



HOPWA Training Manual

HOPWA 101: An Introduction to the Housing Opportunities for Persons With AIDS Program

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Introduction to HOPWA

Housing Opportunities for Persons with AIDS (HOPWA) Program

About HOPWA Technical Assistance



This training is provided by Collaborative Solutions, Inc., under contract with TDA, Inc. Funding is provided by the National HOPWA Technical Assistance Program of the U.S. Department of Housing and Urban Development's (HUD) Office of HIV/AIDS Housing. Special thanks to Andrea White, CUCS, Inc. & Mariah Ybarra, AIDS Housing of Washington.


Collaborative Solutions, Inc. is a nonprofit agency based in Birmingham, AL providing HUD technical assistance throughout the Southeast.

Overview of Time Together

- Introductions and Overview of TA
- Part 1 – HOPWA Overview
- Part 2 – Access to HOPWA
- Part 3 – Uses of Grant Funds
- Part 4 – Additional Standards
- Part 5 – Annual Reporting
- Part 6 – Questions & Answers – Discussion


Part 1 – HOPWA Overview

- Program History & Description
- Statutory Purpose
- Strategic Goals
- Client Eligibility




Program History

- More than one million Americans are living with HIV
 - The Centers for Disease Control and Prevention estimate that approximately 40,000+ persons in the U.S. become infected each year
- The households affected by the disease are typically among the lowest income households
 - 72% with incomes less than \$25,000 per year




Program History (continued)

- In 1992, National AIDS Commission report...*housing serves as a base from which to receive care*
- The lack of stable housing for persons with HIV/AIDS prevents their ability to participate in HIV care, resulting in devastating health consequences and contributing to increased mortality rates



Program Description

- Federally-administrated grant program for state and local governments to develop a range of housing assistance and supportive services for low-income people living with HIV/AIDS and their families
- Created through the National Affordable Housing Act of 1990; authorized by the AIDS Housing Opportunity Act of 1992
- Administered by the Office of HIV/AIDS Housing (OHH) at HUD (Office of Community Planning and Development)



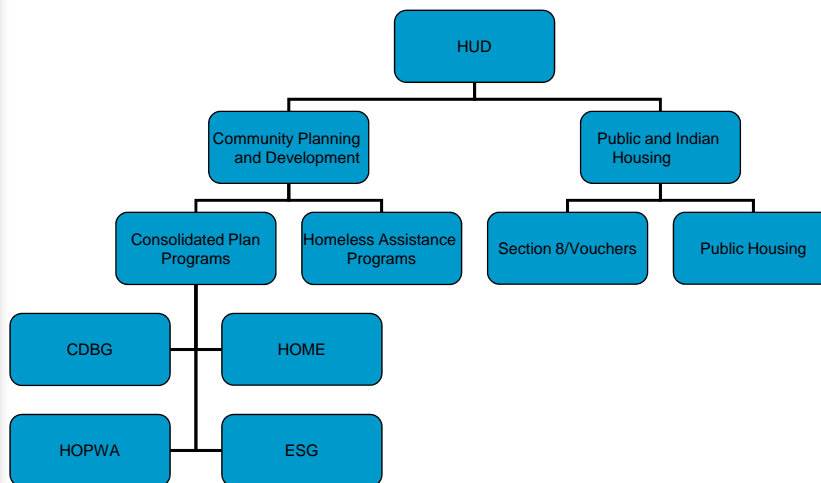
Program Description (continued)


- **\$3.5 Billion** in HUD HOPWA appropriations 1992-2007
- Annual appropriation has grown from \$42.9 million in 1992 to \$286.1 million in 2007

Program Description (continued)

- Consolidated Plan (5-year plan)
 - Community Development Block Grant (CDBG)
 - HOME
 - Emergency Shelter Grants (ESG)
 - HOPWA
- Action Plan (1-year plan) establishes targets for annual HOPWA outcomes

How HOPWA Fits in HUD






Purpose of HOPWA

“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 USC 12901




Purpose of HOPWA (continued)

HOPWA is:

- Not a homeless program
- Designed similarly to homeless initiatives
- Is not the only solution for housing someone with HIV disease (HUD has multiple resources)
- Often the link to getting tenants into permanent supportive housing
- Designed to work with existing housing resources


Did you know... People living with HIV are considered, in HUD language, persons with special needs



Strategic Goals

The HOPWA program:


- Creates and supports access to affordable housing for low-income persons with HIV/AIDS
- Promotes partnerships among state/local government and faith-based and community-based nonprofit organizations to identify and serve the housing needs of persons with HIV/AIDS



Strategic Goals (continued)


HUD Annual Performance Plan Indicators:

- Goal A: Promote decent affordable housing
 - A.1.3. The number of rental households and rental housing units assisted
 - Annual housing outputs
- Goal C: Strengthen communities
 - C.3.6. The percentage of HOPWA clients who maintain housing stability, avoid homelessness, and access care increases through the use of annual resources
 - Client household outcomes




HOPWA Outcomes

- The HOPWA CAPER and APR have outlined the following outcomes
- Assisted households will:
 - Have been enabled to establish or better maintain a stable living environment in housing that is decent, safe and sanitary
 - Reduce risk of homelessness
 - Improve access to health care and supportive services – reduce disparities




Benefits to Clients

- A better housing situation – more appropriate to needs
- Impact on health status through improved housing and access to care
- Reduce disparities in access to care



