HOPWA Program Manual

ihcda

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Acronyms Used in Manual

AIDS: Acquired Immunodeficiency Syndrome
AMI: Area Median Income
CAPER: Consolidated Annual Performance Evaluation Report
CON Plan: Consolidated Plan
DBA: Doing Business As
EIN: Employer Identification Number
FBHA: Facility-Based Housing Assistance
FMR: Fair Market Rent
HIC: Homeless Inventory Count
HIPAA: Health Insurance Portability and Accountability Act
HIV: Human Immunodeficiency Virus
HMIS: Homeless Management Information System
HOPWA: Housing Opportunities for Persons With HIV/AIDS
HUD: U.S. Department of Housing and Urban Development
HUD-CPD: U.S. Department of Housing and Urban Development Office of Community Planning and Development
HUD-OHH: U.S. Department of Housing and Urban Development Office of HIV/Housing
IHCDA: Indiana Housing and Community Development Authority
IHCDA-CS: Indiana Housing and Community Development Authority Community Services
IN: Indiana
IRS: Internal Revenue Service
PBRA: Project Based Rental Assistance
PHP: Permanent Housing Placement
PII: Personal Identifying Information
PIT: Point-in-Time Count
RR: Rent Reasonableness
ROF: Return of Funds
RPC: Regional Planning Council
SNAP: Supplemental Nutrition Assistance Program
SSI: Supplemental Security Income
SSN: Social Security Number
STRMU: Short-Term Rent, Mortgage, and Utilities
TBRA: Tenant Based Rental Assistance
TIN: Tax Identification Number
VAWA: Violence Against Women Act
VSP: Victim Service Provider
WIC: Women, Infants, and Children (nutritional program)

Purpose of Manual

This manual contains a basic overview of the Indiana Housing and Community Development Authority (IHCDA) Housing Opportunities for Persons with AIDS (HOPWA) Program and its eligible activities and requirements. It is not intended to replace existing guidance produced by the U.S. Department of Housing and Urban Development (HUD). Additional program information can be found on the HUD Exchange HOPWA page.

This manual provides guidance to:

- IHCDA Project Sponsors for program administration; and
- IHCDA staff for program monitoring and technical assistance

Purpose of the HOPWA Program

Housing Opportunities for Persons with AIDS (HOPWA) is a grant-funded program that provides housing funding for non-profit agencies specializing in assisting Hoosiers living with HIV/AIDS and their families. The goal of the HOPWA program is to ensure that affordable housing options are available to low-income persons with HIV/AIDS and their families and to assist such persons in achieving and maintaining housing stability. By integrating housing and healthcare access, HOPWA provides interventions aimed at reducing homelessness and improving access to and engagement with HIV/AIDS treatment and care.

In 1992, the HOPWA program was established to provide housing assistance and supportive services for low-income people living with HIV and their families. This program came before many of the life-saving medications that exist today, and thus, was also envisioned as helping those with an AIDS diagnosis die with dignity. Now that life-saving medicines are available, HUD has switched the focus of HOPWA to “elevating and utilizing housing as an effective structural intervention in ending the HIV epidemic.” As the only federally funded program specifically addressing the housing needs of those living with HIV or AIDS and their families, increasing access to affordable housing and positive health outcomes are HOPWA’s main measures of success.

IHCDA’s HOPWA program is available within 78 of Indiana’s 92 counties. The remaining counties receive their funds through the City of Indianapolis and City of Cincinnati (OH). To receive HOPWA funding from IHCDA, a non-profit must adhere to specific requirements defined in IHCDA’s Request for Applications and Consolidated Plan (CONPlan) to HUD.

Project Sponsor Roles and Responsibilities

To successfully administer the HOPWA program, each Project Sponsor has a set of responsibilities divided between two functions: “Program Management and Service Delivery” and “Grants Administration.”

Program Management and Service Delivery Responsibilities:

A. Comply with all federal, state, and local regulations, policies, standards, and guidelines – including but not limited to:
    a. 2 CFR 200
    b. 24 CFR 574
    c. Additional Notices and Guidance from HUD-CPD Office, Office of HIV/Housing (OHH), and IHCDA
B. Ensure efficiency and effectiveness of HOPWA program:
    a. Enter client-level data on the Homeless Management Information System (HMIS), or in the case of clients who are survivors of domestic violence, DV ClientTrack.
    b. Comply with HOPWA rent standard and rent reasonableness requirements, property inspection requirements, and lead-based paint requirements outlined in this manual.
    c. Ensure that new and existing staff members are adequately trained in all aspects of HOPWA service delivery.
C. Execute Rental Assistance Payment Contracts with the tenants and landlords and ensure VAWA Lease Addendum containing current Lease Provisions Guidelines as required by HUD is executed by the tenants and landlords.
D. Ensure the existence of and compliance with internal policies regarding the following:
    a. Confidentiality of client-level personal and health status information
    b. Preventing the duplication of benefits for clients
    c. HOPWA services are administered without discrimination against members of protected classes as defined by Federal and State law and any published HUD rules and notices – includes but is not limited to: Fair Housing Act, Violence Against Women Act and its subsequent updates or amendments, Equal Access to Housing Final Rule, etc.
    d. Termination of assistance is done as a last resort

Grants Administrative Responsibilities:

A. Comply with all federal, state, and local regulations, policies, standards, and guidelines – including but not limited to:
    a. 2 CFR 200
    b. 24 CFR 574
    c. Additional Notices and Guidance from HUD-CPD Office, HUD Office of HIV/Housing (OHH), and IHCDA
B. Ensure successful grant utilization throughout the contracted term of your award.
    a. Have consistent internet access with regular e-mail availability and use a financial software system for accounting purposes that functions and operates according to generally accepted accounting principles or has designated an entity that will maintain such an accounting system.
    b. Track and maintain a spending plan for their annual funding that accounts for claim submission deadlines and the budget outlined in your award.
    c. Ensure that claim submission deadlines are met in a timely manner, or that approval to submit a claim beyond its original deadline has been obtained from a Community Services (CS) Staff Member.
    d. Complete HOPWA Financial Management Training prior to claiming down funds, which can be accessed through your HUD Exchange account: HUD Exchange Learn - HUD Exchange
C. Project Sponsors must file Internal Revenue Service (IRS) Form 1099 for TBRA, STRMU, FBHA, and PHP rent payments to individuals and partnerships. If a Project Sponsor makes rent payments of $600.00 or more to property owners in any calendar year, then they must report this to the IRS on form 1099-MISC, Box 1, "Rents" (Revenue Rule 88-53). To comply with this requirement, Project Sponsors must obtain the taxpayer identification number (TIN), social security number (SSN), or employer identification number (EIN) of all entities to which it will make rent payments.
    a. Rental assistance payments cannot be made directly to clients, but if the Project Sponsor pays a utility allowance to the client (which is allowable), then the client would need to report the income. Note: IHCDA does not prohibit utility allowance payments to clients, but we strongly encourage utilities are paid directly to the utility provider. Questions can be directed to your CS Grant Analyst.
D. Attend relevant webinars or in-person events hosted by IHCDA, such as the IHCDA Community Services Grants Team Kickoff Webinars, CS Team Quarterly Office Hours; and other IHCDA-hosted events that pertain to the HOPWA program.
E. Timely communication with IHCDA:
    a. Respond to award inquiries or documentation requests from IHCDA Community Services staff in a timely manner.
    b. Alert Grants Analyst of any issues affecting grant utilization.
    c. Needing approval for specific purchases or determining if expenses are eligible

F. Complete a bi-annual Program Income and Admin Spending Report due on the final day of every December and June.
G. Complete the following closeout paperwork in a timely manner:
    a. IHCDA Annual Closeout Form
    b. HUD's annual CAPER (Consolidated Annual Performance and Evaluation Report) – which will be distributed once HUD sends IHCDA the specialized file for each Project Sponsor.

Project Sponsor Requirements

The list below summarizes requirements that Project Sponsors should account for when utilizing their award:

1. **Confirming and documenting** client eligibility as detailed in this manual
2. Maintaining **Confidentiality of Client Information**
3. Complying with **Lead-Based Paint Requirements** and documenting exemptions detailed in 24 CFR 35
4. Entering data in **HMIS or DV Client Track** within 5 days of initial client intake or discharge
5. **Claiming Expenses** for eligible expenses via IHCDA Online
6. **Prevent or disclose** any potential Conflict of Interest impacting the administration of HOPWA assistance
7. **Administer** VAWA protections for eligible clients as needed
8. **Completing** forms and reports in a timely manner, such as the Program Income & Admin Spending Report, Consolidated Annual Performance Evaluation Report (CAPER), and IHCDA Annual Closeout Form
9. **Cooperating with** IHCDA's CS Compliance team as they monitor awards and **resolving** findings and concerns from CS Compliance team in a timely manner

Determining HOPWA Client Eligibility

To qualify for HOPWA assistance, client households must meet these eligibility criteria highlighted in the graphic below:

At least one person living with HIV or AIDS must be part of the household.

Client's household must be at or below 80% Area Median Income (AMI) as defined by HUD.

As the HOPWA Grantee for the Indiana Balance of State, IHCDA requires HOPWA clients and members of their household to be physically located within the Indiana Balance of State's jurisdiction while assistance is received.

While HOPWA clients may also meet any of the Categories of Homelessness illustrated in 24 CFR 576.2 or 24 CFR 578.3, meeting these categories is not a requirement to receive HOPWA assistance.

As detailed above, income eligibility is required for all forms of HOPWA assistance except for Housing Information Services.[1] To view HOPWA Income Limits for your area, please visit Income Limits | HUD USER.

[1] HUD Exchange, "Introduction to Rent Calculation for HOPWA Grantees", Introduction to Rent Calculation for HOPWA Grantees - HUD Exchange

1.1 Documenting Client Eligibility in HOPWA and Other Programs

If a client household is seeking assistance through multiple programs, Project Sponsors must ensure that prospective client households meet the eligibility requirements of each program they seek to receive services from.

Demonstrating Proof of HIV Status or AIDS Diagnosis: Self-verification is not sufficient for establishing eligibility in the HOPWA program. Similarly, neither a statement from a case manager nor demonstrating eligibility for related assistance like the Ryan White Part B program is sufficient by itself.

A client applying for HOPWA assistance must provide either a statement from a healthcare professional or document(s) containing test or lab results with clearly indicated HIV-positive status, both of which must be dated and signed by a medical provider or testing-site representative.

Project Sponsors are not required to *exclusively* use the Statement of HIV Verification Form. A signed and dated statement provided on the healthcare provider's stationery or standard form is also acceptable.

Documentation to show proof of status for HOPWA assistance should not require specialized medical knowledge to confirm HIV status or AIDS diagnosis. If test results require specialized medical knowledge to understand that the documents confirm proof of status, then that test result wouldn't be sufficient for establishing eligibility in the HOPWA program. If the document shows information that requires specialized medical knowledge *but* also clearly shows proof of status to those that do not have specialized medical knowledge, the documentation is acceptable for establishing eligibility in the HOPWA program.

Income Calculation: If the programs in question require households to be at a certain income level, Project Sponsors may use the same source documentation from clients to calculate income. Project Sponsors should consult with their Grantee and their resources for guidance on income limits and how to demonstrate eligibility for assistance.

Additional guidance on how to leverage HOPWA services alongside other grant-funded programs is provided in the "Leveraging vs. Duplication of Benefits" section of this manual.

Administering Assistance within the Indiana Balance of State (IN BoS): Clients receiving assistance through IHCDA's HOPWA program must be physically located within the Indiana Balance of State's jurisdiction. If a Project Sponsor receives HOPWA funding from multiple Grantees, Project Sponsors should take note of each Grantee's service area and ensure that their award is utilized in the correct service area. Questions can be sent to your Grants Analyst.

1.2 Calculating Annual Income

To calculate the annual income of each HOPWA household, Project Sponsors must determine the composition and characteristics of each household.[2] Knowing this information is important because it allows your team to identify relevant inclusions, exclusions, allowances, and deductions that the household qualifies for. Oftentimes, everyone residing with the client will be considered a "family member" unless they are a live-in aid, foster child, foster adult, or a roommate in a shared living situation.[3] If the member is a live-in aide, foster child, foster adult, or roommate in a shared living situation, that individual is considered a "household member."[4] Information on household composition should be collected at intake and during the annual income recertification period, as well as instances in which household composition has changed before the annual income recertification period.

Next, Project Sponsors need to note the type of income each household receives. Earned income may be part-time, full-time, seasonal, or sporadic. Benefit income may refer to Social Security SSI and SSDI, Vet, SSA, Pension, Retirement, etc. It is best practice to document that you've verified each income source via obtaining source documentation, third party written confirmation, third party oral confirmation, self-certification (may include signing a Zero Income Affidavit).[5] In cases where a household has allowable expenses for both the medical and disability assistance expense deduction, Project Sponsors should add the total disability assistance expenses amount and medical expenses amount together before subtracting the household's 3% of gross annual income.

Afterwards, Project Sponsors will now have the total annual adjusted income, which is also used to determine the proper rent and utility assistance rates under TBRA. To better understand how these rates are calculated, please view the "Calculating TBRA Rental Assistance" section of this manual.

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[2] The *composition* of a household refers to determining the number of individuals that currently live or will be living in the unit. The *characteristics* of a household refer to who is in the household (i.e. adults, adult full-time students, minors, foster children & foster adults, live-in aide, and any temporarily absent household member(s)).

[3] HUD does not require family members to be married, partnered, or related to one another, and per programmatic guidelines, neither Grantee nor Project Sponsor is permitted to require this. If the individual living with the client is a family member, you should include their income when determining the income eligibility of a household. Income is also included in household annual income unless specifically excluded via regulation or other forms of HUD guidance.

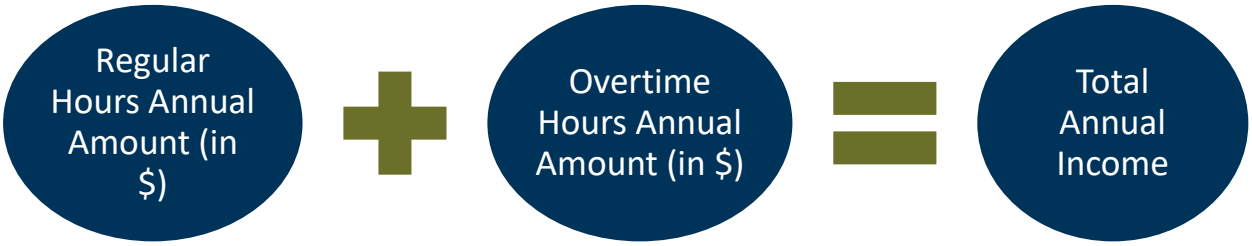
[4] If the individual is a household member, their income should *not* be included in household annual income. However, since the household member is physically present, they should be counted determining eligible unit size (i.e. number of bedrooms).

[5] In practice, a Project Sponsor could protect PII and obtain this information by requesting paystubs from client, or by contacting the employer and asking for documentation to verify their income for an "income-based housing assistance program." Both third party written and oral confirmation must be provided by a source outside the family. This would involve the Project Sponsor contacting the source via mail, fax, email, or phone and requesting the source to complete a verification form to be returned directly to the Project Sponsor. Additionally, self-certification should only be used in limited circumstances after attempts to obtain source documentation and third-party confirmation are unsuccessful. Self-certification must be signed and dated by both program staff and applicant/program participant. Unsuccessful attempts to obtain source documentation and third-party confirmation should be documented in a client's file.

Project Sponsors should use the Rent and Income Calculation form (found on IHCDA's HOPWA webpage) to calculate each client's income. To keep the integrity of the form's calculations, please be careful not to override any formulas presented in the form.

Past income history may be used in annual income calculation if it provides an accurate picture of what someone anticipates earning in the next 12 months. This will especially apply for those who receive irregular or cyclical income.

To calculate this rate, the following formula applies:



If there are known changes to income that will occur in the next 12 months, Project Sponsors may account for that when doing the initial annual income calculation. Calculate the amount before and after the change and add to receive the total. An interim recertification is not required when the known change occurs because it was already included when calculating annual income.

1.3 Note on Coordinated Entry

Given the HOPWA client eligibility criteria, HOPWA beneficiaries are not required to go through the Coordinated Entry process. Likewise, Project Sponsors are not required by HUD to accept Coordinated Entry referrals. However, when possible or appropriate, IHCDA strongly encourages Project Sponsors to accept coordinated entry referrals from the CE lead agencies in their respective regions or conduct coordinated entry assessments themselves. If you are interested in learning more or have additional questions about the use of CE in the HOPWA program, please contact our CoC Engagement team: cocnetwork@ihcda.in.gov.

The Collaborative Housing Assessment Tool (CHAT) was created in 2024 to standardize housing problem-solving practices across the IN BoS CoC, develop community-driven approaches that utilize local data and input, and ensure that the assessment experience employs a trauma-informed and person-centered focus in service provision. Individuals receiving a CHAT assessment are asked a series of questions about their needs and housing preferences. The responses are then evaluated, and referrals are made based on the wants and needs of the client. CHAT does have the ability to account for special populations such as veteran status, youth, history of DV, and presence of a disabling condition. Due to confidentiality laws, the CHAT does not include questions on clients' HIV/AIDS status.

Partners that provide housing resources should speak with their local CE Lead to ensure they are receiving referrals from CE, as needed. Individual grant funding sources such CoC or ESG dictate whether CE is required as a referral source. CE Lead information can be found on the regional structure webpage.

Maintaining Confidentiality of Client Information

Project Sponsors have a key responsibility to protect the privacy of client-level information when administering HOPWA assistance. This includes "personally identifying information," or PII - information that alone or in conjunction with other data, is likely to disclose a client household's identity, HIV status, and/or physical location. Project Sponsors must follow all applicable federal, state, and local laws and regulations, in addition to meeting HOPWA-specific requirements. HOPWA information is subject to confidentiality requirements, as mandated by Section 856 of the AIDS Housing Opportunity Act. The implementing HOPWA regulation, as set forth at 24 CFR 574.440, requires 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."

The table below illustrates which information is subject to HOPWA Confidentiality requirements.

Table 2: Information to Protect per HOPWA Confidentiality Requirements

Information Type	Subject to HOPWA Confidentiality Requirements?
First and Last Name	**YES**
HIV/AIDS Status	**YES**
Client eligibility documentation (i.e., medical documentation of HIV/AIDS diagnosis; proof of income; any CE assessments; referrals from health departments; etc.)	**YES**
Any data that alone, or in conjunction with other data, likely discloses a client's identity and/or location	**YES**

Examples of data to be mindful of may include but not be limited to: demographic data like race or ethnicity (which should be maintained per 24 CFR 574.530), service provision data, and personal information regarding the client household's circumstances. This especially impacts Project Sponsors with clients living in rural areas.

2.1 Regulations Regarding Confidentiality

The following section includes examples of laws and regulations that relate to confidentiality:

Table 3: Lists of Laws or Regulations and their Corresponding Explanations

Name of Law or Regulation Source	Explanation of Law or Regulation
AIDS Housing Opportunity Act of 1990	This act created and authorized the HOPWA program. It requires Grantees and Project Sponsors to protect the privacy of those receiving HOPWA assistance. Medical information on the HIV/AIDS status of clients is subject to confidentiality requirements, as mandated by Section 856 of the AIDS Housing Opportunity Act. (42 U.S.C. Ch. 131 §§ 12901-12912)
Americans with Disabilities Act; Section 504 of the Rehabilitation Act of 1973	Disability information obtained related to these two laws, including information regarding an employee's or program applicant's or participant's disability in requesting an reasonable accommodation, must generally be kept confidential. HUD regulations implementing Section 504 may be found at 24 CFR Part 8.
Confidentiality of Alcohol and Drug Abuse Patient Records	42 U.S.C § 290dd-2 requires, in part, that certain "records containing the identity, diagnosis, prognosis, or treatment of any patient relating to substance use disorder education, prevention, training, treatment, rehabilitation, or research must be kept confidential and be disclosed only" for certain purposes
Electronic Communications Privacy Act of 1986	Electronic communications are subject to confidentiality protections, including listening to, monitoring, or processing said communications (18 U.S.C. §§ 2510-2523).
Health Insurance Portability and Accountability Act (HIPAA) of 1996	Allows medical providers to share and transfer health information so long as client consent is obtained. Housing-only providers are not necessarily covered by HIPAA since the regulation applies to entities that also directly provide health care. The HIPAA Privacy Rule applies when all the following criteria are met: 1. The agency is a healthcare provider.

	2. The agency conducts certain covered transactions, such as billing an insurance provider. 3. The agency conducts these transactions electronically. More information on HIPAA is available at https://www.hhs.gov/hipaa/index.html.
HOPWA Regulation 24 CFR § 574.440	Both Grantees and Project Sponsors are required to ensure the confidentiality of the name of any individual assisted under this part and any other information regarding individuals receiving assistance.
IN Code § 4-1-10	Prohibits the disclosure of Social Security numbers.
IN Code § 4-1-11	Outlines required notices and disclosures of the unauthorized acquisition of computerized data that compromises the security, confidentiality or integrity of personal information maintained by a state or local agency. This includes data that IHCDA maintains which the Grantee or Project Sponsor can access. "Personal information" is defined as: An individual's first and last names, or first initial and last name, AND one (1) or more of the following data elements: a. Social Security number[6] b. A driver's license number or identification card number c. Account number, credit card number, debit card number, security code, access code, or password of an individual's financial account.

For more information on confidentiality requirements, please see the HOPWA Confidentiality User Guide.

[6] While the act does say the last 4 digits of an individual's social security number is not included, we still encourage Project Sponsors to protect this information if it's present.

2.2 Confidentiality of HIV/AIDS Diagnosis

Information on the HIV/AIDS status of clients is collected for the purpose of determining eligibility for HOPWA assistance. Consistent with statutory and regulatory requirements, Grantees and Project Sponsors must ensure that information is used for the limited purpose of establishing program eligibility. HIV/AIDS status, other forms of related client eligibility documentation related to income, and PII should only be accessible by qualified individuals who determine eligibility, provide support, or who otherwise oversee the provision of this federal assistance.

2.3 Agency-Level Policies and Practices on Confidentiality

All Project Sponsors must adopt procedures to ensure that all client information is handled and maintained in a confidential manner and in compliance with the requirements of all applicable state or federal laws, rules, and regulations, including, but not limited to, those relating to the release of Social Security numbers in I.C. § 4-1-10 and the notice of security breach provisions in I.C. § 4-1-11. Confidential information means any individually identifiable information – whether oral or written – about the clients who receive services and/or assistance under the HOPWA program.

