



Housing Opportunities for Persons with AIDS (HOPWA) Grant Program

*Providing housing and
supportive services to
individuals living with HIV/
AIDS and their families.*

Program Manual

Grant Year 2025-26

State of Wisconsin

Department of Administration

**Division of Energy, Housing and
Community Resources**

Provides program rules and
guidance for the HOPWA Grant
Program

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The Wisconsin Department of Administration (DOA) Division of Energy, Housing and Community Resources (DEHCR) may update this program manual periodically to reflect new policies or requirements. Project Sponsors will be notified of major changes but are responsible for using the most current version of the manual. DEHCR reserves the right to revise program guidance at any time to ensure compliance with HUD regulations and notices. Users of this manual should always verify that they are referring to the latest guidance. In case of any conflict between this manual and the written agreement with DEHCR, federal regulations or HUD guidance, the written agreement or federal requirements will prevail.

Contents

Chapter 1: General Information.....	5
1) Introduction	5
2) Program Authorization.....	5
Chapter 2: Program Overview	6
1) Objectives.....	6
2) Features	6
3) Eligible Activities	7
4) Performance Period	7
Chapter 3: HOPWA Administration in Wisconsin	8
1) Grantee and Project Sponsor Structure.....	8
2) Eligible Applicants for Project Sponsorship	8
3) Geographic Service Area	8
4) Project Sponsor Responsibilities	8
5) DEHCR Oversight and Monitoring.....	9
6) Continuum of Care Coordination.....	10
7) Grant Agreement and Amendments	10
Chapter 4: General Program Requirements	10
1) Fair Housing and Non-Discrimination	10
2) Confidentiality and Privacy	11
3) Housing Quality and Safety Standards (Inspections).....	12
Chapter 5: Client Eligibility.....	14
1) General Eligibility Requirements.....	14
2) Housing Status Requirement	15
3) Eligibility Exceptions.....	15
4) Verification and Documentation.....	15
5) Application and Intake Process.....	16
6) Waiting List Policy	16
Chapter 6: Short-Term Rent, Mortgage, and Utility (STRMU) Assistance	16
1) Overview of STRMU	17
2) 21-Week Limit (Timing Rules)	17
3) Eligible Uses of STRMU	17

4) Client Contribution.....	18
5) Housing Status and Need.....	18
6) Eligible Types of Housing	19
7) Inspections for STRMU.....	20
8) Lead-based paint in STRMU	20
9) STRMU Service Delivery, Step-by-Step	20
10) STRMU and Other Assistance	22
11) Recordkeeping for STRMU	22
12) Performance Considerations	22
Chapter 7: Tenant-Based Rental Assistance (TBRA)	23
1) Purpose and Overview of TBRA	23
2) Tenant Choice and Portability.....	23
3) TBRA Eligibility	23
4) Time Limits.....	24
5) Basic Structure of TBRA Assistance.....	24
6) Calculating the Household's Rent Payment.....	24
7) Calculating the HOPWA Subsidy (Maximum Rental Assistance)	25
8) Fair Market Rent Standard.....	25
9) 110% FMR Exception (10% Rule)	25
10) Gross Rent Calculation	26
11) Shared Housing Arrangements	26
12) Steps for Providing TBRA	26
13) Ongoing Assistance and Monitoring.....	29
14) Annual Recertification.....	29
15) Issues/ Violations	30
16) Move-outs.....	30
17) End of Assistance	30
18) Records.....	30
19) Lease Requirements.....	30
20) Landlord Program Agreement	31
21) TBRA Client File Requirements	31
Chapter 8: Permanent Housing Placement (PHP).....	32
1) Eligible Costs	32