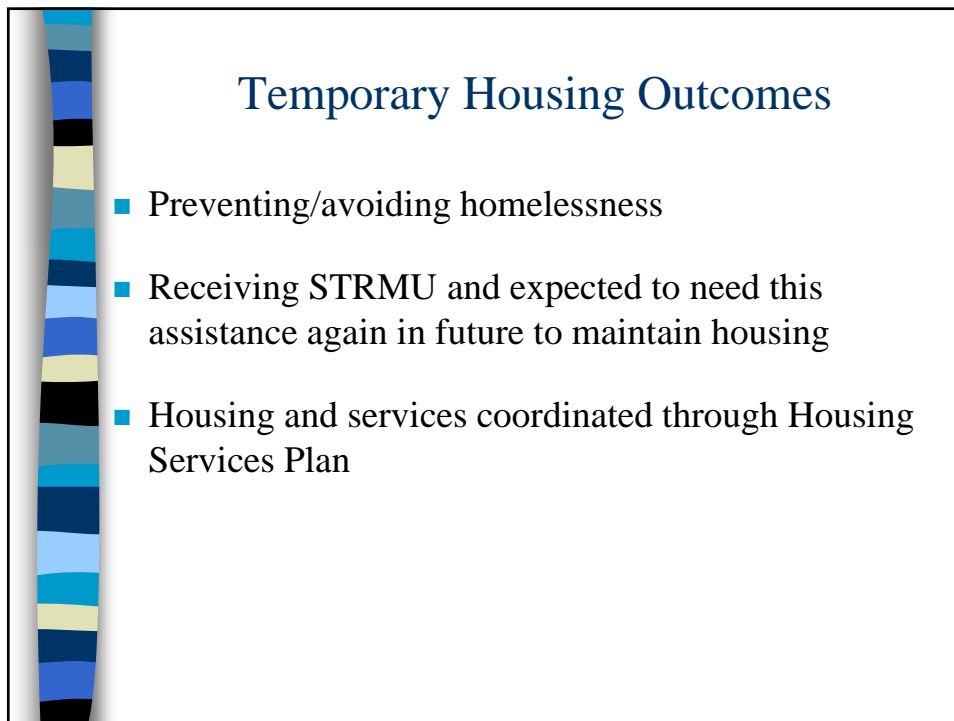
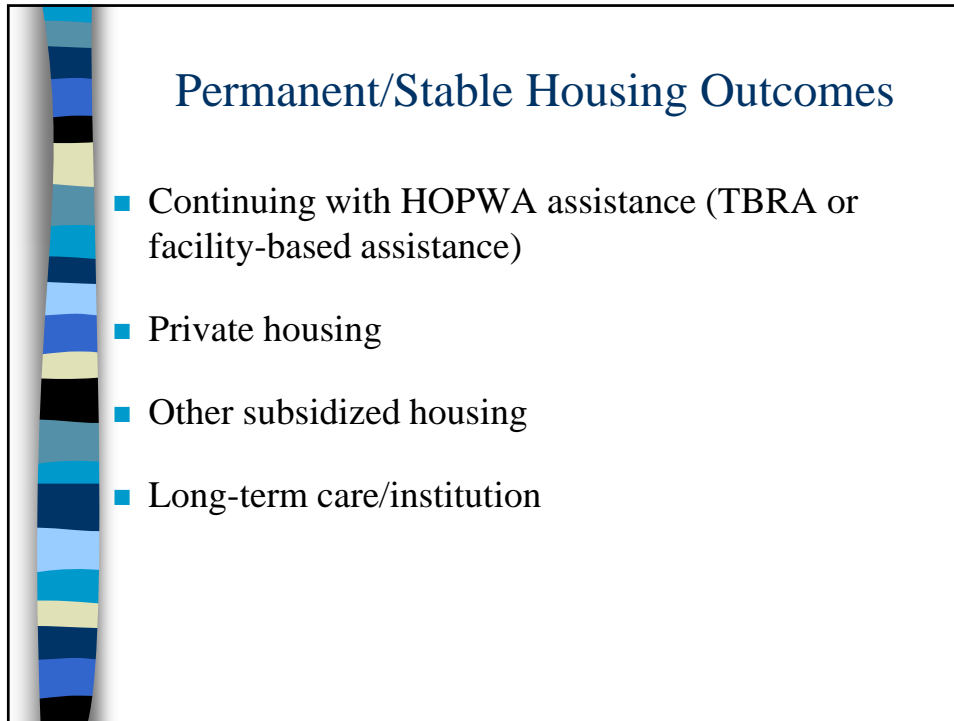
HOPWA Performance Goal


- By 2008 over 80% of HOPWA program clients will be in stable housing
- For competitive grantees, HUD expects at least one-half of beneficiaries will have stable housing during operating year



Client Household Outcomes


- **Permanent**/stable housing arrangements in place and not likely to use more short-term support
- **Temporary** housing situations/avoids homelessness, but likely to need more support
- **Unstable** situations, when former clients are known to be homeless, in jail, or disconnected from efforts






Unstable Housing Outcomes

- Disconnected
- Jail or Prison
- Homeless (street or shelter)




Access to Care and Services Outcomes

- Housing services plan
- Contact with case manager
- Contact with primary care provider
- Obtained health insurance/coverage
- Obtained employment



Housing Services Plans

- Determine housing needs, preferences, and strategy to achieve or maintain housing stability
- Identify eligibility for other housing assistance
- Link to supportive services to maintain stability
- Determine eligibility for mainstream assistance
- Set goals for housing and independence (client)
- Revise and update periodically
- Housing case management or housing information services for funding under HOPWA



Client Eligibility Requirements

Low income and living with HIV/AIDS:

- Persons who are documented to have HIV or AIDS
- Individuals or families with incomes at or below 80% of the area median income

**See 24 CFR 574.3 for definitions for eligible person and low-income individual*

** Individual jurisdictions may impose more stringent requirements for income and HIV/AIDS status, based on local housing availability and as approved in the Consolidated Plan*




HIV Documentation

- Made by health professional competent to make determination
- Documentation from HIV tests conducted by physician, HIV counseling center, or community health center (case manager statement not sufficient)
- Information on the HIV/AIDS status is subject to confidentiality requirements, as mandated by Section 856 of the AIDS Housing Opportunity Act




Income Eligibility Requirements

- Income no greater than 80% of area median income
- Annual re-determination
- Household composition – income of all family members over 18 counted
- Earned income disregard



People with Disabilities

- According to HUD, an HIV/AIDS diagnosis is considered a disabling condition
- Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on basis of disability in HUD programs
- Reasonable accommodations must be made to allow people with disabilities to participate in HUD programs
- Cannot provide different or separate housing, aid, or benefits to individuals with handicaps