Agency employees, agents, contractors, or others associated with the Project Sponsor agency requiring access to confidential client information must sign a confidentiality agreement. Any information obtained in connection with the examination, care, or services provided to any client shall not be disclosed without the client's signed consent. Note that there may be exceptions to client disclosure as required by law.

Care must be taken to assure confidentiality by having the Project Sponsor's correspondence, envelopes, and checks to landlord, utilities, etc., not reveal that the client is receiving assistance related to their HIV/AIDS diagnosis. This can be accomplished by establishing a checking account for the provision of HOPWA assistance using a neutral account name such as "Housing Fund" or "Assistance Fund." Additionally, many Project Sponsors may use a "Doing Business As" (DBA) designation. In these cases, Project Sponsors should ensure that their use of the DBA designation is consistent.

Project Sponsors must have written procedures and training efforts in place to maintain confidentiality. Precautions may include but are not limited to maintaining paper files in locked cabinets accessible only by designated individuals and installing security software for electronic files.

It is best practice for Project Sponsors to conduct periodic monitoring of these procedures and recurringly train staff on how to protect PII.

The Table below outlines the standard that Project Sponsors should use to develop their confidentiality policy.

Table 4: The Standard to an Excellent Confidentiality Policy.

Aspect of Confidentiality Accounted for	Standard for an Excellent Confidentiality Policy
Safeguarding PII	Clearly outlines how staff will gather, record, and store confidential information.
Laws & Regulations	Clearly highlights standards from relevant State and Federal laws and regulations that impact the operation of the HOPWA program and how to access regulatory language.
Consent and Release of Information	Thoroughly outlines how to obtain consent and navigate the consent process to release confidential information; explains how agency staff will act to ensure that laws or notices applicable to the HOPWA program are followed. Forms to be utilized for client consent are maintained.
Breach Protocols	Clearly highlights protocols for responding to breaches of confidentiality.
Data Collection Standards	Clearly highlights the agency's privacy standards related to data collection and use of participant information for program reports, such as HMIS data standards.

As in other areas involving sensitive or protected client information, questions should only be asked and recorded when a program or project has adequate data confidentiality protections in place. However, such actions shall not limit the collection of non-personal data necessary to demonstrate sound management of program resources, such as aggregated non-identifying information collected for program performance reports, or controlled access by an authorized governmental official to adequately conduct a program management monitoring or financial audit. Failure to comply with this section shall be considered a default of grant responsibilities, which, after notice, may give rise to suspension and/or loss of grant funds, as well as other potential actions or liability.

Prior to exchanging information with any other agency or entity, Project Sponsors must first obtain the Client's consent in writing. This document must include the following:

1. Which information is being disclosed and for what purpose.
2. The identity of relevant individuals or organizations to which confidential information may be disclosed.

3. A signature from the client which demonstrates consent to having their information exchanged amongst parties.

Project Sponsors should also obtain a signed HMIS consent form to enter Client information into HMIS, since client data includes medical information.

In the absence of specific written authorization, Project Sponsors may not disclose information identifying an individual's HIV status to any individual or organization unless the disclosure is required by law.

While not required, it is best practice to include expiration dates for Release of Information (ROI) and consent forms. Doing so ensures that clients have autonomy over the consent they are giving over their information.

Lead-Based Paint Requirements

Units associated with HOPWA assistance may be subject to Lead-Based Paint Requirements.

The procedures for HOPWA Habitability Standards inspections must include an inspector's review for compliance with the Lead-Based Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Subpart M (for tenant-based rental assistance) and Subpart H (for project-based rental assistance). Rental assistance program staff should also consult local or state laws that may apply and be more stringent than Federal law.

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at part 35, subparts A, B, H, J, K, M, and R of this part apply to HOPWA-assisted units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero-bedroom dwellings ("Target Housing"), subject to the exemptions set forth in 24 CFR 35.115.[7] Accordingly, the Project Sponsor must ensure that the following steps are being taken:

A. **For every HOPWA-assisted unit**: All prospective families are provided with the booklet entitled, "Protect Your Family from Lead in Your Home", except during transactions exempt from this requirement under 24 CFR 35.82.
B. **For every HOPWA-assisted unit that is Target Housing, except during transactions exempt under 24 CFR 35.82 (in addition to the activities in A. above):**
    1. Lead-Based Paint Exemption form is completed;
    2. For tenant-based rental assistance, HQS inspection is performed. Inspector uses Form HUD-52580 or Form HUD-52580-A. For project-based rental assistance, assessments and inspections are performed in accordance with 24 CFR 35.715 and 35.716 as applicable; and
    3. Inspector must attend HUD Visual Assessment training at the following link: https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm and submit certificate of completion to IHCDA.
C. **If child under six is in HOPWA-assisted unit and unit is Target Housing, except during transactions exempt under 24 CFR 35.82 (in addition to the activities in A. and B. above):**
    1. Disclosure of known lead-based paint hazards to prospective tenants before the lease is signed, **Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards (LBP Disclosure Form) is completed,**
    2. When applicable, the following steps are taken:
        a. The Project Sponsor and Landlord must execute an "Agreement for Ongoing Maintenance Activities related to Lead-Based Paint Requirements", drafted by IHCDA,
        b. Visual assessment for deteriorated paint or risk assessment is performed as applicable,

[7] In this context, "Target Housing" refers to any units that are subject to lead-based paint requirements. Project Sponsors may still administer HOPWA assistance for units that have zero bedrooms or are built after 1978 so long as they meet all other requirements outlined in this manual.

c. Deteriorated painted surfaces are stabilized, and hazard reduction activities are performed,
d. Tenants are notified each time such an activity is performed,
e. All work is conducted in accordance with HUD safe practices,
f. Records are maintained concerning paint stabilization by owners of deteriorated paint,
g. Clearance examinations are performed after paint stabilization and before re-occupancy,
h. Ongoing lead-based paint maintenance is performed.

3. If the Project Sponsor is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HOPWA-assisted unit has been identified as having an elevated blood lead level ("EBLL"), the Project Sponsor must complete an environmental investigation of unit and related activities in accordance with 24 CFR 35.1225 (tenant-based rental assistance) and 24 CFR 35.730 (project-based rental assistance) as applicable.
4. Reevaluation shall be conducted, and the Project Sponsor shall conduct interim controls of lead-based paint hazards found in the reevaluation,
5. Records are maintained concerning a child with an EBLL in a covered unit, and
6. As part of ongoing maintenance, asking each family to report deteriorated paint.

When administering STRMU assistance, lead-based paint requirements apply when all of the criteria above are met and STRMU assistance will continue for more than 100 consecutive days (24 CFR 35.115(a)(11)).

The Homeless Management Information System (HMIS)

The Homeless Management Information System ("HMIS") is a secure, local, electronic information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. Data regarding all individuals assisted with IHCDA's HOPWA funding must be entered into the Indiana Balance of State HMIS.

IHCDA Project Sponsors are required to enter and update participant data into the HMIS on a regular and consistent basis, which is defined as within five (5) days of client intake or discharge, as well as five days within any changes in HOPWA services rendered.[8] Entering data within this 5 day window greatly helps with completing the claims narrative and helps with reducing errors in the Project Sponsor's CAPER submission. For technical assistance, in-depth trainings, or general questions about the HMIS system, please contact IHCDA's HMIS Help Desk by emailing HMIShelpdesk@ihcda.in.gov.

Victim service providers are held to the same standards on entering data into the DV ClientTrack database for domestic violence service providers. If a Project Sponsor is a Victim Service Provider (VSP), they must enter their data into a closed, comparable database. VSPs cannot share data with each other – they must have a closed comparable database.[9] For non-VSP Project Sponsors, there is no prohibition to entering survivors into their shared HMIS except where (1) a survivor has requested not be in the system (2) a survivor has requested their information not be shared with other programs (restricted access to the record) or (3) a survivor has requested VAWA housing protections (should not be put in the notes, but kept in a paper file).

For technical assistance, training, or questions on the ClientTrack database, please contact IHCDA's VSP Comparable Help Desk by emailing DVHelpdesk@ihcda.in.gov.

IHCDA's HMIS team has a comprehensive webpage that includes a variety of resources to help subrecipients comply with requirements. Some examples of resources posted on IHCDA's HMIS webpage include:

- Recordings of Past Trainings
- User Agreements for Signature
- HUD-Issued HMIS Program Manuals
- How-To Guides (CAPER/APRs, CE, HIC/PIT, etc.)

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[8] We encourage Project Sponsors to review their process for completing data entries as part of their case management flow. This may include making changes in a Project Sponsor's policies and procedures and training staff on a recurring basis on how to best handle data entry and reporting tasks.

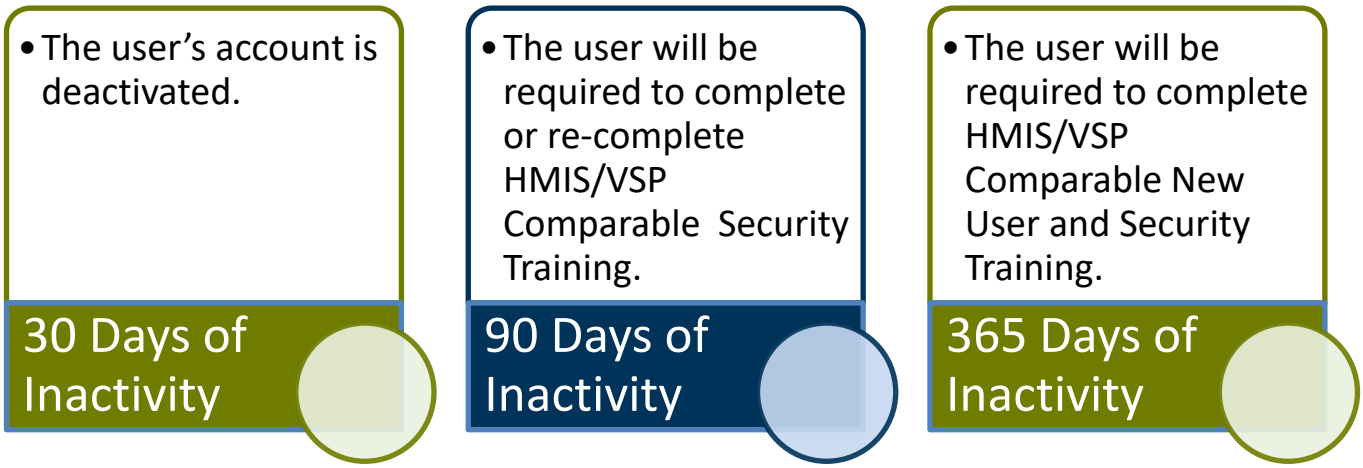
[9] According to HUD, a victim service provider is a private, non-profit organization that offers essential support and resources to individuals affected by crime, such as domestic violence, human trafficking, and other forms of victimization.

3.1 Understanding the HMIS and VSP Comparable Systems: Access

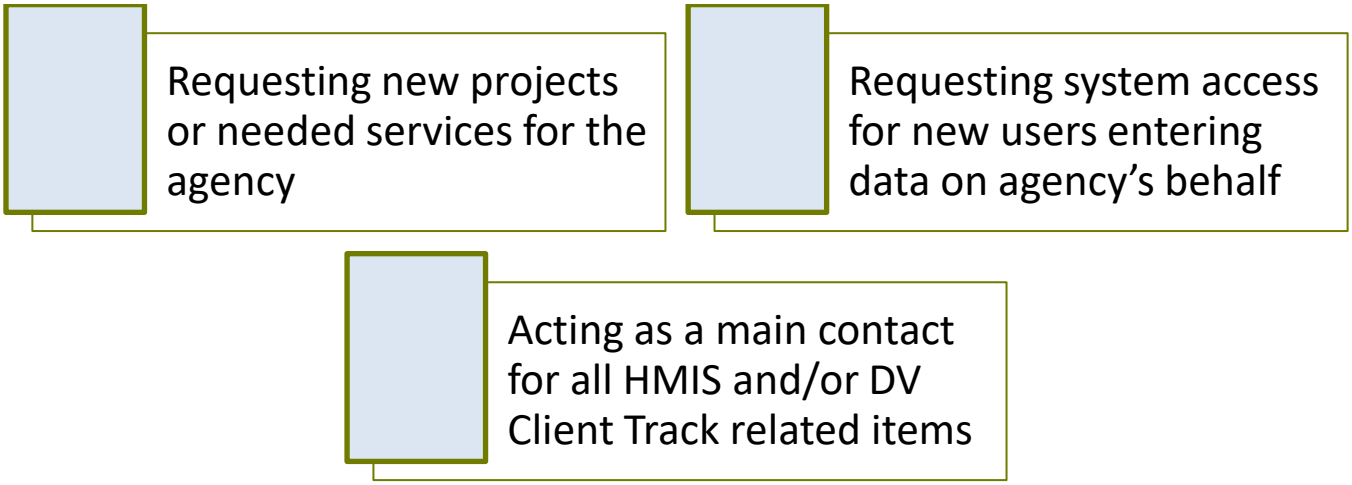
To obtain access to HMIS or DV Client Track, a new user must complete the following:

- HMIS New User OR VSP Comparable Training
- HMIS/VSP Comparable Security Training
- A Completed HMIS or DV Service Provider User Agreement
- Notify the HMIS Help Desk or DV Client Track Help Desk that all required trainings are complete, with the user agreement attached to the email.

There are different access roles that Project Sponsor staff members can have, such as Data Entry User and Site Administrator. Regardless of role, each staff member with access to HMIS or DV Client Track must be mindful of the following timelines associated with account activity:



Site Administrators are required to maintain an active HMIS or DV Client Track account. Additionally, each Subrecipient's HMIS Site Administrator is responsible for the following:



To transfer the role of Site Administrator to another staff member, please notify the HMIS Help Desk or VSP Comparable Help Desk for assistance.

3.2 Housing Inventory Count / Point-In-Time Count

As described by the HUD Exchange, "the Housing Inventory Count (HIC) is a point-in-time inventory of provider programs within a CoC that provide beds and units dedicated to serving people experiencing homelessness (and, for permanent housing projects, people who were homeless at entry, per the HUD homeless definition, categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing." The Point-in-Time (PIT) Count is a count of sheltered and unsheltered people experiencing homelessness on a single night in the last ten days in January.[10]

The PIT and HIC occur annually on the same night in the last 10 days of January and is routinely conducted by organizational staff, Regional PIT Coordinators [11], and hundreds of PIT Volunteers across the IN BoS. IHCDA provides support through training, office hours, educational videos, webinars, etc. for all 16 regions in the IN BoS.

If any or both of the following conditions apply, then the Project Sponsor in question must participate in the PIT and HIC Count:

1. Project Sponsor operates one (1) or more "Permanent Supportive Housing" or "Transitional Housing" projects on HMIS. This requirement applies to all HOPWA Project Sponsors funded through IHCDA. The beds and units in these projects are also dedicated to households meeting Category 1 or 4 of Homelessness as defined by HUD.[12] **Please note that STRMU-assisted clients and units should not be included in either count.**

2. Project Sponsor operates one or more of the following project types:
    a. Rapid Re-Housing (RRH)
    b. Emergency Shelter (ES)

The scope of responsibilities for full participation in the PIT and HIC are dependent on the type of project in operation. Those responsibilities are described below.

- **Emergency Shelter and Transitional Housing Projects**
    - **PIT:** Staff should run, review, and submit a Point-in-Time Report for each HMIS or DV Comparable participating project for the night of the PIT. The report(s) are due to HMISHelpdesk@ihcda.in.gov, or DVHelpdesk@ihcda.in.gov respectively, within two weeks following the PIT count. For any homeless dedicated projects that are not in HMIS or DV ClientTrack, the agency should coordinate with their local RPC and PIT Coordinator to ensure their project is counted.

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[10] Point-in-Time Count and Housing Inventory Count - HUD Exchange

[11] IHCDA Regional PIT Coordinators

[12] The definition of all Four Categories of Homelessness most relevantly applies within the scope of the CoC and ESG programs, because meeting a specific category of homelessness qualifies an individual or family for specific types of assistance. Those who meet the criteria defined in "Category 1" are considered literally homeless (lacking a fixed, regular and adequate nighttime residence as defined in 24 CFR 578.3). "Category 4" Homelessness refers to any individual or family fleeing domestic violence (24 CFR 578.3).

- **HIC:** Staff should submit project level information and bed inventory counts via JotForm survey for the project(s) by the end of the calendar year. Staff can access the link to the HIC survey by reaching out to CoCNetwork@ihcda.in.gov.

- **Rapid Re-Housing and Permanent Supportive Housing Projects**
  - **PIT:** Staff should run and review a Residential Housing Move in Date Report for the project(s) in the month of January each year ahead of the PIT count to identify any households that may be missing a housing move in date or who may need to be entered into or exited from the project.
  - **HIC:** Staff should submit project level information and bed inventory counts via JotForm survey for the project(s) by the end of the calendar year. Staff can access the link to the HIC survey by reaching out to CoCNetwork@ihcda.in.gov.

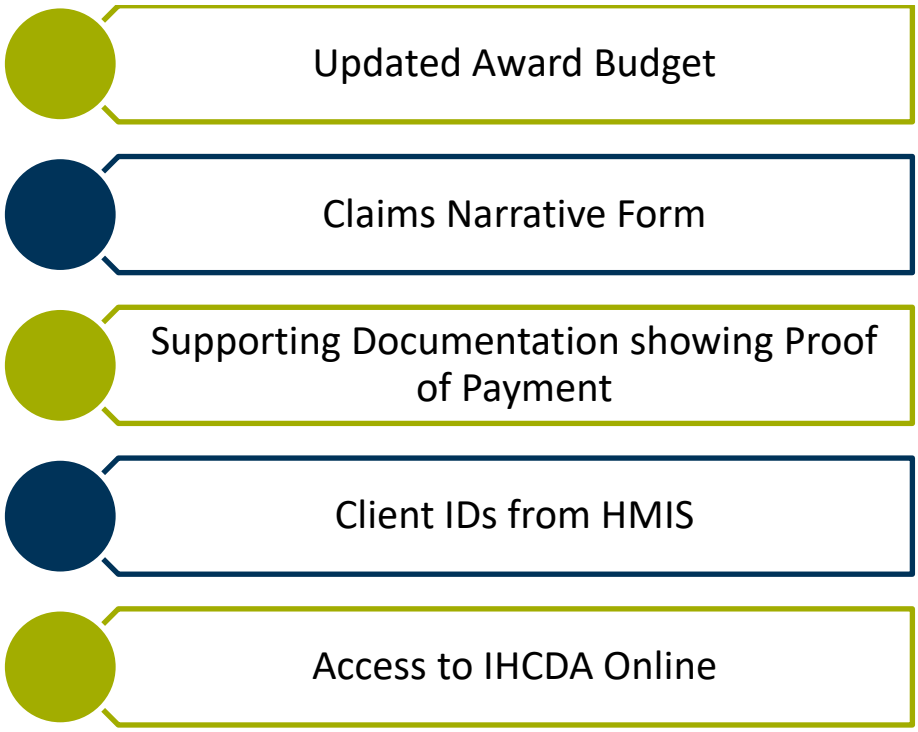
Staff operating any of the project types described above should also participate in discussions with their Regional Planning Council Chair/Co Chair and PIT Coordinator in their region to review PIT and HIC data. This may look like participating in RPC meetings and/or engaging in one-on-one email communications with these regional leadership members.

Supportive resources for the PIT/HIC and the reports described above can be found at the HMIS and DV ClientTrack Hub Page. If you have any questions about your responsibilities related to the PIT/HIC Counts, please contact IHCDA's HMIS team by emailing HMIShelpdesk@ihcda.in.gov

Claims Submissions

Consistent and timely claim submission is important to ensure timely reimbursement. To successfully utilize their HOPWA grant(s), Project Sponsors must submit claims for reimbursement to IHCDA for eligible program expenses. Claims must be submitted once a month (12 claims per operating year), on or before the 20th of each month, along with the completed claim form and supporting documentation.

The materials needed to successfully claim expenses are highlighted below:



Additional explanations and context surrounding these materials are outlined below:

1. ***Access to IHCDA Online.*** To request reimbursement from IHCDA, Project Sponsors must submit a claim through IHCDA Online. Every employee or contractor that submits a claim on behalf of a Project Sponsor must have their own account. Any staff member who needs access to the platform and/or needs training on how to operate the system should contact IHCDA's Claims team, please contact claims@ihcda.in.gov. Project Sponsors may also use the IHCDA Online Partner's Guide as an additional resource to understanding the website.

2. ***An updated award budget.*** Before submitting a claim, please confirm that funding in each budgetary line-item reflects your claim submission needs. If needed, Project Sponsors may amend work with their Analyst to amend their line-item budget on IHCDA Online. To amend a budget from FY2025 funding and beyond, please send your Grants Analyst a completed Budget Modification Form found on IHCDA's HOPWA webpage. To amend the budget for a FY2024 award and prior, please contact your Grants Analyst for assistance.

3. ***Claims Narrative Form*** found on IHCDA's HOPWA webpage.

4. ***Supporting documentation showing proof of payment*** for expenses incurred during the period for which a Project Sponsor is submitting claims.[13] This refers to any documentation showing that the Subrecipient paid for an expense in the month they are claiming for. Depending the expenses being claimed, Project Sponsors may need to include a copy of emails from IHCDA Staff (if the expense was specialized and required approval from the CS Grants Team, or if late claims approval was obtained), and other documents relevant to the specific claim. An in-depth description of required supporting documentation is outlined in Appendix I of this manual.

5. ***Timesheets of Project Sponsor Staff Members*** for any expenses directly associated with staff time. Information on what should be included in a timesheet can be found in the "Adequately Documenting Claimed Staff Time" section of this manual.

6. ***Client IDs*** for any expenses directly associated with serving clients. This refers to the 16-character identification of everyone benefiting from HOPWA assistance. Personally Identifiable Information (PII) of clients and/or household members should not be provided via IHCDA Online. Client files regarding program eligibility, abridged case notes, and other personal information should be logged into HMIS or DV ClientTrack.

TABLE 5: The following table shows a short description of the various statuses your claim could be in:

Status	Claim Submission	Claim Review	Accounting Review	ACH Transfer	Complete
Description	Claim created, not submitted, or returned to fix errors	Financial Operations team reviewing claim	Program Accounting team conducts final review of claim, draw needs to be made	Payment in process to account	Claim paid to account

Project Sponsors may use IHCDA Online to submit these four types of claims:

1. Reimbursement Claims (or "Grantee Payment" on IHCDA Online)
2. Repayment Claims (funding goes back to award)
3. Return of Funds Claims (funding goes back to IHCDA)
4. Adjustment Claims

[13] It is best practice to keep both proof of cost incurred, proof of payment, and proof of completed payment documentation in your records.