2) Restrictions	32
3) Record Keeping for PHP	32
Chapter 9: Supportive Services	32
4) Scope of Supportive Services	33
5) Access to Supportive Services.....	34
6) Coordination with Other Programs.....	34
7) Housing Counseling Certification Requirement.....	35
8) Recordkeeping for Supportive Services	35
9) Limits on Use of Funds for Services	35
10) Supplanting Health Services Policy	35
11) Outcome Measures.....	36
12) Client Rights	36
Chapter 10: Housing Information Services	36
1) What Housing Information Services Include.....	37
2) Access and Delivery.....	37
3) Tracking and Impact.....	38
4) Funding Considerations	38
5) Links to Other Programs	38
6) Quality and Training.....	39
7) Outreach	39
Chapter 11: Grievance and Termination of Assistance.....	39
1) Grievance Policy.....	39
2) Termination of Assistance.....	40
3) Due Process Requirements	41
4) Assistance After Termination.....	41
5) Surviving Family Members (Post-Death of Client).....	42
6) Documenting Terminations	42
7) Eviction vs. Termination.....	42
8) Grievance and Termination Training	43
9) Progressive Discipline	43
10) Confidentiality in Grievances	43
Chapter 12: Data Collection and Reporting Requirements	43
1) Homeless Management Information System (HMIS)	43

2) Monthly and Quarterly Reporting	44
3) Annual Progress Report (APR/ CAPER)	45
4) Other Reports and Recordkeeping	45
Chapter 13: Financial Management.....	45
1) Budgeting and Use of Funds	45
2) Financial Management Systems	46
3) Payment and Reimbursement Process	47
4) Drawing Funds in IDIS	Error! Bookmark not defined.
5) Cash Management	47
6) Tracking of Client Assistance Funds	47
7) Financial Reporting	47
8) Budget Revisions	47
9) Financial Monitoring and Audits	48
10) Property and Equipment Damage	48
11) Program Income.....	48
12) Financial Management Training	49
13) Record Retention	49
14) Audit Trail.....	49

Chapter 1: General Information

1) Introduction

The Wisconsin Housing Opportunities for Persons with AIDS (HOPWA) Program provides housing assistance and related supportive services to low-income persons living with HIV/AIDS and their families. The goal of the program is to help participants establish or maintain stable housing that is decent, safe, and sanitary, reduce their risk of homelessness, and improve their access to health care and supportive services. This manual is a comprehensive resource for administering the HOPWA program in Wisconsin. It outlines program rules, eligibility criteria, eligible activities, and administrative requirements in accordance with federal regulations ([24 CFR Part 574](#)) and current U.S. Department of Housing and Urban Development (HUD) guidance. HOPWA grantees (referred to as Project Sponsors (PS)) are required to follow all policies and procedures in this manual, as well as all applicable state and federal rules. In addition, HUD regularly publishes information for project sponsors on the [HOPWA: Housing Opportunities for Persons with AIDS – HUD Exchange](#).

2) Program Authorization

The HOPWA program was established by the AIDS Housing Opportunity Act, as amended by the Housing and Community Development Act of 1992. HUD's Office of HIV/AIDS Housing manages HOPWA at the

federal level. Since the program's inception in 1992, HOPWA has assisted thousands of households nationally to prevent homelessness among persons living with HIV/AIDS. Funds are appropriated by Congress and allocated by formula to eligible states and metropolitan areas. The State of Wisconsin receives a formula HOPWA grant from HUD each year and is the grantee responsible for administering the program statewide (except in areas covered by separate metropolitan grants, as described below).

Chapter 2: Program Overview

1) Objectives

The HOPWA program was created to provide housing assistance and supportive services for persons living with HIV/AIDS who have low incomes. The program is designed to help this population achieve housing stability, thereby improving health outcomes and reducing the risks of homelessness. HOPWA funds can be used for a wide range of housing interventions – from short-term emergency housing assistance to long-term rental subsidies – as well as supportive services that help households maintain housing. All HOPWA assistance must benefit an eligible person with HIV/AIDS and their immediate family or household members.

HOPWA assistance is targeted at those most in need and unable to obtain adequate housing through other means. The amount of housing assistance provided to each household is determined by factors such as the household's income and housing costs, to ensure that those with the lowest income and highest need receive the most help. In practice, this means households contribute a portion of their income toward rent and HOPWA pays the balance up to allowable limits.