Reasonable Accommodations


- Person with disabilities can receive support when housed with family member who owns the home
- Family income does not count toward assisted disabled person's income
- Housing payments must be reasonable for type and nature of housing
- Must be determined by physician that living with family member is important to client's overall health and well-being (case-by-case determination)

Part 2 – HOPWA Funds Allocation

- Formula Funds
- Competitive Grants
- Technical Assistance

HOPWA Formula Program


- Definitions
- Eligible Applicants
- Responsibilities
- Formula Allocations



HOPWA Formula Funds: Definitions

24 CFR 574.3


- *Applicant* is a state or city
- *Eligible Metropolitan Statistical Area (EMSA)* is a metropolitan area with a population greater than 500,000 and more than 1,500 cumulative AIDS cases
 - HOPWA differs from other HUD programs in that 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



HOPWA Formula Funds: Definitions (continued)

24 CFR 574.3 (continued)


- *Eligible State* has 1,500 cumulative cases of AIDS (outside eligible EMSAs) and approved Consolidated Plan



HOPWA Formula Funds: Eligible Applicants

24 CFR 574.100


- States and qualifying cities
- HUD notifies eligible states and qualifying cities of
 - Eligibility
 - Allocation amounts
 - EMSA service area



HOPWA Formula Funds: Responsibilities


24 CFR 574.120

- Grantees must serve the entire EMSA and address needs of eligible persons
- Must have an approved Consolidated Plan, covering citizen participation, needs assessments, multi-year strategic planning for HUD and other sources, one-year action plans for new funding
- HUD notifies eligible states and qualifying cities of eligibility and allocation amount



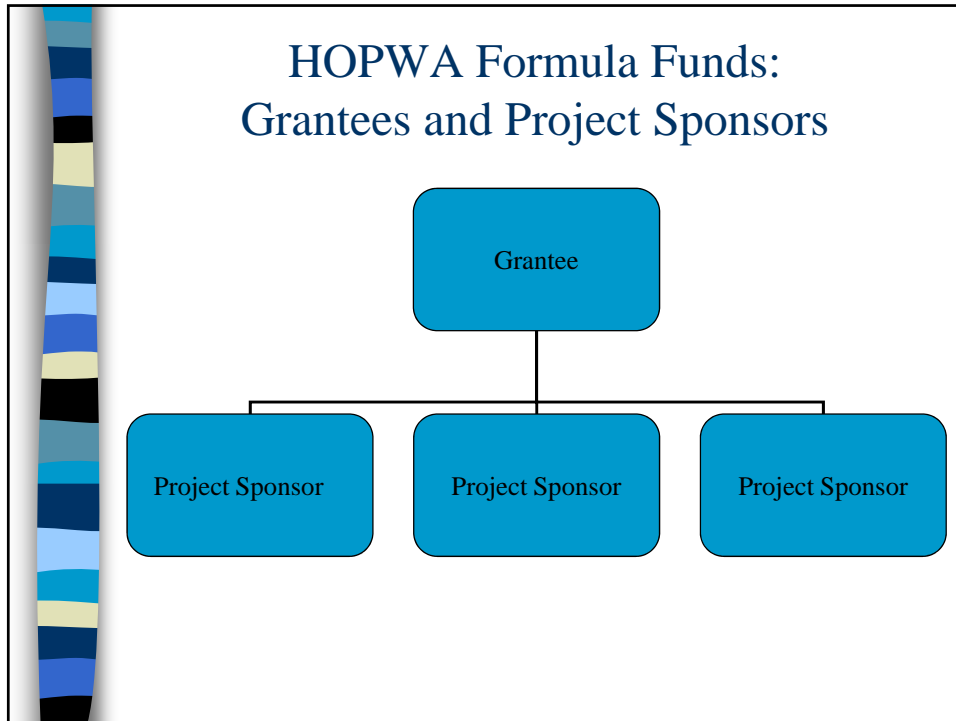
HOPWA Formula Funds: Formula Allocations

- Eligible “formula” areas must have:
 - At least 1,500 cumulative cases of AIDS reported as of March 31st of the previous year
 - Population of at least 500,000 in metropolitan areas
 - HUD-approved Consolidated Plan
- Ten states do not receive any HOPWA formula funds:
 - ME, NH, VT, WV, SD, ND, MT, WY, ID, AK, NE



HOPWA Formula Funds: Formula Allocations (continued)

- See 24 CFR 574.130
- 90% of total HOPWA funding is available through “formula grants” to states and EMSAs
 - FY 2007 formula funding is \$286.1 million
- 75% of “formula” is awarded to states and EMSAs based on cumulative AIDS cases
- 25% of “formula” is awarded as a bonus to EMSAs with a higher than the average per capita incidence of AIDS reported in the previous year



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- HOPWA Formula Funds:
Grantees and Project Sponsors (continued)
- Project Sponsor is a nonprofit or governmental housing authority that receives funds under a contract with a grantee to carry out eligible activities
 - Each grantee awards funds to Project Sponsors based on needs and priorities outlined in Consolidated Plan and Action Plan
 - Grantees monitor and oversee Project Sponsors and collect performance data
- The text is positioned to the right of a vertical decorative bar with horizontal stripes in shades of blue, black, and yellow.

HOPWA Competitive Program

- Definitions & Eligible Applicants
- Funding
- Responsibilities

Competitive Grants: Definitions


SuperNOFA – HUD’s notice of funding availability (NOFA) process conducted each year

- HUD releases its annual competitive funding through the SuperNOFA process
- Award procedures and selection criteria are found in the General Section/Program Section of the SuperNOFA
- Each year the requirements change, so reviewing the SuperNOFA is critical if seeking competitive funding.