4.1 Reimbursement Claims

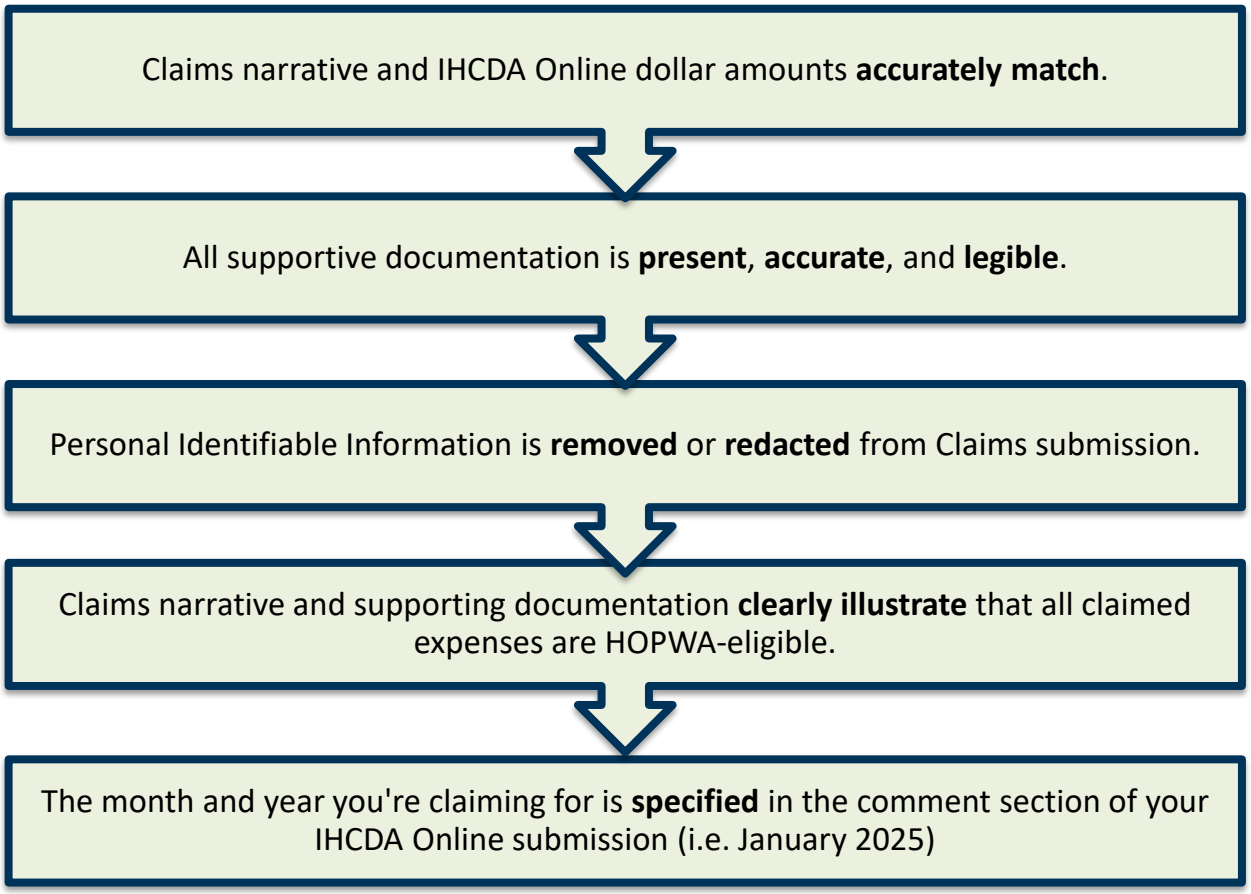
Every HOPWA grant is reimbursement-based; meaning, the Project Sponsor must spend their funds on HOPWA-eligible expenses before requesting reimbursement via IHCDA Online. When a Project Sponsor completes their claim submission via IHCDA Online, they are submitting a "reimbursement claim." When logged into IHCDA Online, this will show up as "Grantee Payment" as the transaction type.

IHCDA Financial Operations will review claims to ensure compliance with the federal government's Uniform Administrative Guidance 2 CFR 200 and guidance provided by CS Grants Team staff. Eligible expenses are outlined in the "HOPWA-Eligible Expenses" section of this manual. If you're not sure an expense is eligible, please contact your Grants Analyst or IHCDA Community Services: communityservices@ihcda.in.gov.

Submission of poor-quality claims will delay your payment. Upon notice of an error, IHCDA's Financial Operations team will deny the claim and ask Project Sponsors to revise the submission accordingly before resubmitting. Consistent errors in claims are reported to analysts and technical assistance is offered. However, if consistent errors persist after additional support is provided, an agency increases its likelihood of being selected for award monitoring from the compliance team. Funding may be jeopardized if Project Sponsor fails to adequately improve the quality of their claim submissions.

Late Claims Approval: Submitting a claim late (i.e., beyond the 20th of each month) always requires approval from the Grants Analyst. If the Grants Analyst approves the request to submit the claim(s) late, the Project Sponsor will receive an email documenting the approval and the new claims submission deadline. Always include the approval email as part of your supporting documentation when you submit a late claim. All late claims without documented approval will be denied. Approval of late claims is required any time a contract begins after the start date of funding, so that back-dated claims can catch-up a partner on their current expenses. Late claims approval for other reasons is done on a limited, case-by-case basis.

VISUAL 1: The visual below defines what makes a high-quality claim submission:



4.2 Repayment Claims

This claim type is submitted while an award contract is active. If approved, the funds from the repayment claim will be brought back to the Project Sponsor's award.

There are two prominent cases in which you may need to submit a repayment claim:

1. The IHCDA Community Services' Compliance team monitors your award while it is active, and they issue a finding that must be addressed.

2. The Project Sponsor themselves finds an error to correct during an award term.

With this claim type, Project Sponsors must mail IHCDA hard copy checks. If you do return funds, notify the grant analyst and claims email, and provide a copy of the amount and check number that was paid.

4.3 Return of Funds (ROF) Claims

This claim type is submitted after an award contract is expired. Like repayment claims, a ROF claim must be submitted in two instances: (1) the IHCDA Community Services Compliance

Team issues a finding that requires the Project Sponsor to send back funding; or (2) the Project Sponsor themselves identifies that funding has been overclaimed during their award term and seeks to correct the error. However, a ROF claim will instead be brought back to the Grantee for future reallocation or depending on timing, returned to the federal government.

With this claim type, we do not electronically return funds. Thus, Project Sponsors must mail IHCDA hard copy checks. If you do return funds, notify the Grants Analyst and IHCDA Claims (claims@ihcda.in.gov), and provide a copy of the amount and check number that was paid.

4.4 Adjustment Claims

In very limited circumstances during an award contracting term, Project Sponsors could submit an adjustment claim to take funding that was incorrectly claimed in one line item and correctly claim it in another line item.

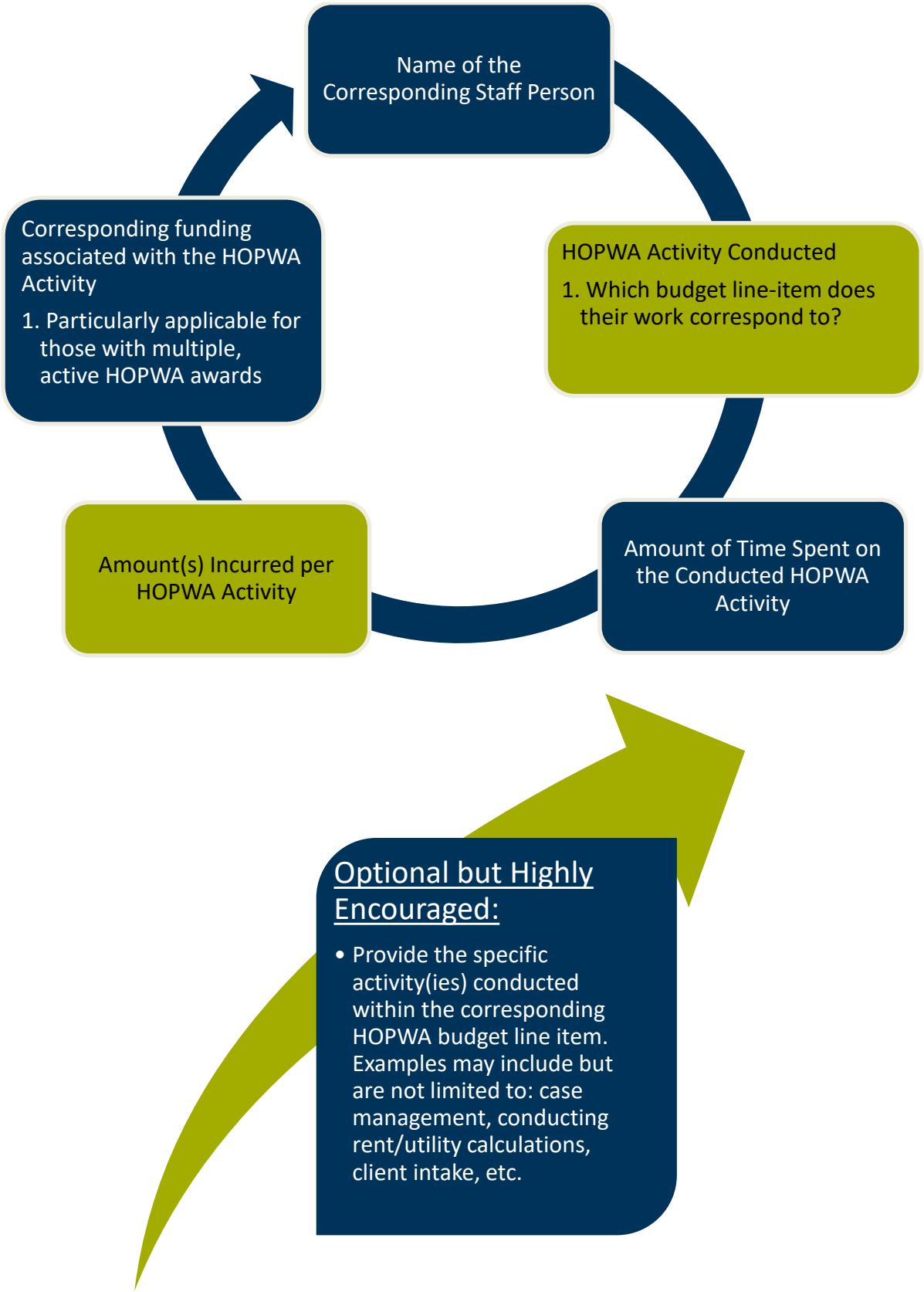
In the event you are unable to complete an adjustment claim, you will likely have to submit a repayment claim or ROF claim depending on the timing this issue was found. Questions about this should be directed to your Grants Analyst.

Adequately Documenting Claimed Staff Time

If a Project Sponsor intends to claim staff time and other associated costs, they must submit timesheets generated by either a Payroll system, an Excel/Word document, or letterhead.

The information outlined on the following page should be accounted for in a timesheet.

FIGURE 1: Information to Include in a Time Sheet


Name of the Corresponding Staff Person
HOPWA Activity Conducted
1. Which budget line-item does their work correspond to?
Amount of Time Spent on the Conducted HOPWA Activity
Amount(s) Incurred per HOPWA Activity
Corresponding funding associated with the HOPWA Activity
1. Particularly applicable for those with multiple, active HOPWA awards
Optional but Highly Encouraged:
• Provide the specific activity(ies) conducted within the corresponding HOPWA budget line item. Examples may include but are not limited to: case management, conducting rent/utility calculations, client intake, etc.

Note on Accrual-Based Reimbursement vs. Cashed-Based Reimbursement

IHCDA requires Project Sponsors to be consistent in the method to which they seek reimbursement. This consistency should be present in accordance with the Project Sponsor's policies regarding financial management.

Financial Management

Sound financial management practices and policies help ensure sound grants administration and program delivery. Project Sponsors should take note of the following:

1. As part of their accounting practices, Project Sponsors should have policies that align with **Generally Accepted Accounting Principles (GAAP)**; including but not limited to: a list of individuals and titles with access to any financial records and relevant tasks these individuals are responsible for, how financial records are stored and retained, how agency will respond to audit requests, where financial files are stored, how information is secured, etc.

2. Project Sponsors should plan and budget HOPWA fund expenditures to ensure they are available throughout the project year and are not spent prematurely. Reviewing current caseloads and expenditures by client, waiting lists, and past program performance can be used to plan services more effectively.

3. Project Sponsors should budget one-twelfth (1/12) of their annual HOPWA budget per month in claims. If a Project Sponsor under- or over-spends in any month, the Project Sponsor will be able to determine the balance of funds available for the coming months.

4. Project Sponsors should charge costs to the appropriate grant. Cost incurred during the year can be paid with funds from the HOPWA grant if they are allowable and the signed HOPWA award grant agreement covers the time period funds are expended.

No more than 7 percent of the Project Sponsor's HOPWA grant may be spent on administrative costs, which is also outlined in the "HOPWA-Eligible Expenses" section of this manual.

5.1 Required Financial Management Training Modules

IHCDA requires that any Project Sponsor staff responsible for submitting and/or approving claims complete two Financial Management Training modules offered through the HUD Exchange. A minimum of one staff member per Project Sponsor is required to have completed the trainings. The trainings are offered through modules and require a HUD Exchange account to access. The link to each training module is below:

- Financial Management 201: 2 CFR 200 Online Module
- Financial Management 201: HOPWA Online Module

Once the training is completed, Project Sponsors should email the certificate as issued by the HUD Exchange module to IHCDA Community Services.

5.2 Auditing Requirements

As part of their grant agreement with IHCDA, Project Sponsors are required to complete their IRS Tax Return Form 990. Depending on the total amount a Project Sponsor expends in federal funding, they may also be required to submit their Single Audit report / Audited Financial Statements report. The documentation is due within the earlier of thirty (30) days after receipt of the auditor's report, or nine (9) months after the end of the agency's fiscal year.

The Office of Management and Budget updated their guidance on the Single Audits threshold from $750,000 to $1,000,000, depending on when each Project Sponsor's fiscal year begins and ends. The $1,000,000 Single Audit threshold is effective for fiscal years that end on or after September 30, 2025. Instructions on how to submit these documents and the threshold that applies to your agency will be sent from IHCDA's Director of Internal Audit via email.

With the new Single Audit threshold in mind, the following applies:

1. If a Project Sponsor expends **more than $1,000,000** in federal funding, Project Sponsors must complete *both* a single audit in accordance with 2 CFR 200.514 for that year and its IRS Form 990.[14]
2. If a Project Sponsor expends **less than $1,000,000** in federal funding, the Project Sponsor must *only* submit its IRS Form 990.

To remain in good standing to continue receiving IHCDA HOPWA funding, Project Sponsors should comply with IHCDA's auditing reporting requests. Failure to consistently comply may result in a loss of future funding.

Program Income Reporting Requirements

Program Income refers to money that has been generated by the administration of a HUD-funded program. HOPWA program income must be spent as soon as possible and only be used for allowable activities/costs.

Examples of HOPWA Program Income include but may not be limited to:

1. Security deposits or utility deposit amounts returned to the program.
2. Rental payments made to unit(s) owned by the Project Sponsor (may most apply for those using facility-based assistance, TBRA, or master leasing[15])

Project Sponsors are required to report program income on a biannual basis (every December and June) even if the Project Sponsor has not generated program income. To comply with the requirement, Project Sponsors must complete the Program Income & Admin Spending Report form, which is found on IHCDA's HOPWA webpage.

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[14] 2 CFR 200.501(b)

[15] Master leasing refers to a type of lease that gives the lessee the right to control and sublease the property during the lease, while the owner retains the legal title. In many cases, the housing authority or service provider would be the lessee, allowing them to sublease the property to its clients.

Conflict of Interest

Reviewing for and preventing potential conflicts of interest is required for HOPWA Grantees and Project Sponsors. Conflicts of interest can occur at any phase of the award administration period. Federal regulations that govern conflict of interest include 24 CFR 574.625, which specifically pertains to the HOPWA program, and 2 CFR 200.318, which pertains to general procurement standards.

As defined by 24 CFR 574.625, a "conflict of interest" in the HOPWA program occurs when someone (an employee, agent, consultant, officer, or elected or appointed official of the grantee or Project Sponsor) is doing or has done the following during their tenure or for one year thereafter:

1. Is exercising or has exercised any functions or responsibilities with respect to assisted activities;

2. Who is or was in a position to participate in a decision-making process or gain inside information with regard to such activities; and

3. May obtain a financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has family or business ties.

With regards to general procurement standards, all agencies should "maintain and use documented procedures for procurement transactions under a Federal award or subaward, including for acquisition of property or services; as well as written standards of conduct covering organizational conflicts of interest." (2 CFR 200.318(a); 2 CFR 200.318(c)(2))

Regulatory language on conflict of interest specifically states that:

> No employee, officer, agent, or board member with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. (2 CFR 200.318(c))

6.1 Requesting a Conflict-of-Interest Exception

Upon written request, HUD may grant an exception to the Conflict-of-Interest policy outlined in 24 CFR 574.625(b) when "it determines that the exception will serve to further the purposes of the HOPWA program and the effective and efficient administration of the recipient's program or project." Project Sponsors can request an exception to the Conflict-of-Interest policy by submitting an explanation to IHCDA via email. Reach out the grant analyst about required information, and IHCDA will assist in submitting the request to HUD. HUD ultimately will determine if the exception is approved. Decisions on exemptions come from HUD's Program Office.

Please be mindful of the timing of your exemption request; IHCDA can communicate to HUD the urgency of your request as necessary and appropriate. Typically, decisions are final, and appeals are not considered or approved.

Listed in order, the process for requesting an exception is as follows:

1. The Project Sponsor must identify that HOPWA resources and services cannot be delivered to a client due to the restrictions in 24 CFR 574.625.

2. The Project Sponsor must submit to IHCDA two documents: (1) a letter explaining the nature of the conflict and why an exception is warranted; and (2) a letter from the Project Sponsor's attorney illustrating that the exception does not violate state or local laws. Please note that these documents should **not** include any personally identifying information of the individual seeking assistance.

    a. IHCDA will then examine whether the conflict-of-interest exception request meets the HUD standard outlined in 24 CFR 574.625 and notify the Project Sponsor the status of their request.

        i. If IHCDA determines that the Conflict-of-Interest exception request should be denied, IHCDA will provide the Project Sponsor with written notification of the denial and an explanation of the decision. Unless information was missing or a major extraneous factor was omitted from the original request by the Project Sponsor, an appeal will not be possible.

        ii. If IHCDA determines that the Conflict-of-Interest exception request should be accepted, IHCDA will then request HUD to grant an exception on the Project Sponsor's behalf. In this scenario, Project Sponsors may be asked to provide additional information or otherwise answer any questions that arise.

        iii. If IHCDA does engage with HUD, IHCDA will again notify Project Sponsors on the final status of their request. Please note that in the event of a denial, HUD is unlikely to accept appeals.

    b. Once IHCDA sends final notification on the results of their request, both IHCDA and the Project Sponsor must log the status of such in their files. Project Sponsor is then responsible for administering the exemption.

Any questions about Conflict of Interest should be directed to your Grants Analyst.

Violence Against Women Act (VAWA)

The Violence Against Women Act (VAWA) was originally enacted in 1994 to provide protections for survivors of domestic violence, dating violence, sexual assault and stalking. VAWA covers persons who have experienced domestic violence, dating violence, sexual assault (including in the context of human trafficking), or stalking. A person does not have to be in a current relationship or living with the person who is causing/ has caused them harm.

In cases of sexual assault or stalking, the individual committing the harm might not live with the victim or survivor; nor have an intimate relationship. However, there would need to be some indication via self-certification to show that the victim or survivor would otherwise face danger if they continue to reside in the HOPWA-assisted unit.

7.1 VAWA Protections in the HOPWA Program

Victims and survivors of domestic violence, dating violence, sexual assault, and stalking are protected from the following outcomes:

- Adverse decisions regarding housing assistance because VAWA violence/abuse was committed against them or related to VAWA violence/abuse
- Denial of admission or assistance
- Eviction and termination of assistance related to VAWA violence/abuse*
- Coercion, intimidation, threats, interfering with, or retaliation against a person exercising their VAWA rights

VAWA-qualifying victims and survivors also have rights afforded to them, such as the right to self-certify that abuse or violence defined in VAWA has occurred; as well as the ability to keep detailed information regarding the abuse confidential.[16]

The protections given under VAWA are demonstrated in the table shown below:

[16] Landlords/property owners may only request third party verification if there are instances of conflicting reports where both tenants in a unit name themselves as the victim and their co-tenant as the abusive partner.

Table 7: VAWA Protections Before and After HOPWA Assistance Commences

Protection Type	Actions	Additional Considerations
VAWA Notice of Occupancy Rights	**Prior to administering HOPWA assistance,** each Project Sponsor should provide the VAWA Notice of Occupancy Rights (Form HUD-5380) at the following times: • When admitting or providing rental assistance for a HOPWA-assisted unit • When denying admission or rental assistance to a HOPWA-assisted unit • With any notification of eviction from the HOPWA-assisted unit or notification of termination of rental assistance (24 CFR 574.604(d)).	
Lease Addendum	**Prior to administering HOPWA assistance**, an addendum to the lease should include: • VAWA rights and prohibitions • Tenant right to terminate their lease without penalty if they meet the conditions for a VAWA emergency transfer • Limits of VAWA: Tenants may still be evicted for non-VAWA related reasons • VAWA rights to confidential treatment of survivor data and information	
Lease Bifurcation	Allows a landlord or Project Sponsor to evict, remove, or otherwise terminate assistance to any individual tenant or lawful occupant of the housing who engages in criminal activity directly	As detailed in 24 CFR 5.2009, lease bifurcation can occur without regard to whether the household member engaging in criminal activity covered

	related to domestic violence, dating violence, sexual assault, or stalking. Allows tenant or lawful occupant who is the victim of the criminal activity to remain in the unit. This would be done without evicting, removing, terminating assistance to, or otherwise penalizing the victim**.**	under VAWA is a signatory to the lease. Survivors get a grace period: no less than 90 days and no more than 1 year for: • The survivor to establish eligibility for the unit in their own right; • The survivor to establish eligibility for another HUD covered program; **OR** • The survivor to move to new housing if found to not be eligible for assistance
Emergency Transfers / Emergency Transfer Plan	Required Elements of Plan: • **Define** tenants eligible for an emergency transfer • **Describe** how a tenant may request an emergency transfer • **Detail** the measure of any priority given to tenants who qualify for an emergency transfer under VAWA • **Incorporate** strict confidentiality measures • **Describe** the process for how an emergency transfer may occur HUD requires HOPWA Grantee to provide this for Project Sponsor implementation. To receive a copy of this plan, please email your Grants Analyst directly.	Client Eligibility for Emergency Transfers: • Occupant is a victim of domestic violence, dating violence, sexual assault, or stalking; **AND** • Expressly requests an Emergency Transfer; **AND** • Victim reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit; **OR** • If victim experienced sexual assault and reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same unit, or the sexual assault occurred on the premise during the 90-day period preceding the date of the request for transfer.