2) Features

Key features of the HOPWA program include:

- **Housing Focus:** Funds are primarily directed toward housing assistance. This can include tenant-based rental assistance (TBRA), short-term rent, mortgage, and utility (STRMU) payments to prevent homelessness, and housing placement assistance. The type and duration of assistance can vary based on client needs – from emergency short-term aid to ongoing rental support.
- **Supportive Services:** In addition to housing, HOPWA can fund supportive services such as case management, referrals, life skills, employment support, and other services that help program participants address challenges related to health and housing stability. Supportive services may be provided on their own or in conjunction with housing assistance.
- **Housing Stability Goals:** The ultimate goal is to help clients achieve and maintain stable housing. For some, HOPWA may serve as a bridge until they can secure longer-term housing assistance (for example, a Housing Choice Voucher or other permanent housing). Others may need ongoing support through HOPWA or may reside in HOPWA-supported units. All activities are aimed at reducing the risk of homelessness and improving access to care for persons with HIV/AIDS.
- **Collaboration:** HOPWA programs are required to coordinate with local homelessness services systems (Continuums of Care), Ryan White HIV/AIDS programs, and other housing and health programs to ensure clients receive comprehensive assistance. HOPWA funds are intended to fill gaps and meet needs not met by other public or private sources. Project Sponsors should leverage mainstream resources whenever possible and use HOPWA as the payor of last resort for eligible housing needs.

3) Eligible Activities

HUD regulations define the eligible activities that can be funded under HOPWA ([24 CFR §574.300](#)). Eligible activities are grouped into two broad categories: direct housing assistance to clients and associated costs to develop or maintain housing units or provide services. Below is an overview of HOPWA eligible activities that can be funded under Wisconsin's HOPWA program (all of which will be described in detail in later chapters of this manual):

Housing Assistance for Clients:

- **Short-Term Rent, Mortgage, and Utility (STRMU) Assistance:** Time-limited, emergency financial assistance to cover rent, mortgage, and utility costs to prevent homelessness (see [Chapter 6](#)).
- **Tenant-Based Rental Assistance (TBRA):** Ongoing rental subsidies that allow a client to rent housing in the private market. The assistance is tied to the client and can move with them to new units within the service area (see [Chapter 7](#)).
- **Permanent Housing Placement (PHP):** Financial assistance to help clients secure permanent housing, such as payment of security deposits, first month's rent, utility connection fees, and related one-time costs (see [Chapter 8](#)).
- **Housing Information Services:** Activities that provide information, referrals, and housing search assistance for persons with HIV/AIDS. This may include counseling on housing opportunities, tenant education, and outreach to potential landlords (see [Chapter 10](#)).
- **Supportive Services:** A range of supportive services for HOPWA-eligible households, such as case management, mental health services, substance abuse treatment, transportation, nutritional services, and other help to improve housing stability and health outcomes (see [Chapter 9](#)).

Administrative and Other Costs:

- **Resource Identification:** Efforts to establish, coordinate, and develop housing assistance resources for HIV/AIDS housing (for example, staff time to locate available housing units or develop partnerships).
- **Administrative Costs:** General management, oversight, and coordination costs of the program. By statute, no more than 7% of the grant can be used for administrative costs by each Project Sponsor. (Administrative costs are discussed in [Chapter 13](#).)

4) Performance Period

Wisconsin's HOPWA formula grant operates on an annual cycle. Typically, funds are awarded for a program year running from October 1 through September 30 of the following year, subject to federal funding levels and award timing. Grants may be renewed annually based on performance and funding availability. For example, the Grant Year 2025 award will cover the period October 1, 2025 – September 30, 2026, subject to renewal for one additional year based on the project sponsor's performance. Project Sponsors are expected to meet performance outcomes (such as maintaining stable housing for clients) and comply with all program requirements to remain eligible for continued funding.

Chapter 3: HOPWA Administration in Wisconsin

1) Grantee and Project Sponsor Structure

The formula grantee for the State of Wisconsin's HOPWA program is the Wisconsin Department of Administration (DOA), specifically the Division of Energy, Housing, and Community Resources (DEHCR). As the grantee, DEHCR receives HOPWA funds from HUD, and is responsible for ensuring that the program is administered in compliance with federal requirements. Rather than operating the program directly, DEHCR awards HOPWA funds to a Project Sponsor through a competitive application process. Each year, an application is posted on the DEHCR website inviting eligible organizations to apply to serve as the HOPWA Project Sponsor for the state. Applicants can submit for all or part of the full award amount. Applicants are not required to serve the entire 66-county HOPWA service area (described below) unless they apply for the full award amount. DEHCR reserves the right to determine the grant amount, activities, and budget with the selected applicant(s) prior to executing any grant agreement.

