HOPWA FY 2025 Webinar

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OVERVIEW:

Review of HOPWA and Client Eligibility Criteria

Status of FY 2025 Awards

Eligible Expenses

Claim Submission Guidelines

Requirements & Policies

- Rent Standards
- HMIS + Data Entry
- Confidentiality
- VAWA in the HOPWA Program
- General Client Documentation Requirements
- Reporting Requirements
- Award Closeout
- Monitoring

Updates from IHCDA

Questions



HOPWA CLIENT HOUSEHOLD ELIGIBILITY:

One individual in the household living with HIV/AIDS, regardless of the individual's age.

Income level of 80% AMI or less

Physically located within the Indiana Balance of State's jurisdiction

Documentation confirming eligibility must be on file.



STATUS OF FY 2025 AWARDS:

Signed agreements

Awards Created and Funded on IHCDA Online

Emails on late claim approval



HOPWA ELIGIBLE EXPENSES:

Long-Term Rental Assistance (TBRA)

Long-Term Program
Delivery

Short-Term Rent, Mortgage, Utilities Short-Term Program Delivery

Facility
Operations/Facility
Based Assistance

Housing Information Services

Permanent Housing Placement

Supportive Services

Resource Identification (New for FY2025)

Administration



TBRA – ELIGIBLE EXPENSES:

Tenant Based Rental Assistance (TBRA) – ongoing monthly rent/utility assistance to clients for rental housing.

No federal or state level-imposed term limit at this time. However, Project Sponsors may impose a term limit if needed. Details about this are in 2025 HOPWA Manual.



TBRA CLIENT ELIGIBILITY:

Meet HOPWA Client Eligibility Criteria

Must not own a home

Must not currently receive or expect to receive a rental subsidy from other federal, state, or local sources

TBRA – INELIGIBLE EXPENSES:

Late fees caused by late payment to the Landlord by the Project Sponsor

Rent for a unit owned by a client's relative*

Security deposit

Expenses due to repairs or damage

Mortgage Expenses



LONG-TERM PROGRAM DELIVERY:

Long-Term Program Delivery includes staff time, fringe and benefit costs directly related to administering Long-Term Rental Assistance.

- Examples of eligible Expenses:
 - Staff time spent verifying rent reasonableness
 - Mileage to perform housing inspections
- Direct rent/utilities assistance to clients is not eligible under "Long-Term Program Delivery"



STRMU:

Preventative program that provides mortgage, rent and utility assistance.

 Impact can be comparable to homelessness prevention work in CoC and ESG

Time Limit: Up to 21 weeks in a 52-week period

- Period of assistance begins on the day that the first payment is made.
- One month of assistance rounds to 4 weeks of assistance; yields a maximum total of 5 months of assistance.

NOT subject to FMR and Rent Reasonableness Requirements



STRMU CLIENT ELIGIBILITY CRITERIA:

HOPWA eligibility criteria is met

Have a lease or mortgage on file

Household needs to demonstrate need for STRMU assistance specifically:

- Other resources will not help address housing costs
- Household is at risk of homelessness if assistance isn't administered
- STRMU assistance will alleviate any payment delinquency to avoid eviction and result (at least) in temporary stability for that household
- Household's ongoing needs assessed in connection with the development of an individual housing and services plan for the household.



STRMU – INELIGIBLE EXPENSES:

Realtor Fees

Moving assistance

Security Deposit

Late fees caused by late payment to the Landlord by the Project Sponsor

Auto-repair expenses

Expenses associated with internet, cable, or phone services

Assistance that occurs over a period of more than 21 weeks in any 52-week period



SHORT-TERM PROGRAM DELIVERY:

Includes staff time, fringe, and benefits directly related to administering Short-Term Rent, Mortgage, and Utility Assistance.

Direct rent/utilities/mortgage assistance to clients is not eligible under "Short-Term Program Delivery"



COMPARISON: TBRA & STRMU

FEATURES	STRMU	TBRA
Type of Assistance	Preventive	Permanent
Goal	Provide short-term stabilizing intervention	Subsidize long-term, safe and affordable occupancy
Eligibility	Legally housed HOPWA-eligible homeowners and renters who have evidence of need	HOPWA-eligible household with annual income verification
Term	21 weeks in a 52-week period	Ongoing, year-round
Eligible Assistance Costs	Mortgage, rent, and utility costs	Rent and utility costs
Amount of Assistance Payments	Determined by provider's assessment of individual household need and actual housing costs (must be reasonable)	Rent calculation defined by regulation and based on household income, rent standard, rent reasonableness, and utility allowances
Coordination & Services	Housing and service needs assessment required	Housing and service needs assessment required