Competitive Grants: Funding and Eligible Applicants

- 10% of funds are available through “competitive grants” to states, local governments, and non-profit organizations
- Eligible activities or available amounts of funding may be limited by the SuperNOFA



Competitive Grants: Funding and Eligible Applicants (continued)

- Since 2002, Appropriation Act requires that priority be given to the renewal of expiring HOPWA competitive grants that have successfully undertaken permanent supportive housing projects
 - Grant procedures described in CPD Notice 07-13
 - Establish budget line to continue the housing programs



Competitive Grants: Funding and Eligible Applicants (continued)


- Funds remaining after renewals distributed under SuperNOFA; 2007 SuperNOFA makes funding available for two types of projects:
 - New Long-term Projects: Funding for housing activities to be conducted by states, balance of state areas outside of EMSAs, and units of local government that are not eligible to receive formula grants
 - New and Continuing Special Projects of National Significance (SPNS): Housing and supportive services projects that have the potential to be effective models in addressing needs of low-income persons with HIV/AIDS



Competitive Grants: Requirements


HOPWA competitive grantees must comply with:

- HOPWA Regulations
- SuperNOFA
- Grant agreements
- Annual Program Report (APR) submission



Technical Assistance Funding

- 1-2% of total competitive funding is set aside for technical assistance (TA), training, and monitoring activities:
 - Sound management of HUD grants
 - Performance measurement and data collection
 - Establishing or operating housing subsidy programs and community residences
 - Needs assessment and planning activities
- Non-profit and for-profit organizations are eligible to apply for funding (2005 SuperNOFA)
- Assistance is available to HOPWA grantees, Project Sponsors, or potential HOPWA applicants