Project Sponsors must follow the documentation specifications in 24 CFR 5.2007, including the confidentiality requirements in 24 CFR 5.2007(c). The Project Sponsor is also responsible for determining on a case-by-case basis whether to provide new tenant-based rental assistance to a remaining tenant if lease bifurcation or an emergency transfer results in division of the household.

No person may be discriminated against because that person has opposed any act or practice made unlawful by VAWA, or because the person testified, assisted, or participated in any matter related to VAWA. Project Sponsors may not coerce, intimidate, threaten, or interfere with, or retaliate against any person in the exercise or enjoyment of, on account of the person having exercised or enjoyed, or on account of the person having aided or encouraged any other person in the exercise or enjoyment of, any rights or protections under VAWA, including: (1) intimidating or threatening any person because that person is assisting or encouraging a person entitled to claim the rights or protections under VAWA; and (2) retaliating against any person because that person has participated in any investigation or action to enforce VAWA.

7.2 HOPWA-Specific Requirements

VAWA regulatory compliance within the HOPWA program has been effective for all projects with a funding commitment date on or after December 16, 2016. As described in 24 CFR 574.604(b), VAWA requirements apply to the HOPWA grantee, Project Sponsor, or housing or facility owner, or manager. Within the HOPWA program, protections apply to the following line-items:

A. Housing assistance for acquisition, rehabilitation, conversion, lease, and repair of facilities to provide housing (24 CFR 574.604(b)(1)(i))

B. New construction (24 CFR 574.604(a)(1))

C. Operating costs (24 CFR 574.604(a)(1))

D. Tenant-based and project-based rental assistance (24 CFR 574.604(a)(1))

E. Community Residences (24 CFR 574.604(a)(1))

VAWA Requirements do not apply to STRMU or other short-term supported housing, as provided in 574.330, “except that no individual may be denied admission to or removed from the short-term supported housing on the basis or as a direct result of the fact that the individual is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual otherwise qualifies for admission or occupancy.”

To access VAWA protections, clients must submit their request to the Project Sponsor. The Project Sponsor will work with the housing owner or manager to facilitate protections on the tenant's behalf.

In 2013, major housing protections were added for survivors of domestic violence, dating violence, sexual assault, and stalking (24 CFR Part 5, Subpart L). Compliance under HOPWA

formula grants has been required since December 16, 2016, and considerations for emergency transfer provisions have been effective since June 14, 2017. The most recent amendments to VAWA were made in 2022. The sections below explain the most relevant 2022 amendments to administering the HOPWA program.

7.3 VAWA 2022 Amendment – Definition of Homelessness

As of 2022, the definition of homelessness has expanded to also refer to any individual or family who is:

1. Experiencing trauma or lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; **AND**

2. Has no other safe residence; **AND**

3. Lacks the resources to obtain other safe permanent housing.

The dangerous traumatic, or life-threatening conditions occurring do not have to be crimes. Moreover, in cases of sexual assault and stalking, the individual or family may be covered by VAWA if the person causing harm was a landlord, neighbor, or stranger.

7.4 VAWA 2022 Amendment – Definition of Domestic Violence

VAWA expanded the definition of domestic violence to include economic and technological abuse. As written in 34 USC § 12291(a)(12), the term "domestic violence" now reads as:

The term "domestic violence" includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding and, in the case of victim services, includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who—

A. Is a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
B. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
C. Shares a child in common with the victim; **OR**
D. Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

The definition of economic and technological abuse is highlighted in 34 U.S.C.12291(a)(13) and 34 U.S.C. 12291(a)(40) respectively.

VAWA now stipulates that landlords, homeowners, tenants, residents, occupants, and guests of, and applicants for, housing "shall have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance," and "shall not be penalized based on their requests for assistance or based on criminal activity of which they are a victim or otherwise not at fault under statutes, ordinances, regulations, or policies adopted or enforced by covered governmental entities." (34 U.S.C. 12495)

The prohibited penalties that this regulation refers to include:

- Actual or threatened assessment of monetary or criminal penalties, fines, or fees;
- Actual or threatened eviction;
- Actual or threatened refusal to rent or renew tenancy;
- Actual or threatened refusal to issue an occupancy permit or landlord permit; and
- Actual or threatened closure of the property, or designation of the property as a nuisance or a similarly negative designation.

Annual Grant Close Out and CAPER

IHCDA is required to submit all Consolidated Annual Performance Evaluation Reports (CAPERs) for Project Sponsors within ninety (90) days after the end of the grant period. Thus, IHCDA needs all Project Sponsors to accurately submit their materials on-time so that our jurisdiction does not miss HUD's deadline. The CAPER is a Microsoft Excel sheet provided by HUD TA Officers to IHCDA, which the Grants Analyst distributes them to Project Sponsors. HUD TA Officers will provide instructions on how to complete the report, which contains questions on programmatic impact across each form of assistance.

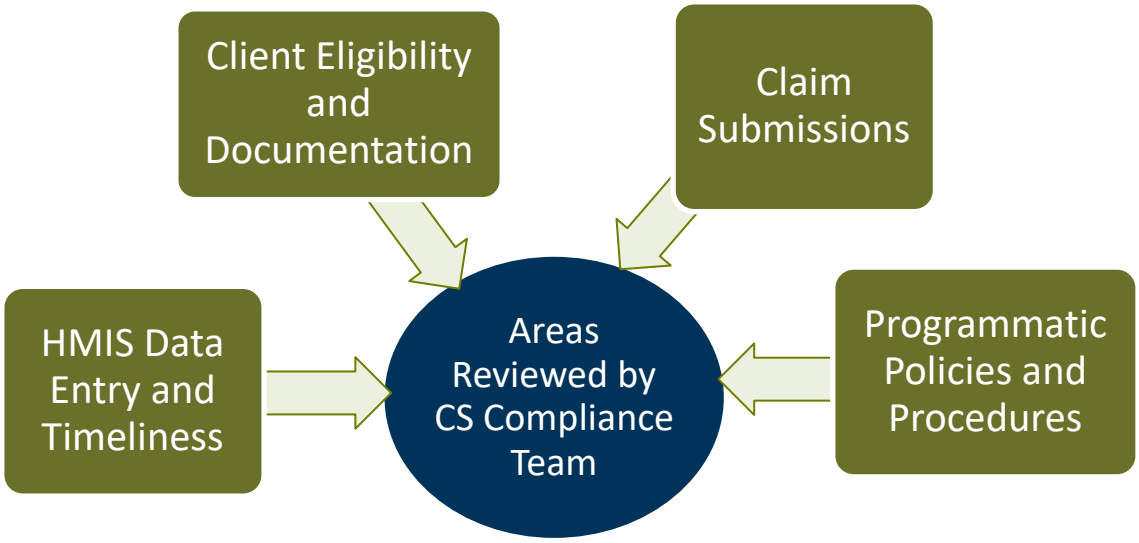
Dependent on capacity, IHCDA will work with HUD and/or HUD TA to host a webinar to explain how to complete each component of the CAPER. It is the Project Sponsor's responsibility to attend the training session if it is offered, complete the CAPER on time, and make any corrections requested by either IHCDA or HUD. If there are extenuating circumstances in which you need an extension, please email your Grants Analyst as soon as possible.

Timely and accurate submission of your CAPER is a requirement under the HOPWA grant agreement. If the agency does not comply in submitting this required report, it will be issued a finding from IHCDA and be ineligible to receive grant funding until the finding is resolved. Failure to complete the annual CAPER and any subsequent corrections in a timely manner will result in a pause in claim submissions, or a possible finding or concern issued by IHCDA Community Services' Compliance team. In some cases, failure to meet this requirement or address findings and/or concerns associated with the CAPER may result in an inability to receive future HOPWA funding. Questions about the CAPER and its requirements may be sent to your Grants Analyst.

Monitoring and Compliance

At some point during or after the award contracting period, Project Sponsors may see their HOPWA awards monitored for compliance with both HUD and IHCDA guidelines. HUD requires IHCDA to monitor a minimum of fifty percent (50%) of HOPWA Project Sponsors each year to ensure that HOPWA assistance is administered efficiently, effectively, and in accordance with HOPWA regulations and guidance. HUD also requires IHCDA to complete annual risk assessments for each award, which IHCDA uses to determine the monitoring schedule.

Figure 2: Sample List of Areas Reviewed by CS Compliance Team:



During the monitoring period, IHCDA's Community Services Program Monitors will notify the agency that monitoring is taking place. Program Monitors may also schedule a monitoring conference with Project Sponsor staff to talk through the monitoring process and ask additional questions. As indicated in the figure above, the team will review claims documentation, client records on HMIS, and other documentation as needed. Afterwards, the Compliance Team will issue the Project Sponsor a report, which will include any concerns or findings.[17] Project Sponsors will need to complete corrective actions to address the report's concerns and/or findings by the specified deadline.

Project Sponsors are expected to comply with requests for additional documentation and work with our team to resolve all monitoring findings or concerns. Failure to resolve concerns or findings in a timely manner may impact the Project Sponsors' ability to claim down on current grants and/or opportunities to receive future funding. All questions regarding monitoring should be directed to your CS Compliance Program Monitor.

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[17] Concerns refer to recommended actions to address weaknesses or potential problems. Findings refer to actions the agency must take to resolve the monitoring because of policy violations or practices that do not align with requirements.

HOPWA-Eligible Expenses

Laws, federal regulations, HUD notices and guidance, and IHCDA's priorities and guidance all influence what constitutes an eligible expense under the HOPWA program. IHCDA's HOPWA program allows Project Sponsors to fund the following line items:

1. Long-Term Rental Assistance
2. Long Term Program Delivery
3. Short Term Rent, Mortgage, and Utility Assistance (STRMU)
4. Short Term Program Delivery
5. Facility Operations or Facility-Based Assistance
6. Supportive Services
7. Permanent Housing Placement
8. Housing Information Services
9. Resource Identification
10. Administration

Please note that from the ten line-items listed above, only "Administration" has a spending cap. No more than 7% of your award may be utilized in the "Administration" line-item.

Information about eligible expenses within each line-item listed above is detailed in the following pages.

Long-Term Rental Assistance

Through this line item, Project Sponsors can provide ongoing tenant-based rental assistance (TBRA) and utility allowances to eligible client households. This line-item may be leveraged alongside multiple budget line-items, such as Permanent Housing Placement, Supportive Services, and Housing Information Services. On IHCDA Online and the HOPWA agreement, this line item is referred to as "Long-Term Rental Assistance." However, the remainder of this manual will refer to this line-item as "Tenant Based Rental Assistance," "TBRA," or "HOPWA TBRA".

The amount that can be administered to each household will depend on client/household income level, a locale's FMR (published here), and the amount of rental and utility costs in question. Utility allowance rates for use in the HOPWA program may be found here.

Clients who own a home or who are currently receiving or expect to receive a rental subsidy from other federal, state, or local sources are ineligible for HOPWA TBRA.

8.1 TBRA Requirements – Administrative

When administering HOPWA TBRA through IHCDA, the following requirements apply:

1. The unit selected by the Client must be a rental dwelling located within the jurisdiction of the IN Balance of State and most ideally, within your Region of Service.

2. The unit should meet the Program's Housing Quality Standards per 24 CFR 574.310(b).

3. The unit should meet the HOPWA rent standard and rent reasonableness requirements defined in the "HOPWA Rent Standard: FMR, and Rent Reasonableness Requirements" section of this manual.

4. After the Client finds a Unit, the Client must submit the following documents to the Project Sponsor:
    a. A "Request for Unit Approval" form, signed by the Landlord; and
    b. A copy of the Landlord's lease. If a Request for Unit Approval has not been submitted to the Recipient within sixty (60) days of the Rental Assistance Payment Contract (RAP) issue date, the RAP will expire, unless the Project Sponsor approves an extension.

5. After the Project Sponsor receives the Request for Unit Approval (RAP), the Unit will be inspected and the Recipient will review the Landlord's lease. If the Unit and the rent for the Unit meet the Program's requirements the Project Sponsor will notify the Landlord and the Client that it has approved the Unit. If the unit, rent, or lease cannot be approved, the Project Sponsor will provide the Landlord with an opportunity to correct the problem(s) or the Client can begin to look for another unit with the assistance of the Project Sponsor.

The Project Sponsor will work with the Landlord and the Client to execute all the necessary documents:

a. The Landlord and the Client must sign a lease that is approved by the Recipient.
b. The lease must have a term of at least one (1) year.[18]
c. The Landlord and the Project Sponsor must sign a RAP.
d. The Landlord and Client must sign IHCDA's Lease Addendum. The Landlord and Client should sign the VAWA lease addendum.
e. A Housing Quality Standard (HQS) inspection of the unit must be completed prior to Client move-in. It cannot be completed by the Landlord or someone employed by the Landlord. This form must be kept in the Client's file maintained by the Project Sponsor.

6. Once all necessary documents have been signed and the Client can move into the Unit, and the Tenant will begin making payments to the Landlord.

8.2 Calculating TBRA Assistance

A HOPWA household's rent contribution must be calculated before initial/move-in certification, the annual recertification period, and whenever a client's income has significantly changed.[19] To calculate a client household's rent contribution, Project Sponsors need to ensure that they have the following information:

- Amount of gross annual income
- Amount and type of income deductions, for which the household is eligible
- Amount of adjusted annual income
- Amount of the landlord requested rent (also known as contract rent)
- Amount of the utility allowance as defined by your local PHA's Utility Allowance Schedule (*only if* client is deemed responsible for cost of utilities)

[18] In limited cases, leases of less than one year may be allowed if that is a prevailing community practice.
[19] Initial certification occurs before moving into a new unit or beginning assistance in a current unit. Annual recertification occurs within one year from the initial or move-in certification. Move-in certification occurs when there either has been a change to the household composition and/or income and occurs sometime between the initial certification and annual recertification periods.

Once you have the information detailed above, additional calculation is required. The amount that a household must pay in rent and utilities must be the **highest value** of one of the following[20]:

Client Household pays the **HIGHEST** value of the following:

1. 30% of the family's monthly adjusted income
2. 10% of the family's monthly gross annual income
3. Welfare payment specifically designated to meet housing costs (i.e. welfare rent)

If a household has $0 income, then the client contribution towards rent will also be $0. Regarding utilities, a rebate for the cost of utilities will be credited to the applicable household.

8.3 TBRA Utility Allowances and Rebates

Every assisted household receiving HOPWA rental assistance or residing in permanent or transitional facility-based housing who is responsible for utilities supplied to their unit must have a utility allowance amount subtracted from the higher of 30% adjusted income, 10% gross monthly income, or the welfare rent to determine the final tenant portion of rent. Utility allowance amounts are obtained from your local public housing agency. Utility Allowance Schedules are based on the geographic location, unit type, utility types, and bedroom size. In some situations, when the utility allowance is subtracted from the tenant portion of the rent, this results in a negative amount - this amount represents a utility reimbursement/rebate.

To properly calculate the utility allowance administered for each client, Project Sponsors need to account for the base cost of each unit's rental costs and the household's total annual adjusted income discussed in the previous section.

8.4 TBRA Term Limits

HUD does not require Grantees or Project Sponsors to institute a limit on the amount of time a client may receive HOPWA TBRA. While neither federal nor state mandated time limits for HOPWA TBRA are currently in place, we understand that there may be situations in which a Project Sponsor opts to include term limits.

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[20] 24 CFR 574.310(d). Please note that this also applies to master leasing and permanent and transitional facility-based housing.

If the Project Sponsor identifies a need to put a term limit on the amount of time a client may receive assistance, the Project Sponsor needs to develop internal policies and procedures that clearly ensure the following:

1. That client households are connected to alternative housing resources or become self-sufficient once the Project Sponsor's term limit has passed
2. That no duplication of benefits occurs while assistance is administered [21]
3. That HOPWA services are administered without discrimination against members of protected classes defined by federal, state, and local laws and guidance[22]
4. Continue following regulations on ensuring confidentiality for all client personal and health status information
5. Ensure that termination of assistance is completed as a last resort

8.5 Ineligible TBRA Expenses

The following expenses are ineligible under TBRA:

1. Late fees caused by late payment to the Landlord by the Project Sponsor
2. Expenses due to repairs or damage
3. Pet deposits or related fees
4. Security deposits
5. Mortgage expenses
6. Rental costs for a unit owned by a relative of the client[23]

Long-Term Program Delivery

Staff time, fringe, and benefits costs associated with administering TBRA are eligible to be claimed under the "Long-Term Program Delivery" line item on IHCDA Online. To adequately claim time in this line-item, please see the "Adequately Documenting Claimed Staff Time" section of this manual.

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[21] In this context, "duplication of benefits" refers to cases in which a client is receiving housing assistance from more than one HUD-funded program (i.e. receiving HOPWA and CoC) and those programs are paying for the same costs. Per HUD requirements, duplication of benefits is prohibited and both Grantees and Project Sponsors must take action to prevent this by tracking expenditures.

[22] State legislation and federal legislation Title VII of the Civil Rights Act of 1964; Fair Housing Act

[23] See TBRA FAQ section of this manual for information on exceptions with regards to reasonable accommodations.

Short-Term Rent, Mortgage, and Utilities (STRMU)

STRMU assistance is intended to prevent homelessness, and, along with other HOPWA efforts, improve access to healthcare and other needed supports. STRMU's impact on the HOPWA program is similar to the homelessness prevention work done in the CoC and ESG programs. However, unlike CoC and ESG, STRMU allows Project Sponsors to pay for a client's mortgage (as opposed to *only* rent) during the eligible period of assistance.

With STRMU, Project Sponsors may pay for back or ongoing payments for rent, mortgage, or utilities. Project Sponsors may also pay client-owed late fees and other penalties. STRMU can be leveraged alongside multiple activities, such as Supportive Services and Housing Information Services.[24]

STRMU rent, mortgage, or utility payments do not follow the same calculation process that applies for other forms of rental assistance. STRMU pays the actual amount of each client's rent, mortgage, and/or utility bill.

Unlike TBRA, which does not have a federally mandated service term limit, clients may only receive STRMU assistance for up to 21 weeks in any 52-week period. Once this term limit has been reached, Project Sponsors should exit the client household from STRMU assistance and review next steps for the client household.

To better understand how TBRA and STRMU differ from each other, please refer to the HUD Exchange. Additional information on STRMU can be found on the IHCDA HOPWA webpage.

9.1 STRMU Eligibility Criteria

To receive STRMU assistance, households must meet all three of the following criteria:

1. A household must meet the basic HOPWA program eligibility criteria defined in the "HOPWA Client Eligibility" section of this manual.
2. A household must have legal residency in housing and/or be responsible for utility payments. For the purposes of administering the HOPWA program, this means ensuring that a RAP Agreement or documentation associated with a mortgage are present.
3. A household must demonstrate need for STRMU assistance by demonstrating:
    a. Other resources such as household income are not reasonably available to pay the housing costs.

[24] Unlike TBRA, STRMU is a short-term housing intervention for clients who are currently housed but at risk of losing housing. Additionally, since the client already lives in a unit/home, the probability of needing to leverage STRMU assistance with Permanent Housing Placement decreases. However, in cases where the client may need to move out of the STRMU-assisted unit to establish residency elsewhere, Permanent Housing Placement funding may be utilized to continuously house individuals and avoid homelessness.

b. Households must demonstrate that they do not have the resources to meet their rent, mortgage, or utility costs and that they would be at risk of homelessness in the absence of STRMU assistance.

c. STRMU assistance will alleviate any payment delinquency to avoid any eviction and result in (at least) temporary stability for that household.

d. The STRMU provider should also ensure that the household's ongoing housing needs are assessed in connection with the development of an individual housing and services plan for the household. STRMU providers should establish a reasonable basis to quantify and verify the need for STRMU assistance.

e. Project Sponsors must verify and document a participating household's inability to make required housing payments.

9.2 Ineligible STRMU Expenses

STRMU cannot be used to assist a household that already receives long-term rental assistance; nor can it be used for client households that are already experiencing homelessness. Additionally, STRMU funding cannot be used to pay for individual or collective hotel/motel stays, nor may it pay for costs associated with Emergency Shelter.[25]

Additionally, the following expenses are also ineligible under STRMU:

1. Realtor fees
2. Moving assistance
3. Security Deposit
4. Utility Deposit
5. First month's rent
6. Late fees caused by late payment to the Landlord by the Project Sponsor
7. Unsustainable recurring living costs
8. Auto repair expenses
9. Property taxes and insurance that are not part of a mortgage payment
10. Expenses associated with internet, cable or phone services
11. Assistance that occurs over a period of more than 21 weeks in any 52-week period.

Short Term Program Delivery

Staff time, fringe, and benefits costs associated with administering STRMU are eligible to be claimed under the "Short-Term Program Delivery" line item on IHCDA Online. To adequately claim time in this line-item, please see the "Adequately Documenting Claimed Staff Time" section of this manual.

[25] For client households who are experiencing homelessness, you could examine using other funding sources like ESG to pay for hotel/motel stays and using both Supportive Services and Housing Information Services funding as appropriate. HOPWA TBRA could place individuals/households into housing once a unit has been located.

Supportive Services

The Supportive Services expense category/budget line item allows Project Sponsors to help clients access additional services and resources that help them thrive. Supportive Services may be part of any HOPWA-assisted housing or be conducted independently of any housing activity.[26]

With a strong interrelationship existing between access to housing and health outcomes, Supportive Services can serve as a mechanism to maximize housing stability and prevent recurring homelessness. It is most effective when clients themselves are empowered to make decisions that best serve their needs. Supportive Services must be made available to all clients receiving HOPWA services.

NOTE: Since taking advantage of Supportive Services is optional, clients should not be penalized if they opt out of these services. Clients are not considered noncompliant with the HOPWA program when choosing to opt out of accessing Supportive Services. Clients that do not receive Supportive Services may receive rent and utility assistance if they still meet HOPWA eligibility criteria.

Eligible HOPWA Supportive Services include but are not limited to the following:

Table 8: Eligible Supportive Services Expenses per 24 CFR 574.300(b)(7)

Eligible Expense per 24 CFR 574.300(b)(7)	**Additional Explanation or Examples of Eligible Expense**
Healthcare (i.e. doctor visits, medicine, etc.)	This expense is only eligible for individuals living with HIV/AIDS.
Mental health treatment	
Assessment (i.e. case management)	Case management claimed in the Supportive Services line-item should be based on the work done associated with coordinating access to HOPWA Supportive Services.
Personal Assistance	Expense can pay for time spent assisting someone with a daily activity, similar to, or in conjunction with adult day care services. This is applicable for the qualifying head of household only.