HOPWA AWARD COMPONENTS

Supportive Services – Time spent by staff to improve a client's access to care/services related to:

- Health/Mental Health*
- Assessment
- Drug and alcohol abuse treatment and counseling
- Day care
- Personal assistance
- Nutritional services
- Intensive care when required
- Assistance in accessing local, State and Federal government benefits and services

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Regulation: <u>24 CFR 574.300(b)(7)</u>

SUPPORTIVE SERVICES:

Additional eligible expenses*:

- Transportation
- Education
- Employment Assistance and training for PLWHA
- Legal Services (relating to housing issues only)
- Life skills management
- Cell phone purchase and cell service see manual for more guidance
- Outreach see manual for more guidance
- Staff time, fringe, benefits associated with administering supportive services

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Other activities for supportive housing services with prior HUD approval

^{*}Per guidance from HUD's HOPWA Grantee Oversight Guide

HOUSING INFORMATION SERVICES:

Housing Information Services – Staff time determining the best type(s) of HOPWA assistance to administer to each client.

- Also allows housing counseling, information, or referral services to locate, acquire, finance, and maintain housing;
- informational materials (i.e. fair housing guidance) that educate clients on housing resources; may also include fair housing counseling if meeting 24 CFR 5.111.

Source: eCFR :: 24 CFR 574.300 -- Eligible activities.;

eCFR :: 24 CFR 5.111 -- Housing counseling.



PERMANENT HOUSING PLACEMENT:

Helps clients establish a new residence where ongoing occupancy is expected to continue.

Can help those who faced an eviction or especially benefit relocating clients in emergency situations (i.e. natural disasters) or in need of protections provided by the Violence Against Women Act (VAWA)

No limits imposed on federal or state level on number of times a HOPWA-eligible family can access PHP. If Project Sponsors limit this, they must follow guidance in the 2025 manual.



PERMANENT HOUSING PLACEMENT:

Eligible Expenses:

- Application fees
- Administrative fees in lieu or in addition to a security deposit
- Credit check expenses
- First/last month's rent
- Housing referrals
- Mediation services related to neighbor/landlord issues at the time of placing client in unit only
- One-time utility connection fees
- Payment for representative payee services
- Rental insurance (first month or initial term)
- Tenant counseling
- Rent/utility arrears when a barrier to establishing new permanent housing
- Security deposits less than 2 months' rent and not exceed any state/local cap on assistance
- Staff salary, fringe, benefits associated with PHP
- Utility deposit and one-time utility hookup fees



PERMANENT HOUSING PLACEMENT:

Ineligible Expenses:

- First and/or last month's rent when a person already has a rental subsidy
- Housing supplies and goods
- Moving services and packing materials
- Regular recurring costs (i.e. ongoing rent, utilities, insurance, etc.)
- Repairs to the unit associated with the move-in
- Security deposits greater than 2 months' rent
- Smoke alarms
- Staff time, fringe, and benefits NOT associated with PHP work
- Storage fees
- Standard household furnishings
- Renter's insurance after first month or initial term payment



FACILITY OPERATIONS AND FACILITY BASED ASSISTANCE:

Facility Based Assistance – Housing connected with a specific facility or project. Can administer some form of project-based rental assistance.

Eligible Expenses:

- Facility-based housing rental assistance, including master-leased units and project-based rental assistance;
- Operating costs for housing including maintenance, security, operation, insurance, utilities, furnishings, equipment, supplies, and other incidental costs.

Facility Operating Costs must be reasonable and necessary.

- Documentation is required to be on file at the site
- Approval from IHCDA Community Services team needed on purchases over \$15,000
- If the cost of the service will be more than \$15,000, a minimum of two (2) bids are required.
- If costs are over \$30,000, a minimum of three (3) bids are required prior to the service being completed.



FACILITY OPERATIONS AND FACILITY BASED ASSISTANCE:

Facility Based Assistance – Housing connected with a specific facility or project. Can administer some form of project-based rental assistance.

Ineligible Expenses:

- Rental assistance NOT specified for a dedicated unit (i.e. tenant based rental assistance)
- Assistance to a facility that does not serve as housing, such as an office
- Acquisition, rehabilitation, conversion, lease, or repair of facilities to provide housing and services
- New construction of single-room occupancy units or community residences
- Replacement or repair of objects or items that are permanent fixtures of the building



RESOURCE IDENTIFICATION:

Systems-level activity that allows Grantees and Project Sponsors to build and improve their community response to expand access to housing and HIV treatment.