2) Eligible Applicants for Project Sponsorship

Eligible applicant organizations include cities or counties, housing authorities, tribal entities, and private nonprofit agencies located in Wisconsin. Private nonprofits must meet the following qualifications:

- Be organized under Wisconsin Statute Chapter 181 (or equivalent for nonprofits).
- Have 501(c)(3) federal tax-exempt status.
- Be governed by a voluntary board of directors.
- Use an approved accounting system and practices.
- Adhere to nondiscrimination requirements in service provision.
- Have a track record of good standing with state and federal programs (e.g. no unresolved audit findings, no outstanding reports due, not debarred from federal funding, etc.).

All applicants must be registered in the federal System for Award Management (SAM) and not be listed as debarred or suspended from federal programs. DEHCR may also require that the Project Sponsor participate in the local HUD-recognized Continuum of Care (CoC) for homeless services covering their proposed service area (coordination with CoC is encouraged as a program requirement).

3) Geographic Service Area

Wisconsin's HOPWA formula grant covers all areas of the state except the six counties that are part of other HOPWA formula jurisdictions. The six counties not covered are Milwaukee, Ozaukee, Washington, Waukesha (which fall under the Milwaukee metropolitan HOPWA grant), and Pierce and St. Croix (which are included in the Minneapolis/St. Paul area HOPWA grant). The remaining 66 counties in Wisconsin comprise the state HOPWA service area for which DEHCR is responsible.

4) Project Sponsor Responsibilities

The organization(s) selected as Project Sponsor(s) enters into a grant agreement with DEHCR and is responsible for the day-to-day operation of the HOPWA program. Key responsibilities of a Project Sponsor include: client outreach and intake, determining client eligibility, providing or coordinating housing assistance and supportive services, ensuring housing units meet quality standards, financial management of the grant funds, reporting performance data, and overall program compliance.

A Project Sponsor may deliver services directly and/or sub-contract with other local agencies to cover certain regions or specialized services. Any subrecipients must be approved by DEHCR, and the primary Project Sponsor remains accountable for all program outcomes and compliance. When there is a Subrecipient, the Project Sponsors must have written agreements with the Subrecipient(s). Written agreements between Project Sponsors and any Subrecipients must outline terms for spending HUD HOPWA funds, specify activities that will be undertaken and describe how performance will be measured. The agreement must explicitly outline project goals and the scope of work. In addition, Project Sponsors must help ensure that communication received from DEHCR is relayed to Subrecipients.

Up to 7% of the HOPWA grant award may be used by the Project Sponsor for administrative costs; the remaining 93% or more must be used for direct program services (housing assistance and supportive services) . Project Sponsors are prohibited from charging any fees to HOPWA program participants for housing or services provided (HOPWA assistance must be free of charge to clients, aside from rent contributions determined by the program).

Throughout the grant, a Project Sponsor must manage funds in accordance with federal financial standards. This includes maintaining records of expenditures by activity category (e.g. separating spending on STRMU vs. TBRA vs. supportive services, etc.) and not exceeding budgeted amounts without prior approval. A Project Sponsor should also leverage other funding whenever possible. HOPWA is often one part of a larger network of support for clients, and sponsors are encouraged to help clients access mainstream housing subsidies (like Section 8 Housing Choice Vouchers) or other benefits to maximize the reach of HOPWA funds.

5) DEHCR Oversight and Monitoring

DEHCR (as the state grantee) retains ultimate responsibility for ensuring program compliance and effectiveness. Per [24 CFR 574.500](#), DEHCR is responsible for helping ensure that Project Sponsors carry out activities in compliance with all applicable requirements. HUD will enforce pursuant to [2 CFR 200](#). DEHCR will monitor the Project Sponsor's performance and adherence to requirements in several ways:

- **Grant Management:** DEHCR staff will review the Project Sponsor's monthly reports, reimbursement requests, and other submissions for accuracy and completeness. Any issues or delays (such as late reports) may prompt technical assistance or sanctions (like payment delays) if not resolved.
- **On-site or Remote Monitoring:** DEHCR may conduct periodic monitoring reviews. This can include on-site visits to the Project Sponsor's office or remote desk reviews of documentation. During monitoring, DEHCR will examine program and financial records, review client files for required documentation, inspect evidence of housing quality inspections, and assess overall compliance with regulations and the grant agreement. The Project Sponsor is required to cooperate and provide access to all relevant records. Following a monitoring review, DEHCR will provide a written monitoring report or letter noting any findings (violations of requirements) or concerns, and the Project Sponsor will be expected to respond and correct any deficiencies.
- **Technical Assistance and Communication:** DEHCR will maintain communication with the Project Sponsor through a designated Grant Specialist. Regular check-ins, training, and updates will be part of program oversight. DEHCR highly encourages the Project Sponsor to utilize HUD's online

resources and training tools (such as the HOPWA Financial Management Training and the HOPWA Oversight Resource Guide) to ensure sound management practices.

Ultimately, DEHCR is accountable to HUD for how funds are spent and for achieving HUD's national performance measures (such as the percentage of households who achieve stable housing). Therefore, DEHCR will enforce all rules with the Project Sponsor(s) and provide guidance as needed to maintain a high-performing program. Regular performance evaluation will occur, and any serious or unresolved compliance issues could affect the Project Sponsor's future funding.

6) Continuum of Care Coordination

DEHCR and the Project Sponsor are encouraged to coordinate with the Balance of State Continuum of Care (CoC) and any local CoCs in the Project Sponsor's service area. Coordination may involve participating in CoC meetings, sharing data for the community's planning efforts, and ensuring HOPWA is represented in strategies to address homelessness. While HOPWA serves a specific population, many clients may also be part of the broader homeless services system, so alignment with CoC resources (like use of Homeless Management Information System (HMIS), participation in coordinated entry systems, etc.) is encouraged. (Note: Participation in HMIS is a requirement – see [Chapter 12](#).)

7) Grant Agreement and Amendments

Once selected, the Project Sponsor will sign a grant agreement with DEHCR that binds them to the approved activities and budget. If changes are needed during the grant year (for example, shifting funds between budget categories, or adding a new subcontractor, or adjusting targets), the Project Sponsor must request a grant agreement amendment from DEHCR. DEHCR will provide guidance on what is allowable and will approve or deny amendments in writing. Project Sponsors cannot unilaterally reallocate HOPWA funds or change program scope without approval.

Chapter 4: General Program Requirements

This chapter outlines general requirements and cross-cutting federal rules that apply to the HOPWA program.

1) Fair Housing and Non-Discrimination

HOPWA-funded programs must be implemented in compliance with all federal, state, and local non-discrimination and fair housing laws. This includes (but is not limited to) the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Age Discrimination Act, and HUD's Equal Access Rule. No person can be denied HOPWA services or housing based on race, color, religion, sex, national origin, disability, familial status, sexual orientation, gender identity, or marital status. In addition, Wisconsin law may provide further protected classes (such as ancestry, lawful source of income, etc.) which the Project Sponsor must honor in providing assistance. The Project Sponsor must adhere to all the following requirements in implementing the program:

- **Fair Housing Practices:** The Project Sponsor should affirmatively further fair housing in its HOPWA program. This means assisting clients in overcoming barriers to housing choice and ensuring housing opportunities are made available without discrimination. All housing assisted with HOPWA funds must be made available on an equal opportunity basis. The Project Sponsor should include the Equal Housing Opportunity logo or statement on program materials and

landlord agreements and ensure that staff are trained on fair housing rights and referral procedures if a client experiences housing discrimination.