[26] Project Sponsors who also receive CoC and/or ESG funding may find that expenses that are eligible under HOPWA Supportive Services can overlap with CoC and ESG. This can only work if the client is eligible for all programs in question. Please refer to the "Leveraging vs. Duplication of Benefits" section of this manual on considerations for integrating funding sources.

Nutritional Services	Food can be provided in forms such as vouchers for food banks and pantries, groceries, food boxes, and meal or grocery deliveries. Methods used to provide needed food and groceries to households may include the use of: Project Sponsors may also implement food delivery services for meals or groceries and coordinate food/grocery pick-up sites for clients or other similar methods based on resources and local needs. Grocery store cards may be eligible so long as there are methods in place to restrict purchases to food items only. ***Reminders from HUD:*** When providing grocery store or other cards to clients for food purchases, use careful tracking methods for food purchases and think through any policies needed on waste, fraud and abuse. ***IHCDA Recommendation:*** Think through an approach – or set of approaches - that best allows you to center/empower the client, meet the clients' needs, **and** document that all expenses you're claiming are eligible. Document your approach(es) in a policy.
Intensive care when required	A form of documentation (with third-party verification as much as possible) to verify need for intensive care needs to be in the client's file.
Drug and alcohol abuse treatment and counseling	This cost is eligible for the qualifying head of household only.
Childcare costs	This cost is eligible for minor dependents of the qualifying head of household only.
Assistance in gaining access to local, state, and federal government benefits and services, such as WIC, SNAP, Medicare & Medicaid, TANF, Social Security, etc.	

In additional guidance to grantees, HUD explains that the following are eligible under "Supportive Services". We have created a table on the next page to clearly outline those additional eligible expenses:

Table 9: Eligible Supportive Services Expenses Under Additional HUD Guidance to Grantees (via HOPWA 2010 Grantee Oversight Guide and Updated Guidance from HUD-CPD and HUD-TA)[27]

Eligible Expense per HUD Guidance	**Additional Explanation or Examples of Eligible Expense**
Transportation costs	Examples of qualifiable transportation expenses include: rideshare such as Lyft or Uber; taxis, lease of vehicle for staff to use for HOPWA-eligible activities, gas mileage Expenses associated with vehicle repairs as well as parking costs are ineligible in the HOPWA program. Additionally, expenses related to a client's personal vehicle (i.e. gasoline, maintenance) are not eligible.
Education	Training and education costs for books, supplies, tuition and bus tickets for school, special clothing or equipment, and the staff costs for training are allowable if not covered by other sources. Training and education should produce an income producing job in a reasonable amount of time.
Employment Assistance and training for persons living with HIV/AIDS	Employment assistance and training costs are much the same as educational costs - special clothing and apparatus that enable clients to work, bus tickets to get to work or meetings with an employment counselor. Employment counselor's job search time and materials are eligible costs - but costs cannot be paid by other sources.
Legal Services	This may only be administered for the qualifying head of household only. Issues should be related to housing access only. HOPWA should only be utilized when no other funding sources are available.
Life skills management	
Outreach	Within the HOPWA program, "outreach" refers to helping a current HOPWA client find necessary supportive services. This can include searching for or helping the client search for needed supportive services not currently offered by the Project Sponsor.

[27] In addition to The HOPWA 2010 Grantee Oversight Guide and updated guidance from HUD-CPD and HUD-TA, these other sources were used to inform the content in this table: HOPWA Office Hours: How to Deliver and Adapt Supportive Services - HUD Exchange and Get the Facts: HOPWA and COVID-19 Response: Supportive Services Q&A.

	Within the context of Supportive Services, "outreach" **does not** include outreach activities to new potential HOPWA clients and landlords, nor does it include systems-level outreach to expand housing resources, systems coordination, etc.
Cell phone purchase and cell service	This is allowed to enable provision of supportive services necessary to obtain and retain housing; and ensure client safety and stability such as for case management and mental health services. Any phones or wireless service plans should be owned by the Project Sponsor. Phones must be returned to the Project Sponsor when the need no longer exists.
Staff time, fringe, and benefits associated with administering Supportive Services	Guidance on how to claim for this are outlined in the "Claim Submissions" and "Appendix I" of this manual.
Other activities for supportive housing services with prior HUD approval	Project Sponsors must work with their Grants Analyst to obtain this approval and subsequent guidance applying to the additional qualifying expense.

With the interest of ensuring that HOPWA Supportive Services are as client-centered as possible, IHCDA recommends Project Sponsors to incorporate the following practices:

1. Clearly explain the resources available to each client/household
    a. Give the client options on what they can do and how to access resource when possible
    b. Make sure the pros and cons of each option are clearly understood so that clients can make an informative decision.
    c. Facilitate warm handoffs as much as possible when involving another provider.
2. Create and maintain policies and procedures that ensure that access to services – whether offered directly by Project Sponsor or referred to another agency/entity:
    a. Do not result in long delays between eligibility determination and housing/services offered to client, and
    b. Are adaptable to changing conditions and needs.

Since regulatory language regarding Supportive Services is broad in scope, there is a chance that other expenses not discussed above may be eligible under the "Supportive Services" line item. If there is a question regarding an expense that does not readily fit under the categories listed above, or your agency otherwise has a question on the eligibility of an expense, please contact IHCDA Community Services, communityservices@ihcda.in.gov or your Grants Analyst.

Facility Operations and Facility Based Assistance

Project Sponsors may use HOPWA funding to pay for operating costs for housing. Project Sponsors who own a facility may administer housing assistance such as facility-based housing, master-leased units and Project-Based Rental Assistance (PBRA). According to 24 CFR 574.300(b)(8) and HUD guidance, this line item may also be used to pay for the following expenses:

- Maintenance and repair of buildings
- Security
- Operation of building (i.e. front desk staff)
- Insurance
- Utilities
- Basic furnishings for the facility or a unit within facility
- Equipment – i.e. objects used long-term such as refrigerators, A/C systems, dishwasher, etc.
- Supplies – i.e. finite objects
- Other Incidental Costs

Please note that all furnishings purchased with this line-item must remain with the unit or HOPWA facility when the client moves out.

All facility operation costs must be reasonable and necessary. Additionally, Project Sponsors must maintain documentation for this line-item as follows:

1. Documentation on all expenses associated with facility operations costs is required to be on file at the site. See the HOPWA Claims Supporting Documentation Chart in Appendix I for information on specific forms of supporting documentation (both client and non-client related) that must be included in a claims submission.
2. Documentation must demonstrate that the facility operation costs are reasonable and necessary and that procurement procedures consistent with 2 CFR 200.317 through 200.327 are followed. The federal micro-purchase threshold for goods and services is $15,000. The Project Sponsor is responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures (2 CFR 200.320(a)(1)). The micro-

purchase threshold set by the Project Sponsor may not be more than $15,000. Micro-purchases may be awarded without soliciting competitive price or rate quotations if the recipient or subrecipient considers the price reasonable based on research, experience, purchase history, or other information; and maintains documents to support its conclusion.

3. Prior approval from IHCDA staff is not required prior to a purchase under $15,000 being made, unless questions about the eligibility of the expense arise or a specialized circumstance occurs.[28] The Project Sponsor must maintain documentation set forth in the table below for documentation requirements associated with micro-purchases made under this line-item.

Table 10: Documentation Requirements for Micro-Purchases for Facility Operations, by cost:

Documentation Requirements for Micro-Purchases of Goods (< $15,000)	Documentation Requirements for Micro-Purchases of Services (< $15,000)
The Project Sponsor's policy listing the Project Sponsor's micro-purchase threshold. The Project Sponsor's micro-purchase threshold must be $15,000 or less.	The Project Sponsor's policy listing the Project Sponsor's micro-purchase threshold. The Project Sponsor's micro-purchase threshold must be $15,000 or less.
Criteria determining how Project Sponsor chooses which option to purchase	Criteria determining how Project Sponsor chooses a particular vendor or contractor
The associated invoices and confirmation of payment received	The associated invoices and confirmation of payment received
The rationale for choosing the good and determination that the price is reasonable, including documents to support the price reasonableness.	The rationale for choosing the vendor and determination that the price is reasonable, including documents to support the price reasonableness.

4. Bids will be obtained for any services above $15,000. Below, we have outlined all documentation requirements associated with the cost of services performed in a Project Sponsor's facility.

[28] This line-item allows for both the purchase of goods and services. For the purposes of this line item, a "good" refers to purchases of finite objects, such as supplies, equipment, and basic furnishings; while a "service" is for work done by a third-party vendor or contractor.

Table 11: Documentation Requirements for Purchases Associated with Facility Operations, by cost:

Services Costing $15,000-$30,000 OR $30,000-$75,000 ***This is subject to requirements associated with the formalized bidding process.**	**Services Costing Above $75,000** ***Pursuing a competitive RFP process is REQUIRED in this case!**
Written documentation verifying that an adequate number of qualified contractors or vendors were examined *If total service costs more than the micro-purchase threshold adopted by the Project Sponsor but less than $30,000, a minimum of two (2) bids is required to be documented prior to the service being completed. *If service costs between $30,000-$75,000, a minimum of three (3) bids is required to be documented prior to the service being completed.	Written documentation verifying that an RFP took place. Documentation should clearly indicate when RFP took place, how it was publicized, services needed, and the terms and procedures governing the RFP process.
The monetary costs of each bid response	Generalized account of responses received; specifically number of responders, who responded, and how they ranked in Project Sponsor's evaluation of responses
Criteria determining how Project Sponsor chooses which option to purchase	The monetary costs of each responder's bid
The rationale for choosing the selected vendor	Criteria determining how Project Sponsor chooses the winning bid
The associated invoices and confirmation of payment received	The rationale for choosing one bid over the other(s)
	The associated invoices and confirmation of payment received

Permanent Housing Placement

Permanent Housing Placement (PHP) is an eligible HOPWA activity that assists HOPWA-eligible households in securing and moving into permanent housing by funding specific housing assistance (e.g. application fees, security deposits etc.) and service costs (e.g. assisting household to understand lease). The goal of PHP is to help establish permanent residency where continued occupancy in the unit is expected. PHP can especially be beneficial in relocating clients in emergency situations (i.e. natural disasters) or in need of VAWA housing protections.

Expenses eligible under PHP are intended to encourage positive housing stability outcomes for those living with HIV/AIDS. PHP can help address a wide array of housing challenges faced by people living with HIV/AIDS:

- Difficulty completing housing applications and/or navigating lease-up process
- Lack of resources for upfront move-in costs and fees
- Past rental arrears impacting credit/housing history and ability to obtain housing
- Past utility arrears impacting credit or preventing ability to establish utilities
- Housing barriers experienced by survivors of Intimate Partner Violence or Domestic Violence

PHP expenditures and activities must be tracked separately from the Supportive Services line item. PHP does not require a specific housing status or specific documentation of evidence of need. However, HOPWA staff should assess the client's ability (including monthly income/budget) to maintain occupancy in the unit.

Since HUD does not give a defined limit on the number of times a family can access PHP funds, IHCDA as the Grantee organization will also not impose a limit. Project Sponsors may have policies and procedures in place to limit PHP assistance for each family so long as the limit is consistent and does not violate any federal, state, or local laws and regulations.[29] I

n accordance with HUD guidance and resources, we have illustrated a table starting on the next page to specifically outline expenses that are eligible under the PHP line-item.

[29] The guidance provided in the "TBRA Term Limits" subsection of this manual also applies to any policy formed on PHP limits by the Project Sponsor.

Table 12: Eligible and Ineligible Permanent Housing Placement Costs

Type of Expense	Eligible PHP Cost	Ineligible PHP Cost
Application fees	**X**	
Administrative fees are charged in lieu of or in addition to a security deposit	**X**	
Assisting households to understand leases, secure utilities, and make moving arrangements	**X**	
Credit check expenses *(when required)*	**X**	
First/Last Month's Rent (*only for households not receiving other federal, state, or local housing assistance such as HOPWA TBRA or Housing Choice Voucher)*	**X**	
Housing referrals	**X**	
Mediation services related to neighbor/landlord issues *(at the time of placing the client into the unit only)*	**X**	
One-time utility connection fees	**X**	
Payment for representative payee services	**X**	
Rental Insurance *(limited to the first month OR initial payment period only)*	**X**	
Tenant Counseling	**X**	
Rent/Utility Arrears *(when a barrier to establishing new permanent housing)*	**X**	
Security Deposits *(not to exceed 2 months' rent or any state/local cap on assistance)*	**X**	
Staff salary, fringe, and other related overhead associated for PHP	**X**	
Utility deposit and one-time utility hookup fees	**X**	

Type of Expense	Eligible PHP Cost	Ineligible PHP Cost
Amenity Fees		X
First and/or last month's rent when a person has a rental subsidy		X
Housing supplies and goods		X
Moving costs such as movers, truck rental, storage fees, etc.		X
Ongoing assistance payments for rent, utilities, or insurance		X
Parking		X
Pet Fees		X
Renter's insurance after the initial payment		X
Repairs to the unit associated with the move-in		X
Security deposits greater than 2 months' rent		X
Smoke alarms		X
Staff salary, fringe, and other related overhead **NOT** for PHP		X
Standard furnishings		X

Shown in the visual below, there are four main methods to utilize PHP:

Visual 2: Methods to Utilizing PHP Assistance

PHP as a Stand-Alone Service

This option is especially well-suited in lower cost rental markets and/or for households who only need assistance with upfront costs and housing services. Through this option, Project Sponsors can assist households to move to private market rate units in their community.

PHP Combined with other HOPWA Assistance

Through utilizing this method, Project Sponsors may assist households moving into units that will receive ongoing HOPWA TBRA. Depending on the client's needs, Supportive Services may also be utilized in this case.

PHP Combined with non-HOPWA Assistance

Project Sponsors may assist HOPWA-eligible households moving into units that receive non-HOPWA TBRA, such as HCV or HOME.

Moving-On/Exiting HOPWA Assistance

Through this utilization method, Project Sponsors can use funding to assist households in moving out of HOPWA Facility-based housing or be a bridge for households that reached their STRMU limit and cannot afford to stay in their unit. Depending on the circumstance, the household may transition from receiving STRMU to TBRA.

If PHP is being utilized as a stand-alone service, the HOPWA rent standard and rent reasonableness requirements outlined in this manual do not apply. However, if PHP will be utilized alongside HOPWA TBRA or PBRA, Project Sponsors should follow the HOPWA rent standard outlined in this manual. If PHP will be utilized alongside another program, Project Sponsors must be mindful of the rent standard requirements associated with the applicable program in question.

The utilization method chosen by Project Sponsors should be based on a combination of factors, such as the client's circumstances and Project Sponsor's programmatic policies. Questions on administering PHP can be sent to your Grants Analyst.

Housing Information Services

Through this line item, Project Sponsors may also provide information and referral services to assist families to locate, acquire and maintain affordable housing, including HOPWA and non-HOPWA-funded housing resources. This may also include fair housing counseling to protect HOPWA clients from discrimination, if Project Sponsors offering this meets the requirements listed in 24 CFR 574.300(b)(1).

Eligible housing information costs include:

Housing Search and Placement

- Staff costs and overhead associated with housing search and placement such as searching for units, filling out rental applications, and navigating waitlists.

Landlord Outreach

- Working directly with landlords to secure units, explain housing programs, and advocate for clients who might have barriers like poor credit histories or past evictions.

Information Referral

- Connecting individuals to other community resources, such as emergency shelters, transitional housing, housing authorities, utility assistance, or legal aid.

Fair Housing Counseling

- Providing guidance and/or advocacy for clients experiencing housing discrimination based on HIV status, race, color, religion, sex, age, national origin, familial status, handicap or other protected class.

Resource Identification

Resource Identification is a HOPWA activity that focuses on developing and enhancing the community housing resources for persons living with HIV/AIDS. It is a systems-level activity that allows Grantees and Project Sponsors to build and improve their community response to expand access to housing and HIV treatment.

Resource Identification may be used on systems-wide initiatives that advance the housing needs of those living with HIV and their loved ones. For reference, see the examples listed in Figure 3 shown on the next page. Please note that the examples offered are non-exhaustive:

Figure 3: Non-Exhaustive, Eligible Examples to Utilize Resource Identification Funding

Community Needs Assessments	• Conducting surveys, data research, and client focus groups to find out where the gaps in HIV/AIDS housing are in a specific city or region. • Conducting focus groups for collecting qualitative data • Hiring consultants/contractors to perform HIV housing needs assessments
Developing Housing Inventories	• Creating and maintaing comprehensive databases of affordable, HIV-friendly housing options that local non-profits can use
Systems Analysis and Coordination	• Staff time associated with attending housing-related meetings such as Regional Planning Council Meetings on your agency's behalf • Identifying and tracking housing resources for current/future clients • Strengthening relationships with local landlords, public housing authorities, and other local and state affordable housing partnerships
Feasibility Studies	• Funding the preliminary research needed to see if a new housing initiative or community residence project is actually practical to build

Funding dedicated to resource identification cannot be used to directly serve clients. If the Project Sponsor seeks to place a client into a unit or locate assistance, Permanent Housing Placement or Housing Information Services are more appropriate. Additionally, Resource Identification may only be used on IHCDA HOPWA awards dating from FY2025 and later.

Like the Supportive Services activity, Resource Identification is also a broad and flexible activity. Questions about how to use Resource Identification should be directed to your Grants Analyst.

Administration

No more than seven (7%) percent of a Project Sponsor's HOPWA funding in any given fiscal year may be used for administrative purposes. Allowable expenditures include:

1. Office supplies and postage
2. Rent and utilities of office space
3. Staff time and fringe associated with HOPWA tasks that are not directly associated with other eligible line-items, such as reviewing invoicing, completing claim submissions, responding to monitoring requests, and completing HOPWA grant reporting requirements
4. Costs of software or computer program used for HOPWA-eligible activities
5. Costs associated with attending HOPWA-related trainings[30]

[30] To use HOPWA administration funding to pay for a training, approval must be granted from either a HUD CPD Representative or from the Office of HIV/AIDS Housing. There may be cases in which approval to use HOPWA funding for a training may be granted via Notice, such as the 2024 HOPWA Institute Funds Memo.

HOPWA Rent Standard: FMR and Rent Reasonableness Requirements

Rental assistance provided through TBRA or Facility Based Assistance (via permanent and/or transitional Project Based Rental Assistance), is subject to Fair Market Rent (FMR) and Rent Reasonableness requirements. Specifically, units may not exceed FMR estimates for the geography you are working in, unless you have received explicit approval from IHCDA (which is granted in very limited circumstances) or are implementing the exception outlined in the "Limited Exception to FMR" section of this manual. In all cases, units may not exceed local rent reasonableness estimates.

FMR refers to estimates of 40th percentile gross rents for standard quality units within a designated area. FMRs are calculated annually by HUD's Office of Policy Development and Research. For the HOPWA program, Project Sponsors must use County or Metropolitan Statistical Area (MSA) FMRs. The use of Small Area Fair Market Rent (SAFMR) – which specifies FMR amounts based on zip codes – in the HOPWA program is prohibited in all cases outlined in the previous paragraph. To calculate the FMR for your state and metropolitan area, please visit the HUD User Web site at https://www.huduser.gov/portal/datasets/fmr.html and click on the link for the corresponding fiscal year you are operating.[31] If you identify your county or metropolitan area and still find that you are seeing SAFMR estimates, please look for the line on the webpage saying "For FMR information for other programs, please click here" and follow those instructions to see the applicable FMR. If you need additional assistance, please contact your Grants Analyst.

Rent Reasonableness refers to the act of ensuring that a unit that is supported by grant funds is not more expensive than a similar unit that is not supported by grant funds. IHCDA requires rent reasonableness checks to be completed via AffordableHousing.com. To ensure that staff at your agency have access to this site, please email IHCDA Community Services, communityservices@ihcda.in.gov or your Grants Analyst directly for access to the platform. Creating your own account manually may result in technological errors, including but not limited to failing to successfully gain the proper permissions to use the AffordableHousing.com platform.

Both FMR and Rent Reasonableness checks must be documented for tenant- and project-based rental assistance and included in the assisted client's file. Per page 24 of HUD's HOPWA Rental Assistance Guidebook, STRMU assistance is not limited to FMR or rent reasonableness requirements.

FMR and Rent Reasonableness in Shared Housing Arrangements

The rent charged for an assisted family or individual in shared housing arrangements shall be in relation to the size of the private space for that assisted family or individual in comparison to

[31] CPD-22-10, Clarification of Rent Standard Requirement for the Housing Opportunities for Persons with AIDS (HOPWA) Program, Notice CPD-22-10: Clarification of Rent Standard Requirement for the HOPWA Program - HUD Exchange

other private space in the shared unit, excluding common space. The HOPWA rent standard for a family in shared housing is the lower of:

- The program's rent standard for the family unit size; or
- The pro-rata share of the program's rent standard for the shared housing unit size.

The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space divided by the total number of bedrooms in the unit. To determine whether the rent costs for your shared housing arrangement was calculated correctly, please view the Shared Housing Rent Calculation Sheet on IHCDA's HOPWA page.

Limited Exception to FMR

There are limited exceptions to the FMR policy described above. According to 24 CFR 574.320(a)(2), Project Sponsors - on a unit by unit basis – may surpass FMR estimates by up to 10 percent for up to 20 percent of the units assisted.

Obtaining prior approval from IHCDA to utilize this exception is not required. For Project Sponsors choosing to utilize this exception, IHCDA will review any awards who utilize this exception for compliance with the regulation cited above. To ensure that Project Sponsors comply with this process, please complete the following:

1. Indicate the use of the exception through the completion of the Rent and Income Calculation Form for each client household.
2. Track the overall use of the limited exception through the Limited Exception to FMR Tracker, available on IHCDA's HOPWA webpage. This overall tracker does not need to be in a claim submission or on HMIS. However, if you utilize the limited exception detailed above, you will need to complete and provide this for the CS Compliance Team to review.
3. If Project Sponsors opt to utilize this exception, then they should create and implement a policy highlighting how the agency will abide by these requirements and how to select which instances warrant the use of this exception.

Please note that all HOPWA-assisted units must continue to meet rent reasonableness requirements. Failure to comply with the requirements for this exception may result in having to pay funding back to IHCDA.