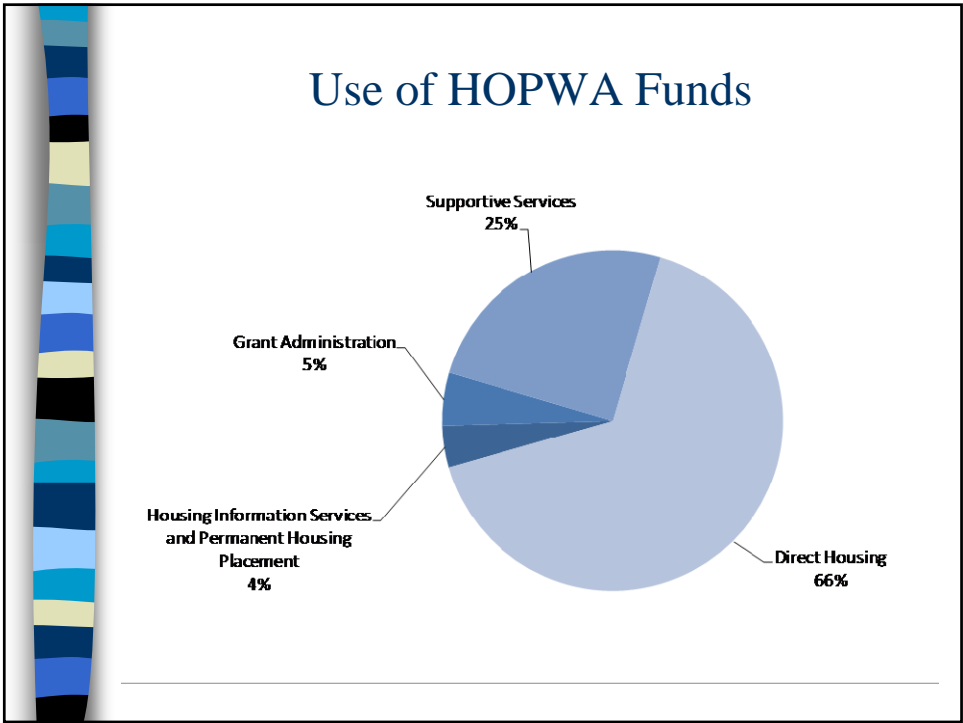


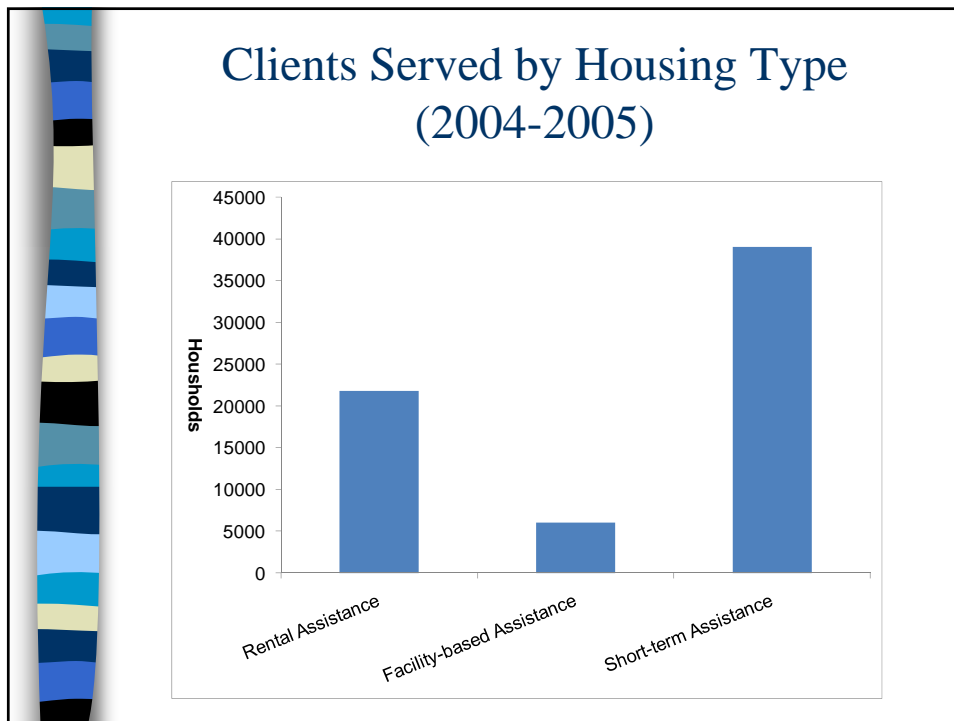
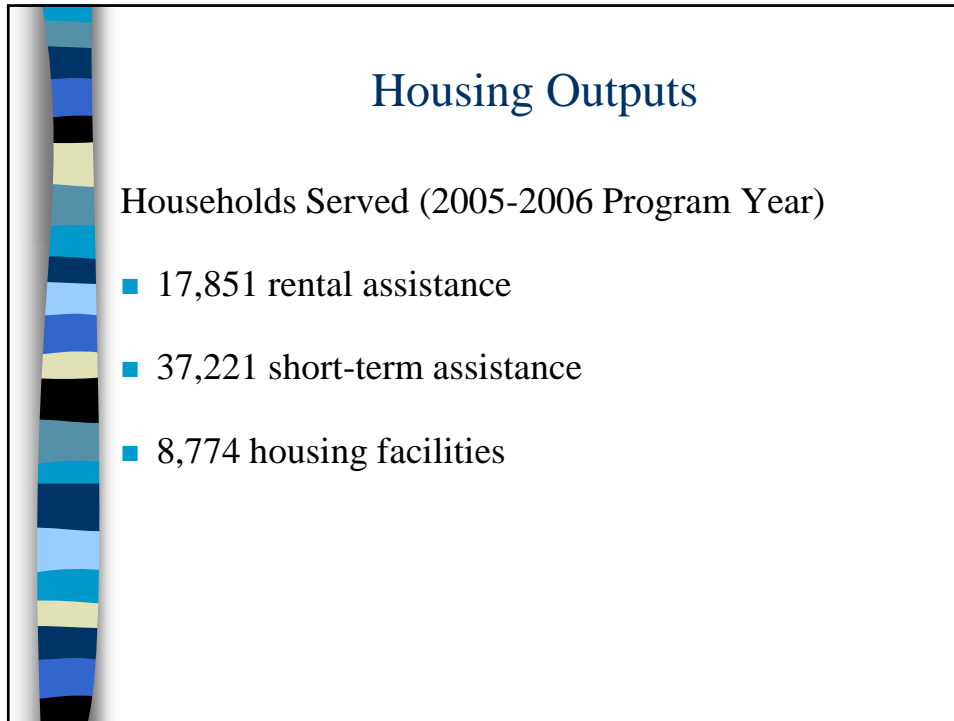
Grants Management

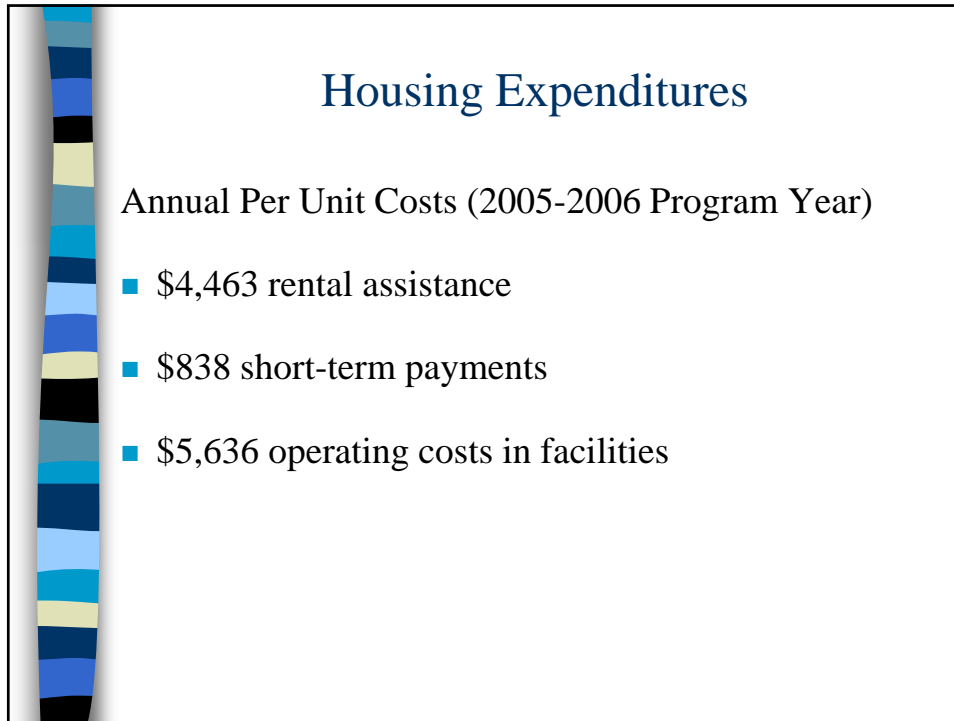
- Formula: 121 grants (81 cities, 1 county, 39 states)
- Competitive: 85 active grants
- Technical Assistance: 2 national and 3 regional; 1 performance reporting
- Project Sponsors: approximately 500 non-profits and a few housing agencies

Obligation & Expenditure Requirements

- **Obligation Requirements**
 - FY07 formula and TA grants must be obligated by 9/27/2008 or cancelled by statutory limit (2 years)
 - FY07 competitive grants must be obligated by 9/30/2009 or cancelled by statutory limit (3 years)
- **Expenditure Requirements**
 - Competitive and TA grants have 3-year grant agreements; extension of up to 12 months may be approved by Field Office
 - FY07 grants have a 5-year maximum or cancelled by statute







Client Household Outcomes by Service Type (2005-2006)


Outcome	Rental Assistance	Facility-based Housing	Short-term Assistance
Stable	90%	75%	36%
Temporary	0%	5%	12%
Unstable	4%	13%	4%
TBD	6%	7%	46%

PART 3 - How is HOPWA Used?

- HOPWA Statute and Regulations
- Definitions
- Eligible Activities


HOPWA Law and Regulations

- AIDS Housing Opportunity Act
 - Publication L 101-625.100 Statute 4375; 42 U.S.C. 12901
- Code of Federal Regulations, HUD
 - 24 CFR Part 574: HOPWA
 - 24 CFR Part 9: Consolidated Plan
- What is the statute? What are the regulations? Why is this important to us?