- **Reasonable Accommodations and Modifications:** The Project Sponsor must have policies to address reasonable accommodation requests from persons with disabilities. Clients with disabilities may request changes in rules, policies, or how services are provided to have equal access to the program. For example, a client with a hearing impairment may request a sign language interpreter for appointments, or a client with a mobility impairment may need help locating a wheelchair-accessible unit. Such requests must be considered and granted whenever reasonable. In housing, landlords must similarly comply with reasonable accommodation requirements (such as allowing a service animal in a “no pets” building). If HOPWA funds assist a housing facility, that facility must be accessible or provide accommodations per Section 504 requirements. The Project Sponsor should assist clients in requesting accommodations or modifications (physical changes to units) and ensure program accessibility in all services (e.g., providing documents in alternate formats for visually impaired clients, etc.).
- **Violence Against Women Act (VAWA):** Although HOPWA is not a HUD-covered program under VAWA by statute, HUD strongly encourages comparable protections. The Project Sponsor should ensure that program policies do not penalize victims of domestic violence, dating violence, sexual assault, or stalking. For example, if a client is a victim of domestic violence, that fact cannot be used as a reason to terminate assistance or evict them if they otherwise are complying with program requirements. The Project Sponsor should refer victims to appropriate services and may adopt policies like VAWA protections (such as bifurcating a lease to remove an abuser, honoring VAWA emergency transfer plans, etc.). Client information regarding domestic violence must be kept confidential and only used as needed to provide assistance or referrals.

2) Confidentiality and Privacy

Given the sensitive nature of HIV/AIDS status, maintaining client confidentiality is of paramount importance in HOPWA programs. Personally Identifiable Information (PII) is data that can be used to identify a specific individual, either on its own or when combined with other information. Project Sponsors are expected to comply with terms and conditions established by HUD regulations in [24 CFR 574.520](#) for monitoring, evaluation and record keeping by DEHCR and HUD. Project Sponsors must have written PII confidentiality policies and procedures in place. These policies should ensure that information about a person’s HIV status or services is protected from improper disclosure. Specific expectations include:

- **HIV Status Privacy:** Information that identifies a person as having HIV/AIDS (or as a program participant) must be kept confidential. This includes names, medical information, case details, and any documents containing personal health information. Staff should not disclose a client’s HIV status to landlords, family members, other clients, or anyone without the client’s explicit written consent. Even within the agency, only staff who need to know for service provision should have access to a client’s files.
- **Data Protection:** Physical client files should be stored in a secure, locked location. Electronic records (including HMIS data) must be password-protected and accessible only to authorized personnel. When reporting data to DEHCR or HUD, Project Sponsors should use aggregated or de-identified data whenever possible. PII should not be sent via unsecured email or left visible in shared spaces.

- **Consent for Release of Information:** If information about a client needs to be shared (for example, coordinating with a healthcare provider or referring to another service), the Project Sponsor must obtain a specific, signed release of information from the client that authorizes what information can be shared and with whom. General or “blanket” release forms are not acceptable – releases must specify the party/agency and the scope of information. Clients have the right to refuse to consent to information sharing, and this refusal cannot affect their eligibility for HOPWA. The Project Sponsor should explain what information is needed and why, to help the client make an informed choice.
Communication and Records: All communications and records must be handled to avoid inadvertent disclosure. For example, written correspondence (letters, envelopes) to clients or landlords should not explicitly indicate an HIV-related program. Checks or payment vouchers to landlords or utility companies should not reference HOPWA or HIV in a way that breaks confidentiality. Staff should be careful when calling clients or leaving messages – do not reveal sensitive info unless speaking directly to the client or a designated representative.
- **Staff Training:** All program staff (and any volunteers handling client info) should be trained on confidentiality requirements and the agency’s PII, HIPAA or privacy policies. This training should cover proper handling of records, consequences of breaches, and procedures for reporting any breach. Staff should sign acknowledgments of understanding confidentiality rules.

3) Housing Quality and Safety Standards (Inspections)

All housing units or facilities assisted with HOPWA funds must be safe, decent, and sanitary. HUD requires that certain housing quality standards be met, and units must be inspected to ensure they meet minimum criteria. HOPWA follows either HUD’s Housing Quality Standards (HQS) or local habitability standards for inspections, and these remain the primary requirements for Wisconsin’s HOPWA program.

Current Inspection Requirement: Wisconsin’s HOPWA program uses the HOPWA Habitability Standards (comparable to basic HQS) for unit inspections. Before a HOPWA rental assistance subsidy begins for a unit — or before a housing facility is approved — the Project Sponsor must inspect the housing to verify that it is in acceptable condition. This includes evaluating building structure, plumbing, electrical, heating/cooling, fire safety (including smoke detectors), and checking for lead-based paint hazards (addressed separately below). Inspections should be documented on a standard form and kept in the client file. Units must also be inspected at least annually to ensure ongoing compliance.