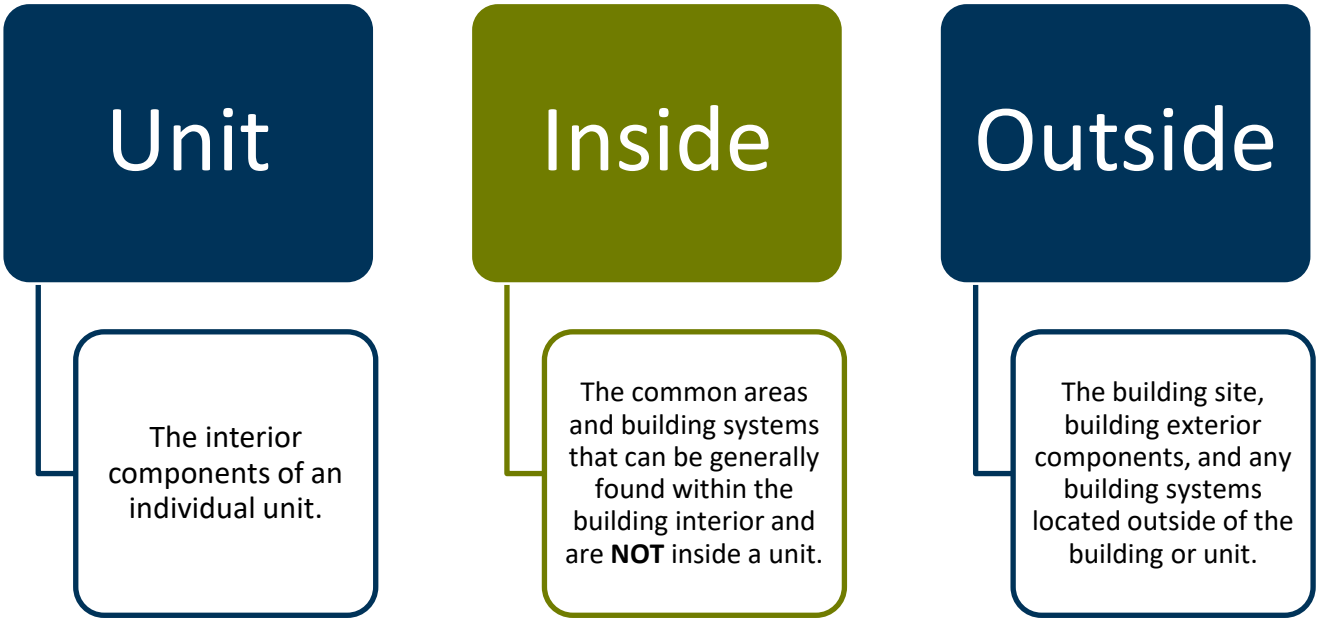
National Standards for the Physical Inspection of Real Estate (NSPIRE)

Beginning February 2, 2026, IHCDA's HOPWA program started utilizing the National Standards for the Physical Inspection of Real Estate (NSPIRE) for clients placed in new units, in accordance with FR-6469-N-01 and the supplemental material published here. Previously, Project Sponsors were required to exclusively use the Habitability Quality Standards (HQS) inspection framework when inspecting units.

NSPIRE Framework

As an inspection framework, NSPIRE is a new approach to "strengthen HUD's physical condition standards and improve HUD oversight." (FR-6469-N-01) It is meant to consolidate various housing standards into a common framework that can be adapted to multiple HUD-funded programs.

The NSPIRE Rule requires HOPWA-assisted units to be inspected according to the Unit (24 CFR 5.703(d)), Inside area (24 CFR 5.703(b)), and Outside area (24 CFR 5.703(c)). The illustration below summarizes the three types of NSPIRE inspectable areas:



Each possible deficiency outlined in the HOPWA NSPIRE Standards also includes a corresponding "Health and Safety Category," which grades the severity of each deficiency. These categories impact the requirements and timelines associated with addressing each deficiency. We have outlined HUD's definition of each Health and Safety Category on the next page:

Figure 4: Outline of Each NSPIRE Health and Safety Category

Low

- Refers to deficiencies that are critical to habitability but not presenting a substantive health or safety risk to the resident.

Moderate

- Refers to deficiencies that, if evident in the home or on the property, present a moderate risk of an adverse medical event requiring a healthcare visit; cause temporary harm; or if left untreated, cause or worsen a chronic condition that may have long lasting adverse health effects; or that the physical security or safety of a resident or their property could be compromised.

Severe

- Refers to deficiencies that, if evident in the home or on the property, present a high risk of permanent disability, or serious injury or illness, to a resident; or the physical security or safety of a resident or their property would be seriously compromised.

Life Threatening

- Refers to deficiencies that, if evident in the home or on the property, present a high risk of death to a resident.

NSPIRE Applicability

The NSPIRE requirements apply for all new units assisted through Tenant Based Rental Assistance (TBRA), Project Based Rental Assistance (PBRA), and Operating Costs. NSPIRE requirements do not apply to any units assisted through Short-Term Rent, Mortgage, and Utilities (STRMU) and Permanent Housing Placement (PHP).

For clients living in a HOPWA-assisted unit before February 2, 2026, annual inspections and renewals must be completed with the HQS framework. If the client moves to a new HOPWA-assisted unit, the new unit is subject to the NSPIRE requirements.

Units associated with STRMU and PHP are only required to ensure that smoke and carbon monoxide detectors/alarms are present and functioning. Additionally, activities such as Supportive Services, Housing Information Services, Resource Identification, and Administration are exempt from NSPIRE activities.

Using NSPIRE

To demonstrate compliance with NSPIRE requirements, Project Sponsors must complete the HOPWA NSPIRE Inspection Checklist for each unit requiring an inspection. This checklist includes a list of each inspection area, the possible deficiency, and the Health and Safety Category that the deficiency falls under.

The NSPIRE HOPWA Notice describes affirmative requirements as the basic requirements that must be met for HOPWA housing assistance to be provided. Housing that does not meet affirmative requirements is therefore not eligible to receive HOPWA assistance. Additionally, housing that does not address all deficiencies identified within the timeline outlined in Table 1 will also not be eligible for HOPWA assistance.

Table 1: Timelines to Correct Deficiencies by Health and Safety Category

Health and Safety Category – Level of Deficiency	Timeline to Fix Deficiency	Extensions to Timeline Allowed
Low	60 Days	Yes, on a case-by-case basis. See "Fixing Deficiencies" sub-section of this manual.
Moderate	30 Days	Yes, on a case-by-case basis. See "Fixing Deficiencies" sub-section of this manual.
Severe	30 Days	No.
Life-Threatening	24 Hours (1 Day)	No.

Fixing Deficiencies

The terms in the signed lease and Rental Assistance Payment contracts will dictate who is financially responsible for fixing the deficiency identified.

For "Low" and "Moderate" deficiencies, IHCDA will only allow time extensions in the following cases:

1. If an extension to one or more "low" or "moderate" deficiencies does not violate any local housing codes; AND
2. Identifying another unit for the client household is not possible; AND
3. The landlord or building manager is fully committed to addressing the deficiencies.

To request an extension, Project Sponsors should email their Grants Analyst the following information:

1. The location (county or metropolitan area) in which the unit is located. Due to confidentiality requirements associated with the HOPWA program, please do not send the unit's address or any other personal identifiable information via email.
2. An outline of the deficiencies identified
3. An explanation of the situation that has occurred and why an extension is needed
4. The requested amount of additional time needed to address the deficiency (in days)
5. Process that Project Sponsor will take to ensure that deficiencies are addressed by the extended deadline

If the extension is granted, Project Sponsors must follow up with their Grants Analyst to confirm the final status of the unit by no later than 1 business day after the new deadline.

After the deficiencies are addressed, a re-inspection should take place to confirm that the unit passes its NSPIRE inspection.

Project Sponsors must document all communications regarding NSPIRE inspections and the dates of each initial and additional NSPIRE inspection for each prospective unit.

Addressing Failed Inspections

If the unit fails inspection, Project Sponsors must address issues according to the signed lease and Rental Assistance Payment contracts. If the deficiencies identified were fixed within the timeframe offered earlier in this guidance, then assistance could resume and any deferred payments could be paid back to the landlord in question.

If the timeline in Table 1 was not met and there is not an approved extension on file, then Project Sponsors should stop administering HOPWA assistance for that unit, with no potential for retroactive payment. Project Sponsors should then follow steps outlined in their RAP to terminate the agreement with the landlord.

Leveraging vs. Duplication of Benefits

Leveraging HOPWA funding refers to the idea of using multiple funding streams to pay for services and expenses. Leveraging as a practice opens more resources that foster positive housing and health outcomes.

Project Sponsors are encouraged to leverage their HOPWA funding with other sources of funding. As indicated by previous CAPER submissions, additional sources of funding to leverage with HOPWA may include but are not limited to: Ryan White Part B, CoC, ESG, and HOME.

A client household could benefit from both HOPWA and another federal funding source so long as the client household meets the eligibility criteria of each funding source and that the funding streams do not pay for the same cost incurred. When leveraging funding, examine all eligible expenses of each funding source, the expenses incurred for the client/household members, and bill according to what each program can pay for.

Duplication of Benefits

Duplication of benefits – or "double dipping" – occurs when a client is essentially receiving the same benefit and costs paid by more than one federal funding source. For example, if a client gets rental assistance from HOPWA TBRA and another source (i.e. HCV) for the same expense charge, then that could indicate a duplication of benefits if they both pay for the same cost incurred.

The diagrams below illustrate a few examples of what could be considered double-dipping. Please note that these examples are non-exhaustive:

Figure 5*: *Duplication of Benefits Example 1 – General

The example provided is considered "double-dipping" because the relevant programs are paying the same cost twice.

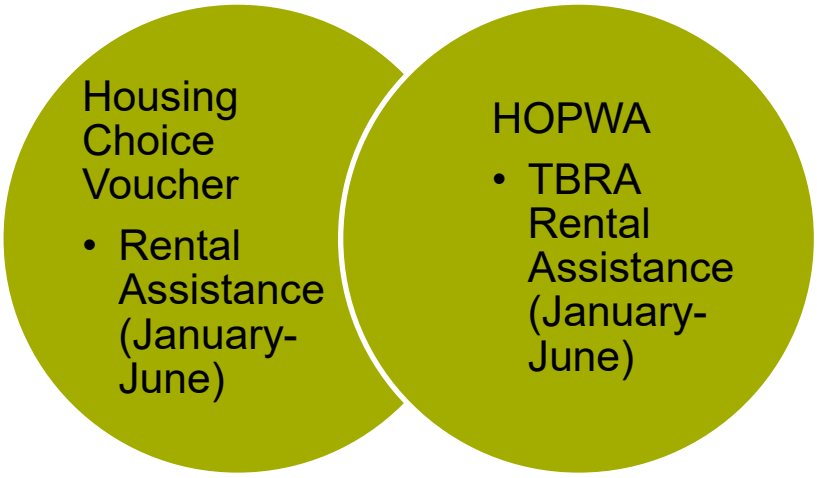
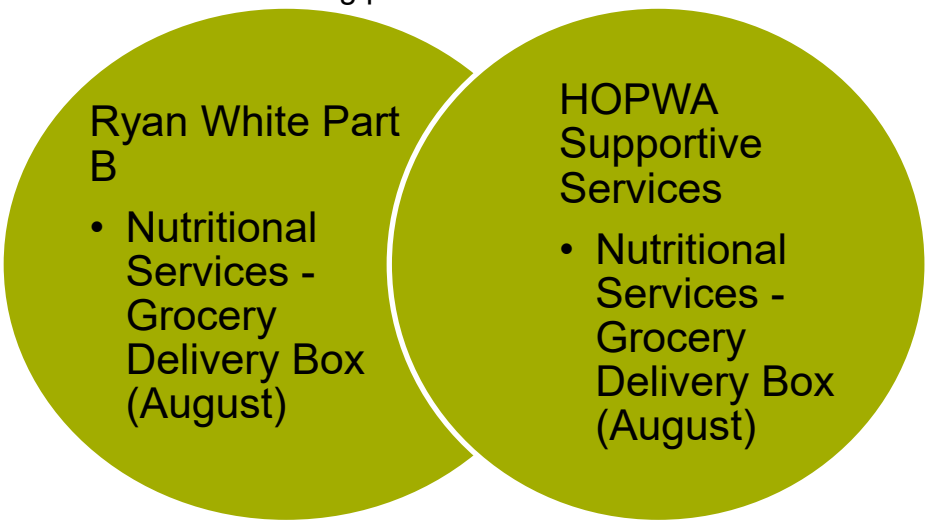


Figure 6: Duplication of Benefits Example 2 – Ambiguity and a Fine Line

In this example, Ryan White Part B and HOPWA are both paying for grocery delivery boxes bought in the month of August. On the surface, a client household receiving both could result in the cost of nutritional services being paid twice.



However, in practice, there is some amount of ambiguity that the diagram above doesn't readily illustrate. If the Project Sponsor in this scenario only gives only one grocery box to the client household but uses multiple federal funding sources to pay for it, the Project Sponsor will have to review their method of allocating costs.

The Project Sponsor will have to answer the following questions:

1. Are there only specific grocery items paid for by one funding source vs. another?
2. Will the Project Sponsor bill according to proportion of cost, such as 50% per program in this scenario?
3. How will the Project Sponsor document the way in which this expense was paid for?

Leveraging Without Duplicating

The list below illustrates sample options that Project Sponsors may take to leverage HOPWA without the risk of duplicating benefits:

1. Have HOPWA pay for rental assistance (TBRA, STRMU, Facility Based or Project Based Rental Assistance) and Ryan White funding pay for other qualifying expenses.
2. Have HOPWA pay for any non-rental assistance (i.e. Supportive Services, Housing Information Services) and non-HOPWA funding pay for rental assistance.
3. Have HOPWA pay for Permanent Housing Placement (i.e. Security Deposits) and non-HOPWA funding pay for rental assistance.

Project Sponsors could also prevent duplication by having each client household only benefit from one (1) HUD program. However, in practice, this would be the strictest application and could result in resource or service gaps if funding otherwise falls short. Project Sponsors should

review their funding sources and procedures to ensure they're maximizing the effectiveness of their funding.

The best practice to ensure an agency does not inadvertently double dip on costs incurred is to keep your HMIS data entries and client documentation up-to-date. This could mean documenting all interactions with clients in case notes or using mechanisms that track which funding source pays for each expense.

The following diagrams below show examples of how you can leverage your funding sources without being at risk of double-dipping. Please note that these examples are non-exhaustive and that client households must meet all the eligibility criteria of each program they benefit from before you can successfully leverage funding:

Figure 7: Rental Assistance vs. Utilities throughout term of assistance

As seen in the figure below, the Housing Choice Voucher and HOPWA programs pay different expenses altogether. As a reminder, the calculated client contribution needs to continue being paid by client themselves, if income calculation shows that they need to contribute.

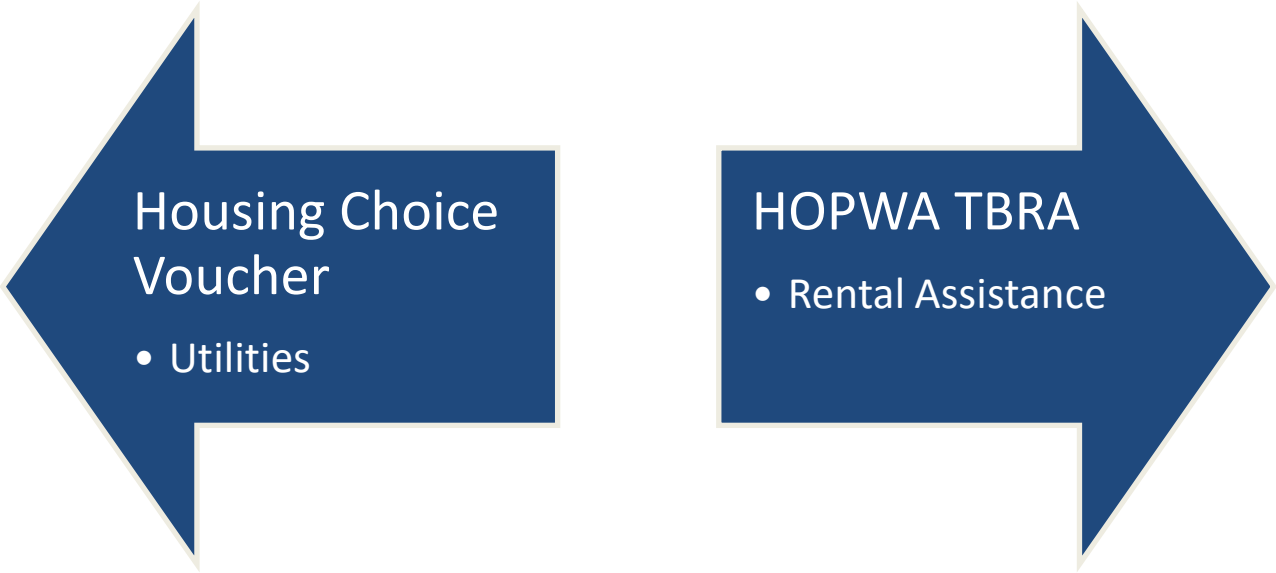


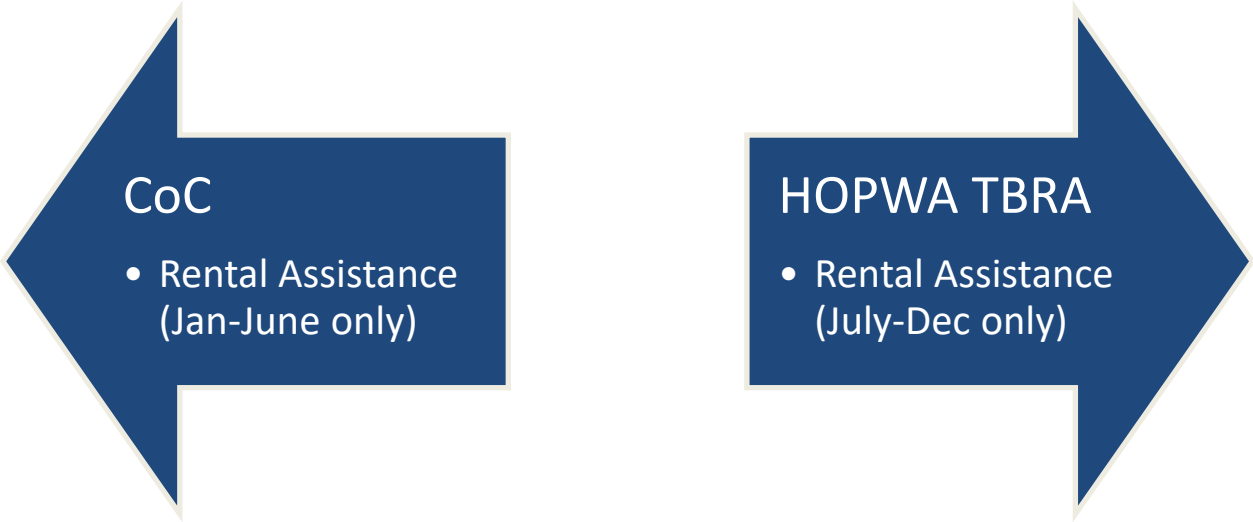
Figure 8: Rental Assistance vs. Nutritional Services throughout term of assistance

It is apparent that the client household is receiving benefits from multiple federal programs. Since the costs are not the same, "double-dipping" does not apply in this scenario.

Please note that ESG is more stringent on what can and cannot be leveraged with other programs. Additionally, Project Sponsors that leverage ESG and HOPWA must ensure that the client was eligible for both programs at the time of initial intake. For specialized questions about leveraging ESG and HOPWA, please contact IHCDA Community Services, communityservices@ihcda.in.gov.

Figure* 9: *Rental Assistance vs. Rental Assistance throughout term of assistance

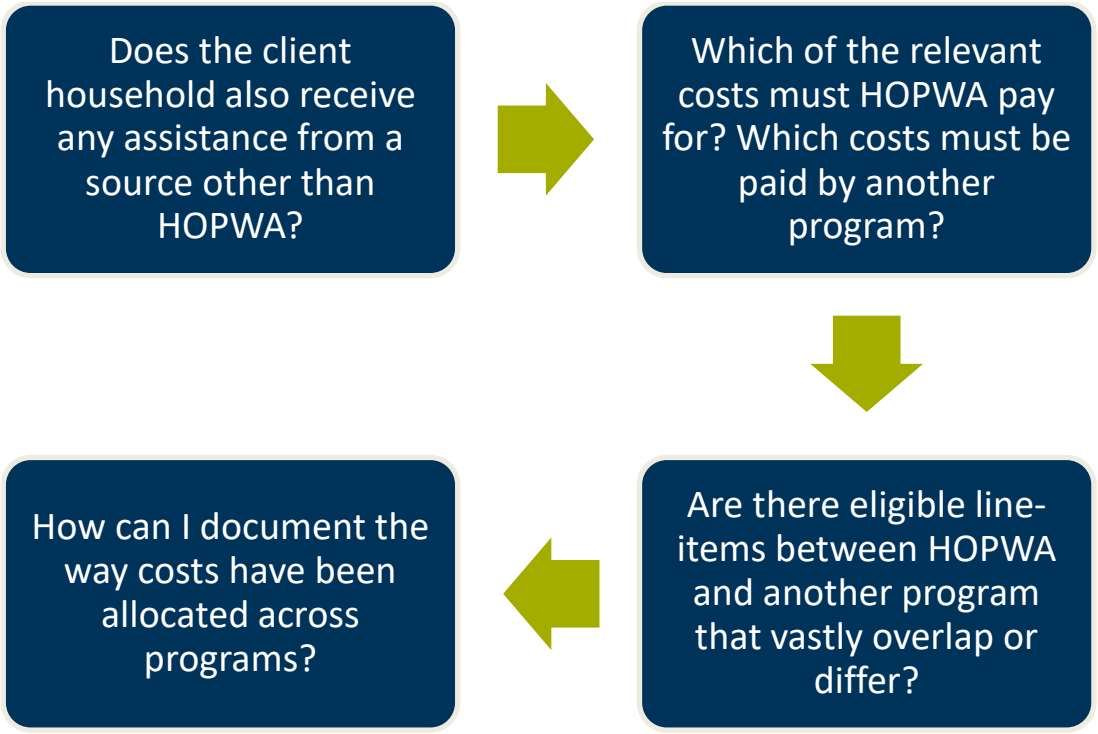
As evidenced in the figure below, both the CoC and HOPWA programs are paying for a client household's rental assistance. However, since CoC is paying for 6 months of a client household's lease and HOPWA TBRA pays for the remaining 6 months, there should not be any double-dipping. Like prior examples, this assumes that the client household in question qualifies for both programs.