HOPWA Regulations

- Subpart A – General
 - 574.3 - Definitions (Eligible person, family, State, City, Sponsor)
- Subpart B – Formula Entitlements
 - 574.100 Eligible Applicants
 - 574.100 Overview of Formula Allocations
 - 574.120 Responsibility of applicant to serve EMSA
 - 574.130 Formula Allocations
 - 574.190 Reallocation of grant amounts




HOPWA Regulations (continued)

- Subpart C - Competitive Grants
 - 574.200 Amounts available for competitive grants
 - 574.210 Eligible applicants
 - 574.240 Application Requirements
 - 574.260 Amendments




HOPWA Regulations (continued)

- Subpart D - Uses of Grant Funds
 - 574.300 Eligible Activities
 - Housing information
 - Resource identification
 - Acquisition/Rehab
 - New Construction
 - Project or tenant based rental assistance
 - Short-term rent
 - Supportive services
 - Operating costs
 - Technical assistance
 - Administrative
 - Other Activities




HOPWA Regulations (continued)

- Subpart D (continued) –
 - 574.300 (c) religious organizations
 - 574.310 – General Standards for Eligible Housing Activities
 - 574.310 – (a)(1) services, linkage, no health services.
 - 574.310 – (b) HQS (Housing Quality Standards) Review List
 - 574.310 – (d) resident rent
 - 574.310 – (e) surviving members
 - 574.320 – Additional standards for rental assistance
 - 574.330 – Additional standards for short-term supported housing
 - 574.340 Additional standards for community residences




HOPWA Regulations (continued)

- Subpart E – Special Responsibilities
 - 574.400 – Prohibition of substitution of funds
 - 574.410 – Grantee ensures capacity of Project Sponsors
 - 574.420 – Cooperation with other government agencies and jurisdictions
 - 574.430 – Fee prohibition
 - 574.440 – Confidentiality
 - 574.450 – Financial Records




HOPWA Regulations (continued)

- Subpart F – Grant Administration
 - 574.500 – Responsibility for grant administration
 - 574.510 – Environmental Requirements
 - 574.520 – Performance Reports
 - 574.530 - Record keeping
 - 574.540 – Deobligation of funds
- Subpart G – Other Federal Requirements
 - 574.603 – 574.655
 - OMB Circulars




Definitions

- AIDS
 - Disease of AIDS
 - Any conditions resulting from the etiologic agent for AIDS
 - HIV Infection




Definitions (continued)

- Eligible person – a person with AIDS or a related disease who is a low income person and the person's family
- Family – 2 or more people who are related or important to care and well being and surviving members of an eligible person's family




Definitions (continued)

- Low Income – below 80% of median
- Project Sponsor – non-profit or local government agency that receives funds through contracts with a grantee
- Grantee – state or local government receiving funds from HUD




(1) Housing Information Services

- Information and referral services to assist eligible persons with locating, acquiring, financing, and maintaining housing, including:
 - Housing counseling
 - Fair housing information
 - Housing information and referral
 - Housing search and assistance




(2) Resource Identification

- “To establish, coordinate, and develop housing assistance resources”
- Activities may include:
 - Housing research and needs assessment
 - Outreach and relationship-building with landlords
 - Costs involved in creating brochures
 - Web resources
 - Staff time to locate and identify affordable housing vacancies



(3) Acquisition, Rehabilitation, Conversion, Lease, and Repair


- Includes:
 - Facilities that provide housing (may or may not provide services onsite)
 - Lease of existing facility
 - Independent apartments or shared residences
- Rehabilitation must bring facility up to current ADA standards
- Facilities must provide housing to PWA’s for at least 10 years



(4) New Construction

- Single Room Occupancy (SRO)
- Community Residences*
 - Including multi-unit family dwellings that must provide a high-level, service-enriched environment


* See 24 CFR 574.340 for Additional Standards for Community Residences



Short-Term Supported Housing*

- Facilities to provide temporary shelter
 - May be hotel, motel, or shelter facility
- May provide residence to any individual for 60 days during any 6-month period
 - The 60 days do not have to be consecutive

*Not STRMU
*See 24 CFR 574.330 Additional standards for short-term supportive housing




(5) Supportive Services

- Services that complement the provision of housing assistance to beneficiaries
- Includes, but not limited to:
 - Health Services
 - Mental Health Care
 - Assessment and Case Management
 - Permanent housing placement
 - Drug and Alcohol Abuse Treatment and Counseling
 - Child Daycare
 - Adult Daycare




(5) Supportive Services (continued)

- Nutritional Services
- Intensive Care
- Assistance Securing Benefits
- Transportation
- Translation Services
- Clothing
- Peer Support Groups
- Personal Assistance




Permanent Housing Placement

- Supportive Service – reported separately
- Help establish new residency where ongoing occupancy is expected to continue
- Can cover:
 - Costs associated with locating housing
 - Housing referral (to decent, safe, and sanitary housing)
 - Tenant counseling/understanding leases/mediation
 - Secure utilities
 - Placement costs
 - Application fees/credit checks
 - Reasonable security deposits (NTE 2 months rent)
 - Deposits need to be tracked and returned to program




Permanent Housing Placement (continued)

- Costs/activities not allowed:
 - Housing supplies
 - Smoke alarms
 - Standard furnishings
 - Minor repairs
 - Moving costs




(6) Operating Costs for Housing

- Property maintenance and upkeep
- Security measures
- Insurance
- Utility costs
- Furnishings and equipment
- Operating supplies
- Other incidental expenses



(7) Project- or Tenant-Based Rental Assistance

- A rental subsidy pays the difference between Fair Market Rent, or other rent standard, and the tenant's contribution
- Project-based is tied to a specific project
- Tenant-based is tied to the individual and operates similar to a Housing Choice Voucher (Section 8) with fewer restrictions



(7) Project- or Tenant-Based Rental Assistance (continued)