Eligible expenses:

- Identifying and tracking housing resources for current/future clients
- Strengthening relationships with local landlords, PHAs, and other local and state affordable housing partnerships
- Attending housing-related meetings such as Regional Planning Council meetings on your agency's behalf
- Coordinating housing case management efforts across HOPWA and Ryan White-provider networks
- Collecting and analyzing local HIV housing data
- HIV housing needs assessments done by third party consultant or contractor



RESOURCE IDENTIFICATION:

Funding in this line item may **NOT** be used to directly serve clients.

Please utilize other budgetary line-items to stay in compliance
 or work with Analyst to amend budget.

Only available for FY2025 HOPWA awards and later!



ADMINISTRATION:

Up to 7% of your utilized award

Eligible Expenses:

- Office supplies and postage
- Rent and utilities of office space
- Costs associated with attending HOPWA-related trainings approved by HUD
- Staff time spent creating and submitting reports, compiling claims, etc.

Cannot be used for employee bonuses or costs directly associated with other eligible HOPWA activities.



Source: <u>24 CFR 574.300(b)(10)</u>





HOPWA CLAIMS PROCESS:

Subrecipients submit claims via IHCDA Online

If you need access to IHCDA Online, contact IHCDA Claims: claims@ihcda.in.gov.

Claim submissions due on the 20th day of each month

- Claim submission for June 2026 expenses is due on July 20, 2026
- If Project Sponsor misses deadline, late claims approval is required.
- Late claims approval is granted on a case-by-case basis, in extenuating circumstances.

Required components of a claim submission:

- Updated award budget
- Access to IHCDA Online
- Completed claims narrative form (updated form is on IHCDA HOPWA webpage)
- Client IDs from HMIS (if claiming expenses directly associated with a client)
- Supporting documentation as highlighted on next slide



HOPWA CLAIMS PROCESS:

Supporting Documentation in claim submissions include:

- Documentation showing proof of payment, with PII redacted
- Timesheets for any staff time claimed; mileage reimbursement reports for any staff mileage claimed
- Emails from CS Grants Team
 - Required if late claim approval was received <u>OR</u> are otherwise instructed to add an email to your claim submission

Project Sponsors and IHCDA Staff may reference the new "HOPWA Claims Supporting Documentation Chart" for clarity on supporting documentation requirements.



CLAIMING STAFF TIME:

Provide all the following in your HOPWA Claim:

- Name of corresponding staff member(s)
- Activity(ies) Conducted
- Amount of time spent on the activity
- Amount(s) Incurred per activity(s)
- Corresponding funding associated with the activity

Not Sufficient:

- Amount of time spent on HOPWA without activity breakdown
- Providing activity breakdown <u>without</u> providing amount of time spent on HOPWA activities
- Not specifying the staff member involved

Recommendation: Review your procedures or system and make updates as needed.



ADDITIONAL NOTES ON CLAIMS PROCESS:

All Project Sponsors will receive an email granting blanket approval to back-claim expenses from July 1, 2025

- This email must be in each back-dated claim submission!
- Failure to attach this email will result in your claim being denied.
- That email will include a deadline to which back-claiming can occur. Contact Niloofar or Jim if questions or issues arise.

One month of expenses = one claim submission

• 12-month contract = 12 total claims maximum

Start with earliest month you intend to claim for, then move to the next chronological month

• If you skip a month, you will forfeit the right to claim for the month you skipped.

Updates to the claim submission process regarding the protection of PII have been implemented this year. See the updated Claims Narrative Form and HOPWA Claims Supporting Documentation Chart for more information.



BUDGET MODIFICATION AND AMENDMENTS:

Amend FY2025 Budget through new Budget Modification Form

- New form is on IHCDA's HOPWA webpage.
- To amend award budget from FY2024 and prior, please contact Niloofar.

No more than 3 budget modifications per award

- Be mindful of the 7% spending cap for the administration line-item.
- If circumstances arise in which more modifications are required, please contact Niloofar.

Be judicious in selecting when you do a modification

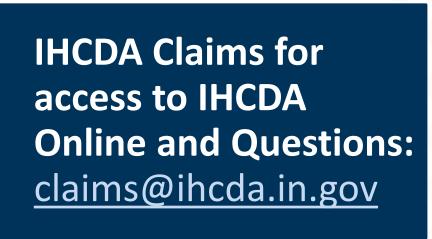
• If budget modification is needed, please submit ASAP to allow maximum time for processing.