Questions to Ask: Leveraging vs. Duplication

The figure below shows some questions a Project Sponsor should ask in determining how to leverage their funding without duplicating costs.

Figure 10: Questions a Project Sponsor should ask when leveraging their funding



As always, there are always specialized circumstances that impact the client and their household. If there are questions about leveraging vs. double-dipping and how to adequately document this effort, please contact your HOPWA Grants Analyst.

Termination of Assistance

HOPWA regulations and guidance allow for termination of assistance as a last resort. As such, IHCDA expects Project Sponsors to explore all options before terminating a client from the HOPWA program. Please be sure that termination of assistance is initiated only in the most severe situations and that when termination is necessary, the program offers the household assistance in finding alternative housing whenever possible. The impact on households who may become homeless or unstably housed because of termination from assistance should be considered when implementing or reconsidering program policies.

The following list below shows how a termination of service could occur:

1. **Voluntary Termination:** When the Client chooses to leave the program for any reason, including but not limited to: the Client no longer requires assistance or the Client has enrolled in the Housing Choice Voucher Program or another program that provides housing assistance. The client may also be terminated from the program if they no longer meet eligibility criteria due to increases in household income surpassing 80% AMI.

2. **Death of Client:** With respect to the surviving member or members of a family who were living in a unit assisted under the HOPWA program with the person with AIDS at the time of their death, housing assistance and supportive services under the HOPWA program may continue for a grace period not to exceed one year from the death of the family member with AIDS. The Project Sponsor shall notify the family of the duration of their grace period and may assist the family with information on other available housing programs and with moving expenses.

3. **Involuntary Termination:** A termination initiated by the Project Sponsor due to the Client's non-compliance with program requirements or fraud.

Examples of non-compliance/fraud include but are not limited to:

1. Client does not follow the requirements of the rental assistance payment contract, or other agreements/guidance related to the HOPWA program
2. Client is no longer occupying the unit
3. Client fails to provide a lease or requested information for application processing
4. Client fails to report all sources of household income
5. Client fails to identify all household members
6. Client or family members falsify information to receive assistance

The Project Sponsor's termination policy and procedures should be outlined in your Program Service Agreement with the client. The termination policy should describe the circumstances a termination may be pursued, what the termination process may look like, and how the client can appeal the decision.

Note Regarding Involuntary Termination

Project Sponsors who involuntarily terminate a client must follow a formal termination process that recognizes the client's right to due process of law.

This process must include:

1. Serving the Client with a timely written notice containing a clear statement of the reasons for termination and that contains clear timelines.
2. Permitting the Client to have a review of the decision, in which the Client is given the opportunity to confront opposing witnesses, present written objections, and be represented by their own counsel, before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Providing prompt written notification of the final decision to the Client.

Appeals

The following process applies for a client wanting to appeal their termination of HOPWA assistance:

1. **Informal Review (via Project Sponsor)**
    a. If a client disagrees with the reason for involuntary termination, they may submit a written request to the Executive Director (or equivalent) of the Project Sponsor agency for a review of the determination. The request must be submitted within ten (10) business days of Client's receipt of the determination and include specific reasons why the client feels the termination decision was inaccurate or unfair. The Client may submit additional documentation for review by the Executive Director at the time of the review request.
    b. The Executive Director will then have fifteen (15) working days to review the termination decision and render their findings. The Executive Director may extend this time at their discretion but will need to give a response by no later than forty (40) days after receipt of the Client's appeal.

2. **Formal Appeal to IHCDA**
    a. If the Client disagrees with the findings of the Executive Director, they may request IHCDA's Formal Review of the Executive Director's decision. The request must be made in writing and addressed and delivered to IHCDA's Compliance Attorney within ten (10) business days of Client's receipt of the Executive Director determination and sent to:

        Indiana Housing and Community Development Authority
        Attn: IHCDA Legal
        30 S. Meridian Street, Suite 900
        Indianapolis, IN 46204

b. The request for an appeal must include all documents the Client would like IHCDA to consider and the stated reasons for the Client's objection to the Executive Director's decision, which reasons must be based solely upon evidence supporting one (1) of the following circumstances:
    i. Clear and substantial error or misstated facts which were relied on in making the decision being challenged;
    ii. An illegal, unethical or improper act;
    iii. Other legal basis that may substantially alter the decision; or
    iv. Is contrary to regulations or requirements, or otherwise contrary to Federal, State or local law.

IHCDA will examine the evidence that was originally submitted to the Executive Director. It shall be within the sole discretion of IHCDA to grant or deny the request for review.

The parties will receive written acknowledgement of receipt of the appeal within fourteen (14) business days of its receipt, noting the day the appeal was received. IHCDA's Legal Department will review documents provided by both the Client and the Project Sponsor before making a determination. The review may result in the Executive Director's decision being upheld, reversed or returned to the Project Sponsor with instructions for further action. After completing its review, IHCDA will notify all parties in writing.

Additional Requirements

Checking for Landlord Debarment on SAM.gov

All payments remitted to landlords (TBRA, STRMU, PHP, etc.) constitute a "covered transaction" as described in 2 CFR 180.210. This renders Project Sponsors responsible for determining whether it is entering into a covered transaction with an excluded or disqualified person. The regulation at 2 CFR 200.214 states that recipients and subrecipients must not make any award or permit any award at any tier to any party that is debarred or suspended or is otherwise excluded from or is ineligible for participation in federal assistance programs subject to 2 CFR Part 2424. To comply with this requirement, Project Sponsors must utilize sam.gov to check participating landlords for exclusions or suspensions. Inquiries about this requirement may be directed to your Grants Analyst.

Instructions on how to check for landlord debarment are included below. A step-by-step guide with screenshots from SAM.gov is also available on IHCDA's HOPWA webpage.

10.1 How to Check for Landlord Debarment on SAM.gov

You can check if a landlord (or any entity/individual) is excluded or debarred from federal contracting and grant activities using the **SAM.gov Exclusions Search** tool. This is the official U.S. government system for tracking such status. The step-by-step process is outlined below:

1. **Go to SAM.gov**
   Visit the official site: https://sam.gov SAM.gov.

2. **Log in or create an account**
   If you are a federal contractor or have a SAM account, log in. If not, you can still use the public search without logging in SAM.gov.

3. **Access the Exclusions Search**
   On the homepage, click the **"Search"** tab on the left side of the page, under the Sam.Gov logo.

   a. On the "Search" page, click the **"Entity Information"** button among the options in the middle of the page.
   b. Use the "scroll arrow" to scroll to the end of the options.
   c. Click the **"Exclusions"** button. Now you are ready to search for exclusions.

4. **Enter search criteria**
   Type in your search terms into the box next to "All Words". You can search by:
   a. **Entity or individual name** (partial or full)
   b. **UEI Number** (formerly D-U-N-S)

5. **Run the search**
   Click the "Magnifying Glass" button to run the Search. If no results are shown, that means the Landlord has not been excluded from receiving federal funds and you can

continue housing the client in the unit. **Save** a *Screenshot* or *Printout* of the search for your records.

a. If your search terms return any results, you will see:
    - Entity/individual name
    - UEI
    - Exclusion type and status
    - Dates of action
    - Reason for exclusion (if available)

Review details to confirm the Exclusion Record matches the Landlord you are searching. If the Landlord shows as **Excluded,** they are not eligible to receive federal funds—your client(s) cannot be housed in their unit with any federal funds.

Helpful Tips:

a. **UEI is the most reliable identifier** — if you have it, use it for the most accurate results.
b. **Check regularly** — SAM records are updated frequently.
c. **Understand the implications** — being excluded means the entity cannot bid on or perform federal contracts or grants.

Requirements for Smoke Detectors in Assisted Units

HOPWA-assisted units shall contain qualifying smoke alarms that are installed in accordance with applicable codes and standards published by the International Code Council or the National Fire Protection Association and the requirements of the National Fire Protection Association Standard 72, or any successor standard, in each level and in or near each sleeping area in the unit, including in basements but excepting crawl spaces and unfinished attics, and in each common area in a project containing HOPWA-assisted units.[32] The term "qualifying smoke alarm" means a smoke alarm that:

(i) in the case of a HOPWA-assisted unit built before December 29, 2022, and not substantially rehabilitated after December 29, 2022—

(I)(aa) is hardwired; or

(bb) uses 10-year non rechargeable, nonreplaceable primary batteries and—

(AA) is sealed;

(BB) is tamper resistant; and

(CC) contains silencing means; and

(II) provides notification for persons with hearing loss as required by the National Fire Protection Association Standard 72, or any successor standard; or

(ii) in the case of a HOPWA-assisted unit built or substantially rehabilitated after December 29, 2022, is hardwired.

The Fire Administrative Authorization Act of 1992 limits the payment of rental assistance in connection with newly constructed multifamily units (post-1994) that are four or more stories unless the property is equipped with automatic sprinkler systems and hard-wired smoke detectors.

Policies and procedures should ensure that during the HOPWA Habitability Standards inspection, program staff adequately review housing units to ensure they conform to the requirements set forth in this section.

Affirmative Outreach to all Qualifying Persons

Project Sponsors must adopt procedures to ensure that all persons who qualify for the assistance, regardless of their race, color, religion, sex, gender, age, national origin, familial status, or handicap, know of the availability of the HOPWA program. This includes knowledge and ability to utilize facilities and services accessible to persons with a handicap and maintaining documentation to demonstrate implementation of these procedures.

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[32] 42 U.S.C. 12905(j)

Policies Surrounding Nondiscrimination

Project Sponsors must comply with the nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) and other applicable laws and regulations, including but not limited to the following:

- **Title VI of the Civil Rights Act of 1968**, as amended, and its implementing regulations in 24 CFR 1. Prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

- **Title VIII of the Civil Rights Act of 1968 (Fair Housing Act, 42 U.S.C. 3601-3619) as amended**, and its implementing regulations in 24 CFR 100. Prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, and familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18).

- **Title II of the Americans with Disabilities Act of 1990**. Prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals. The implementing regulations at 28 CFR part 35 (States and local government grantees) and part 36 (public accommodations and requirements for certain types of short-term housing assistance) set forth additional requirements.

- **Architectural Barriers Act of 1968**. Requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by persons with disabilities.

- **Section 504 of the Rehabilitation Act of 1973**. Prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Meaningful Access of Limited English Proficient Persons

Persons who do not speak English as their primary language and have limited ability to speak, read, write, or understand English ("limited English proficient persons" or "LEP") may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter. In accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, the Project Sponsor must take reasonable steps to ensure that HOPWA-eligible, LEP clients have meaningful access to assistance.

Depending on the circumstances, the following actions that constitute "reasonable steps" could include:

- Acquiring translators to translate vital documents, advertisements, or notices;
- Acquiring interpreters for face-to-face interviews with LEP persons;
- Placing advertisements and notices in newspapers that serve LEP persons;

- Partnering with other organizations that serve LEP populations to provide interpretation, translation, or dissemination of information regarding the project;
- Hiring bilingual employees or volunteers for outreach and intake activities; and
- Contracting with a telephone line interpreter service.

HOPWA Program FAQs

Programmatic FAQs

- ***Can/Do HIV+ individuals who are minors qualify for HOPWA assistance?***
    - Yes, the HIV+ client in a household may be a minor (under age 18). There is no age requirement on the age of the HIV+ client that qualifies a household for HOPWA assistance. The HIV+ individual also does not have to be the head or co-head of a household.

Grants Administration FAQs

- ***How long does it take for a HOPWA claim to be reimbursed?***
    - The timeline, on average, may range anywhere from 10 to 30 business days after the initial claims submission has been approved by IHCDA's Claims Team. The range can vary depending on the time it takes for a Project Sponsor to have their initial submission approved by the Claims Team, lag time between state and federal holidays, the timing for IHCDA's Accounting staff to successfully draw the funds, and the timing for the drawn funds to successfully be delivered to the Project Sponsor's bank account.
    - With this said, we understand that timely reimbursement is a priority for all Project Sponsors. Concerns about the timing of reimbursement should be directed to your Grants Analyst so that they can follow up with staff as appropriate.

- ***After further review, it looks like I won't be able to fully expend my grant by the deadline outlined in my agreement. What do I need to do? Does this impact my ability to receive future funding?***
    - If you're unable to fully expend an award, we strongly recommend contacting your Grants Analyst as soon as possible. Your Grants Analyst may be able to help you brainstorm ideas for full utilization or assist in de-obligating funding in your award.
    - While IHCDA does look at grant utilization rates, we also want to ensure that all funding obligated to our jurisdiction can be spent on the Hoosiers who need it. IHCDA would rather de-obligate funding that could then go to another partner with capacity to spend than to have unspent dollars. Our team views any communication that helps our jurisdiction fully expends its funding positively. So long as the Project Sponsor continues to meet funding eligibility requirements, impact on funding amounts should be relatively minimal.
    - With that said, we will also monitor how often we need to de-obligate funding. If this is a recurring problem, IHCDA may ask the Project Sponsor questions about context and what capacity looks like before reviewing whether adjustments to future funding amounts are needed.

- ***Does HOPWA require match?***
    - Unlike CoC and ESG, HOPWA does not formally require match. However, the HOPWA grant is a reimbursement-based grant, so Project Sponsors should have adequate cash flow to cover HOPWA-eligible expenses until they can be reimbursed for said expenses at a later date.

- ***The links to the forms listed on the IHCDA HOPWA page are not working. How can I get access to the form I need?***
    - Please email IHCDA Community Services, communityservices@ihcda.in.gov, or your Grants Analyst directly for assistance.

Eligible Expenses - General

- ***Could payments for eligible expenses be made directly to clients?***
    - No, direct payments to clients are not eligible. Eligible expenses that are directly associated with clients should be paid directly by the Project Sponsor to the vendor, contractor, landlord, or other entity. Questions about this provision or concerns about specialized circumstances in which this may be appropriate should be sent to your Grants Analyst.

- ***When we claim staff mileage, what rate(s) should we use?***
    - This depends on the Project Sponsor's staff mileage reimbursement rate. There are a few considerations Project Sponsors should employ in determining the mileage reimbursement rate they utilize:
        - Project Sponsors may not surpass the IRS' mileage reimbursement rate published here.
        - Both IHCDA and State of Indiana do not follow IRS rates of mileage reimbursement. The mileage reimbursement rates utilized by IHCDA and State of Indiana are published here. Project Sponsors can go over the State of Indiana's mileage reimbursement rate so long as it does not exceed the IRS' mileage reimbursement rate.

- ***Are there any spending caps on any of the HOPWA-eligible line items?***
    - The only line-item that has a spending cap is administration. As mandated by 24 CFR 574.300(b)(10)(ii), Project Sponsors may not spend more than seven (7.00%) percent of their funding on administrative expenses. Failure to manage this utilization will result in having to repay funding back to IHCDA.

- ***May I claim staff time (and subsequent fringe and benefits) on TBRA?***
    - Staff time associated with TBRA activities is eligible under "Long-Term Program Delivery."

- If you need to amend your budget on IHCDA Online in order to claim correctly, please complete the Budget Modification Form found on IHCDA's HOPWA webpage and send via email to your Grants Analyst for assistance.

- ***May I claim staff time (and subsequent fringe and benefits) on STRMU?***
  - Staff time associated with STRMU activities is eligible under "Short-Term Program Delivery."
  - If you need to amend your budget on IHCDA Online in order to claim correctly, please complete the Budget Modification Form found on IHCDA's HOPWA webpage and send via email to your Grants Analyst for assistance.

- ***Are there any instances in which a client's move-in costs (i.e. moving truck or packing costs) or personal items (i.e. clothing, furnishings, non-food personal care or household items) could be eligible in the HOPWA program?***
  - The purchase of these items for clients are unallowable in the HOPWA program. Other the exception outlined in the "Facility Operations and Facility Based Assistance section of this manual, no line-item allows for the purchases of these goods or services. If expenses are incurred, they should be charged to another funding source.

TBRA

- ***Are there term limits on HOPWA TBRA?***
  - Currently, neither HUD nor IHCDA has instituted a term limit on the amount of time a client/household may receive HOPWA TBRA. If a Project Sponsor identifies instances in which a term limit is appropriate, policies must be in place in accordance to the considerations highlighted in the "TBRA Term Limits" section of this manual.

- ***Can a rental payment for a unit owned by a client's relative be an allowable expense?***
  - Generally, the answer is no, as indicated in the "Eligible Expenses" section of this manual. However, an exception to this rule can be made as a reasonable accommodation.
  - A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common-use spaces. The key to demonstrating that the requested accommodation may be necessary is that there must be an identifiable relationship between the requested accommodation and the individual's disability. For example, if a client requests to rent from a relative, the reasonable accommodation documentation should demonstrate that the housing needs of a person with a specific disability can only be addressed by

renting a unit from the relative. While reasonable accommodation requests may be made by the family verbally or in writing, requests must be accompanied by documentation from a physician or health professional that supports the need for the HOPWA family to rent from a relative.

- When it comes to renting from a relative who is residing in the same unit as the HOPWA-eligible person, a reasonable accommodation also results in the income of the relatives is not counted when determining eligibility for HOPWA assistance. This reasonable accommodation exception is not exclusive to administering HOPWA TBRA. When a HOPWA program has determined that there is an identifiable relationship between the requested accommodation and a client's disability, it may be possible to also approve the reasonable accommodation and use STRMU in the unit.

- ***Can HOPWA clients participate in shared housing options?***
  - Yes, so long as client voluntarily elects to pursue shared housing. The Project Sponsor should not otherwise force a client into this living situation.
  - While HOPWA regulations are silent regarding space and security housing standard requirements in shared housing, HOPWA follows the Housing Choice Voucher (HCV) program to the extent practicable. 24 CFR 982.618(d)(2)(ii) of HCV regulations for shared housing standards stipulate that "the private space for each assisted family must contain at least one bedroom for each two persons in the family. The number of bedrooms in the private space of an assisted family may not be less than the family unit size." Therefore, if looking to HCV regulations for guidance when HOPWA regulations are silent, HOPWA TBRA-assisted families cannot share a bedroom with a non-family member without violating space and security requirements, as sharing a bedroom with a non-family member does not provide a private space for the assisted family.
  - Shared housing within the HOPWA program can occur so long as the unit has more than one bedroom. Additionally, there would need to be sufficient bedrooms/sleeping areas for the individual/family members based on your local public housing authority/HUD guidelines. In accordance with 24 CFR982.306(d), if the owner of the dwelling lives in the shared unit and is the parent, child, grandparent, grandchild, or sibling of any member of the family, then HOPWA funding **should not** be used to pay rent and utility assistance **unless** it is determined that approving the unit would provide reasonable accommodation for a family member who is a person with disabilities. If this is the case, a waiver of this rule may be requested through the local HUD Field Office. The Project Sponsor should obtain a written rental agreement from the family and maintain this in the client file for documentation purposes.

STRMU

- ***Can we provide STRMU assistance to clients who live in mobile homes, trailers, and motor homes?***
    - Yes, according to the response in this HOPWA FAQ, assistance for clients living in mobile homes, trailers, and motor homes is eligible in some situations. If the applicant presents documentation demonstrating a need for STRMU, STRMU payments for up to 21 weeks of assistance can be administered. Additional guidance on how to administer this assistance can be found in the HOPWA STRMU Guidebook posted on the HUD Exchange and on IHCDA's website.

- ***The 21-week STRMU term for a client household is coming to an end. What other options are there?***
    - If the household in question received STRMU rental assistance, other types of long-term permanent housing assistance should be employed. Examples may include:
        - HOPWA Project-Based or Tenant-Based rental assistance and facility-based housing
        - Housing Choice Vouchers (formerly Section 8)
        - HUD-Veterans Affairs Supportive Housing (HUD-VASH)
        - Continuum of Care (CoC) Program
        - Public Housing
        - HOME Investment Partnerships Program
        - Section 811 Supportive Housing for Persons with Disabilities Program
        - Section 202 Supportive Housing for the Elderly Program
        - Low-income Housing Tax Credits
        - United States Department of Agriculture Housing Assistance
        - Other state and local resources, when available
    - In special circumstances, HUD may approve waivers of the time limited 21-week eligible STRMU period (24 CFR 574.330). Approved waivers are per individual household. During the decision-making process, HUD considers the "good faith effort" of a Project Sponsor to provide permanent housing… (that allows) each individual living in such housing the opportunity for placement in permanent housing or in a living environment appropriate to his or her health and social needs." (24 CFR 574.330(a)(2); 24 CFR 574.330(c)) This will require review of the individual household's housing and services plan, evidence that no other appropriate housing options would maintain an adequate and stable living arrangement during this period, and other information requested by HUD. Additionally, Project Sponsors may be asked to demonstrate that the STRMU-assisted household in question currently meets housing quality standards.[33]

[33] Once NSPIRE is effective, regulations, notices, and guidance may update this stipulation.

Information on STRMU waivers can be found on page 24-27 of HUD's STRMU Guide Book.

- If a Project Sponsor identifies that a waiver is needed for an individual household, please contact your Grants Analyst so that we may work with our local HUD Representative to discuss the waiver process. Regardless of the result of the waiver request, the Project Sponsor should maintain appropriate documentation of this exchange.

Supportive Services

- ***I have an expense that doesn't readily fit into the pre-approved expenses offered in this manual. Is there any flexibility on what we can use our Supportive Services funding for?***
    - There is a process for determining the eligibility of miscellaneous expenses associated with supportive services. In some cases, IHCDA can quickly provide guidance on whether the expense is eligible, the documentation requirements associated with the expense and how to claim the expense. However, if the expense requires approval from our HUD-CPD Office or the Office of HIV/Housing, IHCDA will let the Project Sponsor know and will ask for additional information as needed.

- ***A client of ours needs bed bug treatments done for their HOPWA-assisted residence. Is this an eligible expense? If yes, what considerations should we take to successfully claim on this item?***
    - This expense is eligible for HOPWA Supportive Services as a health-related support. Please note that should Supportive Services be utilized for this purpose, there is a monetary cap of $2,000 per HOPWA-assisted unit. If the cost surpasses $2,000, the remaining cost will fall on the Project Sponsor.
    - The following list of conditions must all be met before use of HOPWA funding could be used:
        - The signed lease specifically mentions that the tenant is responsible for bed bug treatment; and
        - It is documented that no other funding sources can pay for the expense.
    - If the landlord treats the building, Project Sponsors must then collect documentation showing that the tenant is only charged their prorated portion of the expense. The landlord wouldn't be subject to procurement policies in 2 CFR 200 since they are not a Project Sponsor.
    - If the tenant is responsible for treating their own unit and the Project Sponsor wanted/needed to assist them with HOPWA as no other source is available, they would need to follow procurement policies defined by both 2 CFR 200 and the Project Sponsor's procurement policy at this point since the Project Sponsor is undertaking the activity on behalf of the client.
    - If Project Sponsors need assistance in determining whether HOPWA Supportive Services may be used to pay for bed bug treatments, please contact IHCDA Community Services or your Grants Analyst.