- Habitability standards apply (less stringent than Section 8 requirements)
- Tenant pays the higher of 10% gross income or 30% adjusted gross income
- Income re-certifications are required annually to assure current eligibility
- Additional standards are found at 24 CFR 574.320



(8) Short-Term Rent, Mortgage, & Utility Assistance (STRMU)

- Homeless prevention, needs-based assistance
- Rent, mortgage, utility assistance for up to 21 weeks in a 52-week period (weeks not consecutive)
- FMRs and Rent Reasonableness do not strictly apply
- Assistance must be paid to third party (i.e. mortgage, landlord, utility company)
- Amount of assistance varies depending on funds available, tenant need, program guidelines (caps may be applied)
- Additional standards for STRMU at 24 CFR 574.330




(9) Technical Assistance (Local)

- Used in establishing and operating a community residence:
 - Planning expenses
 - Pre-development or pre-construction expenses
 - Costs relating to community outreach and education activities related to AIDS or related diseases for persons residing in proximity to a community residence
- Note: TA as mentioned in the regulations is not the same as that provided by national HOPWA TA providers; such activities are authorized through the HOPWA appropriation acts each year



(10) Administrative Expenses


- Defined at 24 CFR 574.3
 - *Administrative costs mean cost for general management, oversight, coordination, evaluation, and reporting on eligible activities. Such costs do not include costs directly related to carrying out eligible activities, since those costs are eligible as part of the activity delivery costs of such activities.*
- Limits
 - 3% allowable for HOPWA grantee
 - 7% allowable for Project Sponsor
 - Competitive grantees who also carry out program activities are limited to no more than 3%



(10) Administrative Expenses (continued)

Administrative expenses include:

- Staff for program coordination, management, and evaluation
- Travel for official business
- Contracted services (legal, audit, accounting)
- Goods and services needed for administration
 - Equipment rental and purchase
 - Insurance and utilities



(10) Administrative Expenses (continued)


Ineligible administrative costs:

- Development of staff *professional credentials*
- General government expenses (e.g. building costs)
- *Substitution* for general funds
- Tasks duplicated by grantee and Project Sponsor

Part 4 - Additional Standards


- General Standards of Housing Activities
- Additional standards for Rental Assistance
- Additional Standards for Short-term Housing
- Additional Standards for Community Residences
- Other Standards

General Housing Standards (24 CFR 574.310)




Service Providers and Health Care Costs

- Ensure that qualified service providers make available services to persons receiving housing
- Health care costs cannot be covered by HOPWA if they can reasonably be covered by the state or federal program, insurance, or other health care entity




Housing Quality Standards

- Acquisition, rehab, new construction, lease, project or tenant based rental assistance or operating costs
- Housing Quality Standards (574.310 (b)) – though not as stringent as Section 8 units must meet HQS which includes:
 - Meet state and local housing codes
 - Habitability Standards include
 - Structurally sound
 - Accessible
 - Space for securing personal items
 - Good air quality
 - Adequate heat
 - Efficient light and electricity
 - Suitable kitchen facilities
 - Sanitary condition




Minimum Use Periods

- New construction, substantial rehab, or acquisition minimum of 10 years
- Non-substantial rehabilitation or repair of a building minimum of 5 years



Rent Payments


- Resident Rent Payments (24 CFR 574.310 (d))*
- Applies to both project-based and tenant-based rental
- Clients must pay rent unless it is short-term housing or a services facility



Rent Payments (continued)

- Tenants must pay a rent, including utilities, an amount higher of:
 1. 30% of family's monthly adjusted income
 - Adjustment factors include age, medical expenses, size of family, child care, and other factors as detailed at 24 CFR 5.609(a)
 - Additionally, expense deductions as outlined in 24 CFR 5.611 (a) must be taken and for eligible person the disallowance of earned income as provided in 24 CFR 5.617 or
 2. 10% of family's monthly gross income or
 3. The portion of welfare assistance specifically designated for housing costs

*See Income and Resident Rent Calculation Worksheet



Termination and Violation


Termination of Assistance (574.310 (e)):

- Surviving family members – may receive housing assistance and/or supportive services; grantee can set a grace period not exceeding one year
- Violation of requirements – clients may be terminated for failing to meet program or occupancy requirements; grantees must have a formal process following due process law, including written notice, allowance for tenant review and rebuttal, written notice of final decision

Additional Standards for Rental Assistance (24 CFR 574.320)

Additional Standards

- *Maximum Subsidy* – difference between rent standard or reasonable rent and the calculated client's contribution
 - Subsidy cannot be higher than the difference between the rent standard and client contribution
- *Rent Standard* – includes HUD published FMR the HUD-approved community-wide exception rent (usually approved by HUD with a PHA)
 - Grantees may increase the rent standard by 10% for up to 20% of the units.



Additional Standards *(continued)*


- *Rent Reasonableness* – rents paid must be comparable to market rate rents
- *Shared Housing* – rent is adjusted based on a pro rata share of the private space used by the family (e.g., if the unit has 3 bedrooms and the family is using 1 bedroom, the rent would be 1/3 of the 3-bedroom rent standard); shared housing arrangements should be voluntary.*

* See Shared Housing Form

Additional Standards for Short-term Supported Housing (24 CFR 574.330)




Additional guidance on STRMU:
CPD Notice 06-07




Short-term Housing

- Two Types:
 - Short-term Rent, Mortgage and Utility Payments
 - Short-term Supported Housing – facilities to provide temporary shelter




Additional Standards for Short-term Facilities

- Housing for up to 60 days during 6-month period (574.330 (a))
- May not provide shelter at any one time to more than 50 families or individuals (574.330 (b))
- Must, to the extent practicable, provide each individual living in the housing access to permanent housing or a living environment suitable to needs (574.330 (c))
- Provision of supportive services (574.330 (d))
- Access to case management services. (574.330 (e)).