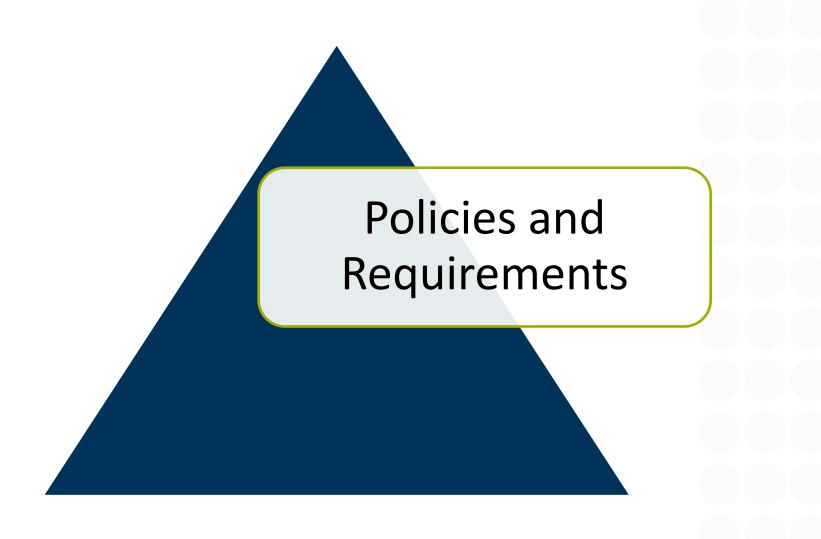
CLAIMS ERRORS ARE A CONCERN.
PLEASE BE CONSCIENTIOUS IN CHECKING
FOR ACCURACY AND ASK BEFORE YOU
SUBMIT IF THERE ARE QUESTIONS.



CLAIMS-RELATED CONTACT INFORMATION:









RENT STANDARD:

TBRA and PBRA are subject to HUD's FMR for each area **AND** Rent Reasonableness.

STRMU is not subject to FMR or rent reasonableness.



FMR AND RENT REASONABLENESS RESOURCES:

FMR Estimates: Fair Market Rents (40th PERCENTILE RENTS) | HUD USER

Rent Reasonableness Estimates: <u>AffordableHousing.com</u> - <u>Affordable Houses & Apartments For Rent</u>



FMR LIMITED EXCEPTION:

HOPWA uniquely allows 20% of units to receive assistance for up to 10% above FMR rates, per 24 CFR 574.320(a)(2)

- Grantee is required to track usage of this exception
- Project Sponsors who utilize the exception must complete the Limited Exception to FMR Tracker Sheet available on IHCDA's HOPWA webpage.
- Completed FMR Exception Tracker is due on September 30, 2026.



INTRO TO HMIS:

HMIS = Homelessness Management Information System

HUD's system used to enter client level data and generate reports for a variety of programs

- Secure, confidential Web-based data collection system that tracks data on the nature and extent of homelessness in your individual program(s), your community, and also statewide and nationally.
- User-friendly, customizable, easy to generate reports
- Case Management Tool: Can track employee hours, client goals, outcomes, and manage case loads
- Arizona Self-Sufficiency Matrix- built in vulnerability matrix to quantify clients' progress over time

IHCDA's HOPWA program requires the use of HMIS for data entry and analysis.



HMIS REQUIREMENTS AND EXPECTATIONS:

Ensure data timeliness

• Five business days within initial client intake, annual recertification, and exit

High data quality

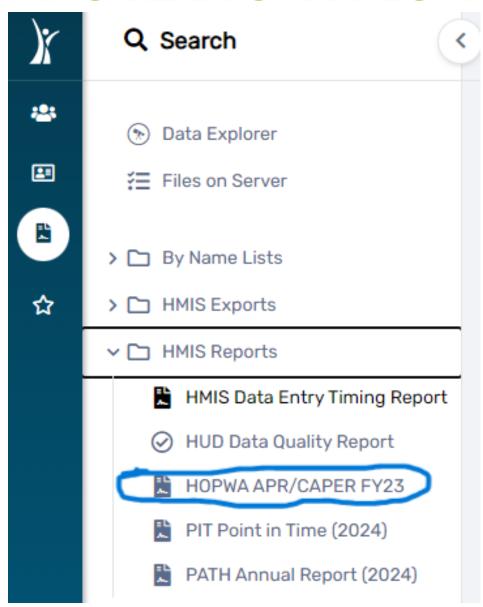
Ensure complete collection of data as much as possible

