Activity

- Housing Development: 5.4%
- Housing Assistance: 54.6%
- Housing Placement Assistance: 5.6%
- Supportive Services: 26.7%
- Administration and Management Services: 7.8%
Interaction Between HOPWA and Homeless Reporting

- Significant overlap between homeless population and low-income persons with HIV/AIDS.
  - Important for HOPWA providers to actively participate in Continuum of Care (CoC) planning process.
  - Also important for HOPWA providers to consider the benefits of HMIS.
What is HMIS?

- A Homeless Management Information System (HMIS) is an electronic data collection system that facilitates the collection of client-level data on homeless individuals and families using homeless assistance services.
  - HMIS data can help communities understand trends and patterns. This information is essential to making strategic decisions about programming and resource allocation.
  - HMIS data can be used to measure outcomes for a single provider or across an entire system.
  - HMIS data can be aggregated for program-level reporting in IDIS, CAPERs, and APRs.
What is HMIS? (cont.)

- HMIS is a valuable tool that goes beyond data reporting:
  - Creates a more streamlined client intake process.
  - Helps coordinates case management efforts.
  - Reduce the amount of data entry by linking systems.
  - Improves benefits screening.
  - Create easier access for clients by decreasing the number of times information must be provided.
  - Provides a better understanding of the characteristics of the population served (and therefore allows development of more appropriate/effective programs).
  - Prevents duplication of services.
HOPWA & HMIS

- HOPWA funded projects that target homeless persons are **required** to participate in HMIS.
- HOPWA projects that assist homeless persons but do not specifically target the subpopulation are **not required** to participate in HMIS, but are encouraged to consider the benefits of HMIS.
- HMIS standards require the collection of information on HIV/AIDS status, though such information is covered by confidentiality requirements.
- Sensitive/protected client information should be recorded only when a program has adequate data confidentiality protections.
Part 10: Financial Management & Documentation

- Sources of FM Regulations
- FM Objectives
- Basic Elements of Internal Controls
- Principles of Allowable Costs
- Common Findings & Concerns
Sources of FM Regulations

- Uniform Administrative Requirements
  - State/local government: 24 CFR Part 85
  - Nonprofit organizations: 24 CFR Part 84
- Cost Principles
  - OMB Circulars A-87 and A-122
- Audits
  - OMB Circular A-133
Financial Management Objectives

- Protecting funds, property, & other assets against loss or misuse.
- Accounting for where funds came from and how they were used.
- Retaining source documentation to support receipt and use of funds.
- Ensuring expenditures are consistent with the budget.
FM Objectives (2)

- Ensuring costs are reasonable and properly allocated.
- Reporting complete and current financial results.
- Ensuring compliance requirements of funding sources (e.g. spending caps).
- Using audits to strengthen FM systems.
What are Internal Controls?

- Policies, procedures, responsibilities and records that allow an organization to maintain control of:
  - All grant and subgrant cash
  - Real and personal property
  - Other assets
Basic Elements of Internal Controls

- Organizational chart that includes responsibilities for approving and recording financial transactions.
- Written policies and procedures covering:
  - Approval authority for transactions
  - Methods for recording transactions
  - A chart of accounts
- Separation of duties so that no one person has control over an entire transaction.
- Controlled access to records, forms and assets.
- Regular reconciliation of records, comparing reported and actual assets and liabilities.
Basic Principles of Allowable Costs

- Every allowable project cost should be:
  - Eligible (both allowed by HOPWA program regulations & approved under grantee-sponsor agreement);
  - Reasonable (cost in line with what others might pay for the same thing);
  - Allocable (can be assigned to a particular grant and activity); and
  - Documented (e.g., signed timesheets or rent payments backed up by leases).
Common FM and Documentation Problems

- Personnel or housing assistance costs not supported by adequate documentation.
- Reported and charged costs do not agree with accounting records.
- No documented basis to support the allocation of indirect costs, such as office and equipment leasing.
- Lack of internal controls.
- Salaries and wages are not based on timesheets but rather on estimates or static pro-rated ratios.
- Mistakes in billing staff time.
Billing Staff Time

- Many project sponsors mistakenly bill program staff as administrative expenses instead of against a program activity.
- Example: Staff time spent administering TBRA may be billed to the project’s housing assistance line item rather than to the administrative line.
Additional Resources

www.hud.gov/offices/cpd/aidshousing/index.cfm
  HOPWA information and documents

www.HUDHRE.info/HOPWA section
  Homelessness Resource Exchange