Short Term Rent Mortgage and Utility Assistance (STRMU)

- Prevents homelessness by keeping households in current dwelling
- Provides rent, mortgage, and/or utility support for no more than 21 weeks in a 52-week period
- Assistance may be subject to further limitation by grantees




STRMU (continued)

- Cannot be used for first month's rent or security deposit; cannot assist homeless people
- Assistance must be paid to third party (i.e. mortgage, landlord, utility company); no cash payments
- Amount of assistance may vary depending on funds available, tenant needs, and program guidelines. (Caps may be applied)
- Annual reporting counts households assisted not payments



Additional Standards for STRMU

- STRMU limited to 21 weeks in a 52-week period (574.330 (a))
- Programs shall provide as reasonable supportive services specifically designed to maintain the individuals in their assisted residence (574.330 (d))
- Program participants should also have access to case management services (574.330 (e))



STRMU and HOPWA Outcome

- Temporary solution
- Housing Services Plan key to achieving stability
- Maintain connections to key health and supportive services



STRMU Tenancy Requirements

- Must already be housed to be eligible
- Must be named tenant or provide other evidence of legal residency
- Account in their name with utility or proof of responsibility to make payments (cancelled checks/money orders)
- Owner of mortgaged property (deed, title insurance policy, mortgage holder)
- Default/late payment notice is not required



Needs-Based Program

- Needs must be documented through verifiable documents – client should have no other means for payment and support will prevent homelessness
- If 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
- STRMU cannot be provided if assistance is also being received from any other HOPWA, federal, state, or local housing subsidy program




Documentation of Housing Need

- Inability to make monthly payment
 - Record of monthly housing costs vs. income
 - Limited available financial resources (savings, bank accounts, etc.)
 - HIV/AIDS health conditions and impacts on resources




Capped Payments

- Grantees may allow project sponsors to cap STRMU assistance
- Caps must reflect FMRs and/or rent reasonableness so that support is sufficient to prevent continuing housing crisis
- Caps must be applied in uniform, consistent, and non-discriminatory manner
- If household receives max amount under cap, it will be considered a full 21 weeks of assistance




Capped Payments and Consolidated Plans

- Cap limit must be specified in Annual Action Plans
- Must be assessed by grantee and monitored for consistency
- Assessment must be included in Annual Report to HUD




Suitable Housing Units – STRMU

- Required to assess whether unit is decent, safe, and sanitary
- HQS not required initially if needed to prevent homelessness and unit is decent and safe
- Continued occupancy should require meeting of HQS
- Any deficiencies in unit should be addressed in Housing Service Plan



Calculating 21-Week Period


- Statute limits assistance to 21 weeks in any 52-week period
- Count calendar days of assistance with maximum being 147 (21 x 7)
 - Can equate one month with 4 weeks of assistance yielding a maximum total of 5 months and 1 week of assistance
 - Can precisely measure number of weeks in month (e.g., 4.3 weeks for 30 day month)
- Methodology must be consistent



Calculating Annual Eligible Period


All project sponsors must use same method each year to determine annual eligible period

- Standard annual period
 - Grantee's operating year
 - Calendar year
- Separate period of eligibility for each client
 - Year starts when client first receives STRMU assistance




Rent and Utilities in 21 Weeks

- Housing costs are generally monthly; utility billing periods often include parts of 2 calendar months
- Provided that utilities and rent expenses are reasonably coincidental (at least 14 days of overlap), the monthly housing cost period can be used to determine the 21-week period



Not Covered by STRMU

- Personal items (grooming, clothing, home and personal furnishings, care for pets)
- Vehicle maintenance and repairs
- Financial assistance/consumer credit or entertainment activities
- Phone services (basic phone service and long distance – in rural areas – may be covered as supportive service when needed to access necessary services)



Mobile Homes, Trailers

Can be assisted under STRMU in limited circumstances:

- Basis for assistance must be rent, mortgage, or utility bill
- Mobile homes/trailers with wheels and capable of relocating are personal property and not eligible
- Must be attached to earth, connected to permanent utilities, and compliant with local guidelines for mobile homes

Additional Standards for Community Residences (24 CFR 574.330)





Community Residences

- *A multiunit residence designed for eligible persons to provide a lower cost residential alternative to institutional care; to prevent or delay the need for such care; to provide a permanent or transitional residential setting with appropriate services to enhance the quality of life for those who are unable to live independently; and to enable such persons to participate as fully as possible in community life.*
--(574.340 (a))



Required Certifications

- Service Agreement – certifying the services will be provided
- Adequate funding – certifying that grantee has adequate funding for services in place or statement to the needed services and how those services will be funded
- Capability – certifying that the grantee or project sponsor is certified to provide the services

Other HOPWA Standards 24 CFR 574.400-655



Grantee Responsibilities

- See 574.400
- Prohibition of substitution of funds
- Capacity – grantees shall ensure that a Project Sponsor has capacity to do the work
- Cooperation – coordination with state and local efforts
- Prohibition of fees for clients
- Financial record keeping for monitoring
- Compliance with grant agreement and monitoring of Project Sponsors



Confidentiality

HOPWA regulations require that grantees and project sponsors ensure the confidentiality of both the name of any individual assisted by HOPWA and any other information regarding individuals receiving assistance.

24 CFR 574.440 Confidentiality. “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.”



Other Federal Requirements

- See 574.600 also 24 CFR Part 5
 - Nondiscrimination and Equal Opportunity (i.e. fair housing)
 - Applicability of OMB Circulars
 - Conflict of interest
 - Displacement, relocation, and real property acquisition
 - Lead-based paint
 - Flood insurance protection
 - Audit
 - Wage rates

Part 5 - Questions and Answers



For More Information



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or visit

<http://www.collaborative-solutions.net>
for more information on available trainings.

More HOPWA Information

- For more information on AIDS housing programs and resources, training opportunities, publications, and links, please visit:
 - Collaborative Solutions, Inc.
<http://www.collaborative-solutions.net>
 - HUD's HOPWA homepage at
<http://www.hud.gov/offices/cpd/aidshousing>
 - AIDS Housing of Washington's web site at
<http://aidshousing.org>
 - Training Development Associates (TDA, Inc.)
<http://www.tdainc.org/>