Participation in HIC/PIT if and when appropriate

- Homeless Inventory Count: Counts the number of beds and units dedicated to serving people experiencing homelessness
- **Point-In-Time Count:** Counts the number of people experiencing homelessness on a single night in January



HMIS TEAM UPDATES - APR:





HMIS TEAM UPDATES:

Resources on HMIS

- IHCDA Website: HMIS ClientTrack and DV ClientTrack
- Contact Information:
 - HMIS HelpDesk: <u>HMIShelpdesk@ihcda.in.gov</u>
 - DVClient Track HelpDesk:
 <u>DVHelpdesk@ichda.in.gov</u>



CONFIDENTIALITY:

Protect client-level PII in all facets of administering the HOPWA program.

• Main examples include claims process, intake/assessment, oral or written communication amongst staff, etc.

If information needs to be disclosed to a third-party for the purposes of administering services, signed consent between the client and the Project Sponsor needs to be on file.

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



CONFIDENTIALITY:

The following information is subject to HOPWA confidentiality requirements:

- First and Last Name
- HIV/AIDS Status
- Client eligibility documentation (i.e. medical documentation of HIV/AIDS diagnosis, proof of income, any CE assessments, referrals from Health Departments, etc.)
- Any data that alone, or in conjunction with other data, likely discloses a client's identity and/or location

Grantee and Project Sponsors are required to protect the PII of all clients and beneficiaries served.



CONFIDENTIALITY – DATA STORAGE:

Limit the number of staff with access to protected data.

- Keep hardcopy files in locked cabinets in locked rooms.
- Password protect electronic files. Tracking software can monitor who is accessing files and when.
- Issue keys to files only to those who need access to do their work.

Protect against accidental disclosures

- Do not leave confidential files sitting on desks or loose in drawers.
- Conduct private intake sessions where conversations cannot be overheard.
- Immediately deactivate access to electronic systems when employees leave the agency.

As technology changes over time, risk of outing client status may also change. Check letterhead and other materials for the following:

- Names of agencies Use "DBA" name of agency if you have one. Pursue getting a "DBA" if need be.
- Contact Information:
 - Phone numbers are Google-able; be mindful of that as you communicate with landlord and other stakeholders
 - Email addresses (non-descript domains)
 - Have a PO Box listed on forms



REQUIREMENTS - LEAD BASED PAINT:

Reminder: Ensure units comply with lead-based paint regulations during your inspections!

Provide "Protect Your Family from Lead in Your Home" booklet to all prospective families.

Lead-Based Paint Exemption Form is required for all units.

• Lead-Based Paint Disclosure Form and Lead-Based Paint Ongoing Agreement Form are only required in certain instances.



LEAD BASED PAINT EXCEPTIONS (NON-EXHAUSTIVE):

STRMU assistance continues for more than 100 consecutive days

Properties built after 1978

A zero-bedroom dwelling unit, including single occupancy dwelling unit

Housing for the elderly, or a residential property designated exclusively for persons with disabilities, **UNLESS** child less than age 6 resides or is expected to reside in the dwelling unit

Source: 24 CFR 35.115



RESOURCES ON LEAD-BASED PAINT REQUIREMENTS:

<u>US Department of Housing and Urban Development - HUD - Visual Assessment Training</u>

LSHR Toolkit: Introduction - HUD Exchange

Training completed by former IHCDA staff:

https://attendee.gotowebinar.com/recording/7569524463726316716

COMING SOON: Publication of "Lead-Based Paint Requirement Flowchart" on IHCDA's website.

• Release of this resource will be announced once finalized.



VIOLENCE AGAINST WOMEN ACT (VAWA)

Applies to these HOPWA activities:

- Tenant-based/project-based rental assistance
- New construction
- Operating costs
- Community residences
- Acquisition, rehabilitation, conversion, lease, and repair of facilities

Regarding STRMU:

 No individual may be denied assistance, have their assistance terminated, or be removed on the basis or as a direct result of the fact that the individual is or has been a victim of one of the four types of VAWA abuse/violence.