Appendices

Appendix A: IHCDA Forms

The following forms are available on IHCDA's HOPWA webpage:

- Claims Narrative Form
- Budget Modification Form
- Limited Exception to Rent Standard Tracker Sheet[34]
- Program Income and Admin Spending Report Form
- IHCDA HOPWA Annual Close Out Form

Appendix B: Client Forms and Resources

The following forms must be in each client's file and are available on IHCDA's HOPWA webpage:

- Statement of HIV Verification
- HOPWA Rent and Income Calculation Form: TBRA and PBRA
- HOPWA Rent and Income Calculation Form: STRMU
- Shared Housing Rent Calculation Sheet
- Zero Income Affidavit[35]
- HOPWA Permission to Release Confidential Information to Secure Necessary Services
- Suggested HOPWA Forms of Income Verification and Documentation of Expenses

The list below is a *sample* of the forms or documentation that must be created and maintained by the Project Sponsor:

- Housing Application and Assessment
- Program Service Agreement(s)
- Housing Plan/Individual Case Management Service Plan
- Any grievances filed[36]
- Signed termination form[37]

Appendix C: VAWA Forms and Resources

The following VAWA Forms and Resources are available IHCDA's HOPWA webpage:

- HUD-5380: Rights for Survivors
- HUD-5381: Model Emergency Transfer Plan
- HUD-5382: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- HUD-5383: Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

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[34] Required only for Project Sponsors utilizing exceptions under 24 CFR 574.320(a)(2).
[35] Only required if applicable to the client's circumstances.
[36] Only required if applicable to the client's circumstances.
[37] Only required if applicable to the client's circumstances.

- VAWA Lease Addendum
- Additional VAWA Resources from HUD

Appendix D: Lead-Based Paint Forms and Resources

The following Lead-Based Paint form Forms and Resources are available IHCDA's HOPWA webpage:

- Lead-Based Paint Brochure: "Protect Your Family in the Home"
- Lead-Based Paint Exemption Form (required for all units)
- Lead-Based Paint Disclosure Form
- Lead-Based Paint Ongoing Agreement Form

Appendix E: Required TBRA and PBRA Forms and Documentation

To ensure compliance with administrative requirements associated with TBRA and PBRA, IHCDA has created a table/checklist of all relevant forms and documentation to complete or compile in a client's file. Please see below:

	Name of Form or Document Required
Client Forms/Documentation	
	Housing Application and Assessment
	Statement of HIV Verification Form OR another form of documentation confirming proof of HIV status or AIDS Diagnosis [38]
	HOPWA Rent and Income Calculation Form: TBRA and PBRA
	HOPWA Zero Income Affidavit[39]
	Documented Medical Insurance
	Program Service Agreement(s)
	Housing Plan/Individual Case Management Service Plan
	HOPWA Permission to Release Confidential Information to Secure Necessary Services (or any other release of information authorization as needed to be granted by client)
	Any grievances filed[40]
	Signed termination form[41]
Housing Documentation	
	Smoke Detector Certification
	Carbon Monoxide Alarm or Detector Certification[42]

[38] See "Demonstrating Client Eligibility in HOPWA and Other Programs" section of manual for more guidance.
[39] Only required if applicable to the client's circumstances.
[40] Only required if applicable to the client's circumstances.
[41] Only required if applicable to the client's circumstances in the "Termination of Assistance" section of manual.
[42] Self-certification for this requirement suffices.

	Housing Quality Standards (HQS), signed and dated before lease is signed[43]
	HOPWA NSPIRE Checklist[44]
	Signed Lease
	Project Sponsor/Client contract (RAP agreement)
	Project Sponsor/Landlord contract (RAP agreement)
	Housing Service Plan
	Copy of Reasonable Accommodation documentation (if applicable)
	Shared housing rent calculation (if applicable to client's circumstances)
	Rent Standard and Rent Reasonableness Verification
	FMR Exception Tracker Sheet (required if Project Sponsor implements FMR exception advertised in 24 CFR 574.320(a)(2))
	Evidence of completing rent reasonableness checks via use of affordablehousing.com
	Copies of cleared checks
VAWA Documentation	
	VAWA Lease Addendum (required for all clients served)
	Confirm receipt of HUD-5380: Rights for Survivors **and** HUD-5381: Model Emergency Transfer Plan (required for all clients served)
	HUD-5382: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[45]

[43] Applicable only for clients placed in unit before February 2, 2026.
[44] Applicable only for clients placed in unit after February 2, 2026.
[45] Only required if applicable to the client's circumstances.

	HUD-5383: Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[46]
Lead-Based Paint Documentation	
	Confirm Receipt of "Protect Your Family in the Home" Lead-Based Paint Brochure (required for all units)
	Lead-Based Paint Exemption Form (required for all units)
	Lead-Based Paint Disclosure Form[47]
	Lead-Based Paint Ongoing Agreement Form[48]

[46] Only required if applicable to the client's circumstances.
[47] Only required if it is determined through the completion of the Exemption form listed above that the unit is **not** exempt from lead-based paint requirements.
[48] Only required if the unit is determined to **not** be exempt from lead-based paint requirements **and** on-going work is being done to address lead-based paint in the home/unit.

Appendix F: Required STRMU Forms and Documentation

To ensure compliance with administrative requirements associated with STRMU, IHCDA has created a table/checklist of all relevant forms and documentation to complete or compile in a client's file. Please see below:

	Name of Form or Documentation Required
Client Forms/Documentation	
	Housing Application and Assessment
	Statement of HIV Verification Form **OR** another form of documentation confirming proof of HIV status or AIDS Diagnosis[49]
	HOPWA Rent and Income Calculation Form: STRMU
	HOPWA Zero Income Affidavit[50]
	Documentation of Emergency Need – **see STRMU Eligibility Criteria section of manual**
	Documented Medical Insurance
	Program Service Agreement(s)
	Housing Plan/Individual Case Management Service Plan
	HOPWA Permission to Release Confidential Information to Secure Necessary Services (or any other release of information authorization as needed to be granted by client)
	Any grievances filed[51]
	Signed termination form[52]
Housing Documentation	

[49] See "Demonstrating Client Eligibility in HOPWA and Other Programs" section of manual for more guidance.
[50] Only required if applicable to the client's circumstances.
[51] Only required if applicable to the client's circumstances.
[52] Only required if applicable to the client's circumstances in the "Termination of Assistance" section of manual.

	Lease or Mortgage for applicable unit[53]
	Documentation demonstrating proof of responsibility to make utility payments **OR** showing that an account in the name of the client exists
	Copy of Reasonable Accommodation documentation (if applicable)
	Smoke Alarm or Detector Certification[54]
	Carbon Monoxide Alarm or Detector Certification[55]
	Verifying compliance with Mobile/Manufactured Home Requirements, if applicable[56]
	Copies of cleared checks
	21-Week Tracking Sheet
Lead-Based Paint Forms	
	Confirm Receipt of "Protect Your Family in the Home" Lead-Based Paint Brochure (required for all units)
	Lead-Based Paint Exemption Form (required for all units)
	Lead-Based Paint Disclosure Form[57]
	Lead-Based Paint Ongoing Agreement Form[58]
VAWA Documentation	

[53] Per page 24 of the HOPWA Rental Assistance Guidebook, a client may also be referenced in the valid lease as an occupant. Additionally, documentation such as a deed of trust or title insurance policy may also serve to as evidence that the client is the owner of mortgaged real property.
[54] While the HOPWA NSPIRE notice confirms that STRMU-assisted units are not required to have units inspected for NSPIRE, the notice does require STRMU-assisted units to confirm that these are present and functionable.
[55] Self-certification for this requirement suffices. While the HOPWA NSPIRE notice confirms that STRMU-assited units are not required to have units inspected for NSPIRE, the notice does require STRMU-assisted units to confirm that these are present and functionable.
[56] See STRMU FAQ section of manual for more information.
[57] Only required if it is determined through the completion of the Exemption form listed above that the unit is **not** exempt from lead-based paint requirements.
[58] Only required if it is determined through the completion of the Exemption form listed above that the unit is **not** exempt from lead-based paint requirements **and** on-going work is being done to address lead-based paint in the home/unit.

	VAWA Lease Addendum (required for all units)
	Confirm receipt of HUD-5380: Rights for Survivors **and** HUD-5381: Model Emergency Transfer Plan (required for all clients served)
	HUD-5382: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[59]
	HUD-5383: Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[60]

[59] Only required if applicable to the client's circumstances.
[60] Only required if applicable to the client's circumstances.

Appendix G: Required Facility-Based Assistance/Operations Forms and Documentation

To ensure compliance with administrative requirements associated with Facility-Based Assistance/Operations, IHCDA has created a table/checklist of all relevant forms and documentation to complete or compile in a client's file. Please see below:

	Name of Form or Document Required
Client Forms/Documentation	
	Housing Application and Assessment
	Statement of HIV Verification Form **OR** another form of documentation confirming proof of HIV status or AIDS Diagnosis [61]
	HOPWA Rent and Income Calculation Form: TBRA and PBRA
	HOPWA Zero Income Affidavit[62]
	Documented Medical Insurance
	Program Service Agreement(s)
	Housing Plan/Individual Case Management Service Plan
	HOPWA Permission to Release Confidential Information to Secure Necessary Services (or any other release of information authorization as needed to be granted by client)
	Any grievances filed[63]
	Signed termination form[64]
Housing Documentation	
	Smoke Detector Certification
	Carbon Monoxide Alarm or Detector Certification[65]

[61] See "Demonstrating Client Eligibility in HOPWA and Other Programs" section of manual
[62] Only required if applicable to the client's circumstances.
[63] Only required if applicable to the client's circumstances.
[64] Only required if applicable to the client's circumstances in the "Termination of Assistance" section of manual.
[65] Self-certification for this requirement suffices.

	Housing Quality Standards (HQS), signed and dated before lease is signed[66]
	HOPWA NSPIRE Checklist[67]
	Signed Lease between Project Sponsor and Client **OR** Occupancy Agreement between Project Sponsor and Client
	Housing Service Plan
	Copy of Reasonable Accommodation documentation (if applicable)
	Shared housing rent calculation (if applicable to client's circumstances)
	Rent Standard and Rent Reasonableness Verification
	FMR Exception Tracker Sheet (required if Project Sponsor implements FMR exception advertised in 24 CFR 574.320(a)(2))
	Copies of cleared checks
VAWA Documentation	
	VAWA Lease Addendum (required for all clients served)
	Confirm receipt of HUD-5380: Rights for Survivors **and** HUD-5381: Model Emergency Transfer Plan (required for all clients served)
	HUD-5382: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[68]
	HUD-5383: Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[69]
Lead-Based Paint Documentation	
	Confirm Receipt of "Protect Your Family in the Home" Lead-Based Paint Brochure (required for all units)

[66] Applicable only for clients placed in unit before February 2, 2026.
[67] Applicable only for clients placed in unit after February 2, 2026.
[68] Only required if applicable to the client's circumstances.
[69] Only required if applicable to the client's circumstances.

	Lead-Based Paint Exemption Form (required for all units)
	Lead-Based Paint Disclosure Form[70]
	Lead-Based Paint Ongoing Agreement Form[71]
Miscellaneous Facility Operations Documentation	
	Any agreements in place for the provision of a range of services in-house or with qualified service providers, regardless of amounts paid for services
	Any bids obtained for services above $15,000 – **see "Facility Operations and Facility-Based Assistance" section of manual for more information.**

[70] Only required if it is determined through the completion of the Exemption form listed above that the unit is **not** exempt from lead-based paint requirements.

[71] Only required if the unit is determined to **not** be exempt from lead-based paint requirements **and** on-going work is being done to address lead-based paint in the home/unit.

Appendix H: Required Permanent Housing Placement Forms and Documentation

To ensure compliance with administrative requirements associated with Permanent Housing Placement, IHCDA has created a table/checklist of all relevant forms and documentation to complete or compile in a client's file. Please see below:

	Name of Form or Document Required
Client Forms/Documentation	
	Housing Application and Assessment
	Statement of HIV Verification Form OR another form of documentation confirming proof of HIV status or AIDS Diagnosis[72]
	HOPWA Rent and Income Calculation Form: TBRA and PBRA
	HOPWA Zero Income Affidavit[73]
	Documented Medical Insurance
	Program Service Agreement(s)
	Housing Plan/Individual Case Management Service Plan[74]
	HOPWA Permission to Release Confidential Information to Secure Necessary Services (or any other release of information authorization as needed to be granted by client)
	Any grievances filed[75]
	Signed termination form[76]
Housing Documentation	
	Smoke Detector Certification[77]

[72] See "Demonstrating Client Eligibility in HOPWA and Other Programs" section of manual.
[73] Only required if applicable to the client's circumstances.
[74] Project Sponsors should review file and determine whether housing and utilities costs are within a range that the client can afford and remain stably housed based on their financial situation.
[75] Only required if applicable to the client's circumstances.
[76] Only required if applicable to the client's circumstances.
[77] While the HOPWA NSPIRE notice confirms that units exclusively assisted with PHP are not required to have units inspected for NSPIRE, the notice does require these units to confirm that these are present and functionable.

	Carbon Monoxide Alarm or Detector Certification[78]
	Project Sponsor/Landlord contract (RAP agreement)
	Habitability Housing Inspection completed: signed and dated (before lease is signed)[79]
	Housing Service Plan
	Copy of Reasonable Accommodation documentation (if applicable)
	Shared housing rent calculation (if applicable to client's circumstances)
	Rent Standard and Rent Reasonableness Verification[80]
	Rent Standard Exception Tracker Sheet (required if Project Sponsor implements exception advertised in 24 CFR 574.320(a)(2))[81]
	Copies of cleared checks, bills, receipts
VAWA Documentation	
	VAWA Lease Addendum (required for all clients served)
	Confirm Receipt of HUD-5380: Rights for Survivors **and** HUD-5381: Model Emergency Transfer Plan (required for all clients)
	HUD-5382: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[82]
	HUD-5383: Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking[83]

[78] Self-certification of this requirement suffices. While the HOPWA NSPIRE notice confirms that units exclusively assisted with PHP are not required to have units inspected for NSPIRE, the notice does require these units to confirm that these are present and functionable.
[79] Unit standards such as Habitability Standards, Housing Quality Standards (HQS), and National Standards for the Physical Inspection of Real Estate (NSPIRE) do not apply for PHP unless the assistance will be leveraged with other forms of federal housing assistance such as HOPWA TBRA.
[80] Only required if client will also receive ongoing HOPWA TBRA.
[81] Only required if client will also receive ongoing HOPWA TBRA.
[82] Only required if applicable to the client's circumstances.
[83] Only required if applicable to the client's circumstances.

Lead-Based Paint Documentation	
	Confirm Receipt of "Protect Your Family in the Home" Lead-Based Paint Brochure (required for all units)
	Lead-Based Paint Exemption Form (required for all units)
	Lead-Based Paint Disclosure Form[84]
	Lead-Based Paint Ongoing Agreement Form[85]
Miscellaneous Documentation	
	Documentation of new unit address and details of the costs for move-in assistance and other forms of eligible expenses associated with Permanent Housing Placement
	Evidence via client records confirming that PHP costs paid with HOPWA funding did not exceed 2 months of rental value of the new living unit.

[84] Only required if the unit is determined to **not** be exempt from lead-based paint requirements.
[85] Only required if the unit is determined to **not** be exempt from lead-based paint requirements **and** on-going work is being done to address lead-based paint in the home/unit.

Appendix I: HOPWA Claims Supporting Documentation Chart

The chart below outlines the supporting documentation required for each claim submission. For every eligible expense a Project Sponsor claims, they are **REQUIRED** to provide **proof of payment** alongside their completed HOPWA Claims Narrative Form. Project Sponsors are also **REQUIRED** to **redact all personally identifiable information (PII)** during the claims submission process and instead **use the clients' HMIS ID numbers** on all supporting documentation. Fully complying with the supporting documentation requirements will reduce the likelihood of a Project Sponsor's claims being denied and ensure that Project Sponsors are promptly reimbursed.

Eligible Expense	Acceptable Documents to show **Proof of Payment**
Tenant-Based Rental Assistance (TBRA)	
Rental Payments **Utility Payments**	Provide **ONE** of the following, with PII redacted in favor of HMIS Client ID: • Copy of a check to landlord/business • Itemized confirmation of online payment indicating landlord/business name, payment amount, date of payment • Copy of bank statement that details: landlord/business name, payment amount, date of payment • Copy of landlord/business receipt
Short-Term Rent, Mortgage, and Utilities (STRMU)	
Rental Payments **Utility Payments** **Mortgage Payments**	Provide **ONE** of the following, with PII redacted in favor of HMIS Client ID: • Copy of a check to landlord/business • Itemized confirmation of online payment indicating landlord/business name, payment amount, date of payment • Copy of bank statement that details: landlord/business name, payment amount, date of payment • Copy of landlord/business receipt
Long-Term Program Delivery	
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with

Staff Mileage	Provide **ONE** of the following: • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Short-Term Program Delivery	
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with
Staff Mileage	Provide **ONE** of the following: • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Supportive Services	
Supplies (i.e. food, cell phones, ride share fees or bus tickets, or other eligible supplies) **Healthcare Costs** **Third-party vendor/contractor** *Documentation associated with bid process is not required in claim submissions but must be kept on file.	Provide **ONE** of the following, with PII redacted in favor of HMIS Client ID: • Itemized receipt • Itemized confirmation of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, date of payment & client ID • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable)

Staff time **Fringe** **Benefits**	<u>Provide the following:</u> • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with
Staff Mileage	<u>Provide **ONE** of the following:</u> • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Facility Operations and Facility-Based Assistance	
Staff Time **Fringe** **Benefits**	<u>Provide the following:</u> • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with
Staff Mileage	<u>Provide **ONE** of the following:</u> • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate

Third-party Vendor or Contracting *Documentation associated with bid process is not required in claim submissions but must be kept on file.	Provide **ONE** of the following: • Itemized receipt • Copy of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, and date of payment • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) ***If the cost of an expense claimed is over $15,000, approval must be granted via email from IHCDA Community Services and documented in claims submission.**
Rent and/or Utilities of Project Sponsor-run Facility (not associated with a specific unit/client) **Insurance** (online or in-person purchase) **Supplies** **Equipment*** **Basic Furnishings***	Provide **ONE** of the following: • Itemized receipt • Copy of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, & date of payment ***If the cost of a basic furnishing or equipment expense claimed is over $15,000, approval must be granted via email from IHCDA Community Services and documented in claims submission.**
Rental Payments **Utility Payment** (for Clients in Project Sponsor's Housing Facility OR Project-Based Rental Assistance)	Provide **ONE** of the following, with any PII redacted in favor of HMIS Client ID: • Copy of a check to landlord/business • Itemized confirmation of online payment indicating landlord/business name, payment amount, date of payment • Copy of bank statement that details: landlord/business name, payment amount, date of payment • Copy of landlord/business receipt
Housing Information Services	
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with

Staff Mileage	Provide **ONE** of the following: • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Permanent Housing Placement (PHP)	
Application Fees **Administrative fees in lieu of or in addition to a security deposit** **Security Deposit** **Utility Deposit** **Utility Hookup Fee** (one time) **Utility Arrears** *Documentation that demonstrates need for arrears must be in client files. **Credit Check Expenses** **First/Last Month's Rent** **Renter's Insurance** (first month or initial term) **Rent Arrears** *Documentation that demonstrates need for arrears must be in client files. **Mediation Services** (neighbor/landlord issues at time of placing a client into the unit only)	Provide **ONE** of the following with any PII redacted in favor of HMIS Client ID: • Copy of check • Copy of online payment indicating landlord/business name, payment amount, date of payment • Copy of bank statement that details: landlord/business name, payment amount, date of payment, and Client ID • Copy of landlord receipt

Representative Payee Services for SSI benefits *Depending on cost, documentation associated with bid process is not required in claim submissions but must be kept on file.	Provide **ONE** of the following with any PII redacted in favor of HMIS Client ID: • Itemized receipt • Copy of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, date of payment & client ID
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with
Staff Mileage	Provide **ONE** of the following: • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Resource Identification	
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with

Third-party Vendor or Contracting *Documentation associated with bid process is not required in claim submissions but must be kept on file.	Provide **ONE** of the following: • Itemized receipt • Copy of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, and date of payment • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) ***If the cost of an expense claimed is over $15,000, approval must be granted via email from IHCDA Community Services and documented in claims submission.**
Staff Mileage	Provide **ONE** of the following: • Paystub/earning statement indicating employee employee/contractor name, pay period, & indication that employee was reimbursed for mileage • Copy of check demonstrating that the employee was reimbursed for the mileage expense **AND** • Copy of mileage reimbursement report indicating name of employee(s), date of drive/transportation, miles travelled, and the per mile compensation rate
Administration	
Staff time **Fringe** **Benefits**	Provide the following: • Paystub/earning statement indicating employee/contractor name, pay period, pay date, & hourly rate (if applicable) **AND** • Individual employee or master timesheet indicating employee/contractor name, hours worked, dates for those hours, and budget line-item/HOPWA activity that claimed time is associated with
HOPWA-specific Trainings (only eligible if approval from HUD was granted)	Provide **ONE** of the following: • Itemized receipt • Itemized confirmation of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, date of payment, & client ID **AND** • Written documentation indicating that HUD approval for expenses associated with training was granted

Office Supplies and Postage	Provide **ONE** of the following: • Itemized receipt • Itemized confirmation of online payment indicating company name, payment amount & date of payment • Copy of bank statement that details: company name, payment amount, & date of payment

Appendix J: Relevant Regulations, Notices, and Rules

The following list includes a *sample* list of regulations, notices, and rules that govern the administration of the HOPWA program:

- AIDS Housing Opportunity Act
- 2 CFR 200: Regulations governing the financial management of programs receiving federal funds
- 24 CFR 574: Regulations governing the HOPWA program
- 24 CFR Part 5 Subpart L: Violence Against Women Act
- 24 CFR Part 100: Fair Housing Act

Appendix K: Miscellaneous Handouts and Resources

The following resources are available IHCDA's HOPWA webpage:

- HUD Fair Market Rents
- Rent Reasonable Checks via affordablehousing.com[86]
- STRMU Guidebook
- HOPWA Rental Assistance Guide Book
- Permanent Housing Placement Factsheet
- Income Calculation Training
- HOPWA Claims Supporting Documentation Chart

[86] To coordinate the proper access for each staff member at your agency, please contact IHCDA Community Services for assistance.