Client Forms/Documentation:

- Housing Application and Assessment
- Confirmation of HIV status or AIDS diagnosis
- Rent and Income Calculation Form
- Documented Medical Insurance
- Program Service Agreement
- Housing Plan/Individual Case Management Service Plan
- HOPWA Permission to Release Confidential Information to Secure Necessary Services (Release of Information)
- Documentation for any grievances filed or terminations of assistance



Housing Documentation:

- Smoke Detector Certification
- Carbon Monoxide Alarm or Detector Certification
- Housing Quality Standards (HQS), signed and dated before lease is signed
- 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)
- Copies of cleared checks



Lead-Based Paint Documentation:

- Confirm Receipt of "Protect Your Family in the Home" Lead-Based Paint Brochure
- Lead Based Paint Exception Form
- Lead-Based Paint Disclosure Form*
- Lead-Based Paint Ongoing Agreement Form**

*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.

^{**}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.



VAWA Documentation:

- VAWA Lease Addendum: https://www.in.gov/ihcda/files/VAWA-Lease-Addendum.docx
- Confirm Receipt of Form HUD-5380 Notice of Occupancy Rights Under VAWA: <u>HUD-5380</u> AND Form HUD-5381 - Model Emergency Transfer Plan: <u>HUD-5381</u>
- Form 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation*: HUD-5382
- Form 5383 Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking*: <u>HUD-5383</u>



^{*}Only required if applicable to the client's circumstances.

RECORD RETENTION REQUIREMENTS:

Per regulation (24 CFR 574.530a and c) client level records should be maintained for four (4) years.

- Current and accurate data on the race and ethnicity of program participants
- Data on emergency transfers requested under 24 CFR 5.2005(e) pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

Per 24 CFR 574.450, Grantees and Project Sponsors are required to maintain financial records to ensure proper accounting and disbursing of amounts received from HOPWA funds.



REQUIREMENTS - PROGRAM INCOME

Needs to be reported in December and June; needs to be spent before closing out award

Program income is going to be reported in a separate form that our team will ask you to complete.

Please let us know if you have questions about program income.

Program income also will be reported on Annual HOPWA CAPER.



REQUIREMENTS – CLOSEOUT PROCESS:

Project Sponsors utilizing the FMR Limited Exception must complete the FMR Exception Tracker Sheet on IHCDA's HOPWA webpage.

Project Sponsors must complete the IHCDA HOPWA Annual Closeout form, which includes narrative-based questions.

Both Grantee and Project Sponsors must complete the HOPWA CAPER.

Per HUD Requirements, Grantee submits all CAPERs on behalf of Project Sponsors.

• If corrections are requested, corrections must be completed. Questions can be sent to our team.



COMPLIANCE AND MONITORING:

Purpose: To help subrecipients maintain and improve their administration of HOPWA assistance.

25% of programs are monitored each program year, as required by IHCDA's signed agreement with HUD

1st time awardees must be monitored during the grant year.



COMPLIANCE AND MONITORING:

The Compliance Monitors will send an email notifying you that a monitoring is taking place.

They may ask to schedule a call and/or request additional documentation.

Be mindful of deadlines to get documentation submitted to Compliance Monitors. Emphasis on compliance with federal requirements such as:

Client file review for case management and required documentation

Financial review including match reporting and claims

Utilization of Coordinated Entry and HMIS



COMPLIANCE AND MONITORING:

Eventually, Subrecipients will receive a report detailing **concerns** or **findings**. Project Sponsors are then responsible for addressing them until they are cleared.

Please note that if you don't resolve findings in a timely manner, you may be unable to submit claims.



TIPS TO ENSURE AWARD COMPLIANCE:

Refine current or create new workflows to help you efficiently enter and update data within 5 calendar days of intake or recertification.

Track staff time across components to ensure you track by award component/activity and not just to HOPWA broadly.

Stay up-to-date on VAWA requirements and interweave any required forms into your work with clients.

Ensure confidentiality of PII while administering HOPWA assistance.

Meet your deadlines to submit claims and requested documents/reports!

Communication – when in doubt, ask IHCDA Staff!



UPDATES FROM IHCDA



CONTACT INFORMATION

- Community Services Team Email: communityservices@ihcda.in.gov
- Community Services Formula Grants Team:
 - Niloofar Asgari, CS Grants Analyst, <u>nasgari@ihcda.in.gov</u>
 - Jim Flatford, Formula Grants Manager, <u>iflatflord@ihcda.in.gov</u>
- Coordinated Entry:
 - Jesse Vanhooser, CoC Engagement Manager, <u>ivanhooser@ihcda.in.gov</u>
- HMIS HelpDesk: <u>HMIShelpdesk@ihcda.in.gov</u>
- DVClient Track HelpDesk: <u>DVHelpdesk@ihcda.in.gov</u>
- IHCDA Online & General Claims Questions: <u>claims@ihcda.in.gov</u>



QUESTIONS?