Exceptions for Existing Units: Units that already meet the applicable HQS or HOPWA Habitability Standards do not need to meet stricter standards if the client remains in the same unit. HUD guidance allows that if a unit passed inspection at the time the client moved in, the client should not be required to relocate as long as the unit continues to pass re-inspections under the original standard. Project Sponsors must keep documentation of the original inspection and continued annual re-inspections in the client file.

Exception for STRMU: An initial full HQS inspection is not required before STRMU assistance is provided. However, the Project Sponsor must visually verify that the unit is safe and habitable in an emergency sense — specifically, that it has no immediately life-threatening conditions and includes a working smoke detector and carbon monoxide detector. This visual check can be performed quickly (even virtually or via photo) so assistance can begin. If STRMU extends beyond a short-term period, a more thorough habitability inspection is recommended.

Smoke and CO Alarms: As of December 27, 2022, federal law requires that carbon monoxide (CO) alarms or detectors be installed in all HOPWA-assisted housing units, consistent with the 2018 International Fire Code. As of December 29, 2024, smoke alarms must also be installed in all HOPWA-assisted units, meeting the standards of the International Code Council or National Fire Protection Association (NFPA-72). Before providing any HOPWA assistance (including STRMU), Project Sponsors must verify the presence of functional smoke and CO alarms and document this verification. If alarms are missing, sponsors must arrange for immediate installation, which is an allowable use of HOPWA funds.

Ongoing Property Standards: Project Sponsors must ensure that assisted housing remains in good condition:

- For TBRA units, annual re-inspections are required. If a unit fails inspection due to deficiencies, the landlord must be given notice to correct the issues. HOPWA funds should not continue to pay for substandard housing. If deficiencies are not corrected in a reasonable time, the unit or tenancy may need to be terminated, and the client relocated to a safe unit.

Lead-Based Paint Safety: Lead-based paint poisoning is a serious concern in housing built before 1978, especially for young children and pregnant women. HOPWA housing activities are subject to the federal Lead Safe Housing Rule ([24 CFR Part 35](#), as referenced by [24 CFR §574.635](#)). The Project Sponsor must comply with lead-based paint requirements intended to prevent lead poisoning. Grantees are encouraged to complete an [online training course](#) prior to performing lead-based paint inspections.

When Lead Rules Apply: Not all HOPWA-assisted housing will trigger lead requirements. The key factors are the age of the housing (built before 1978) and whether the assisted household includes a child under age 6 or a pregnant woman. Specifically:

- If HOPWA assistance is short-term and under 100 consecutive days (e.g. short-term emergency hotel stay or STRMU assistance that does not exceed 100 days), lead requirements can be waived. HUD defines 100 days as a threshold: assistance longer than that is considered “long-term” and triggers lead rules.
- If the unit was constructed in 1978 or later, there is no lead-based paint concern, so requirements do not apply.
- If the household has no members under age 6 and no pregnant women, the lead requirements do not apply (because the risk group is not present).
- If the unit is a 0-bedroom or SRO unit (such as efficiencies or studio apartments), certain lead requirements (like risk assessment) are not required because children are unlikely to reside there.

However, if all the following conditions are met: (1) housing built before 1978, (2) assistance longer than 100 days, and (3) a pregnant woman or a child under 6 will live in the unit, then lead-safe housing rules apply. In such cases, before assistance is provided:

- The Project Sponsor must perform a visual assessment of the unit to check for any deteriorated paint (peeling, chipping paint on walls, windows, doors, or other surfaces). Staff should be trained in HUD’s visual assessment procedure (free online training is available).

- The sponsor must provide the household with the EPA/HUD pamphlet “Protect Your Family from Lead in Your Home” (or the most current lead hazard information brochure) and obtain a signed acknowledgment that the tenant received it. Also, the landlord must provide any required Lead Disclosure forms (federal law requires landlords of pre-1978 housing to disclose known lead paint and reports).
- If deteriorated paint is found, paint stabilization (safe repair of the peeling areas) must be conducted following lead-safe work practices, and the unit must pass a clearance examination by a certified professional to ensure no hazardous lead dust remains. HOPWA funds can be used for the costs of repair and clearance testing if necessary.
- The Project Sponsor should document compliance with these steps in the file (visual inspection results, receipt of pamphlet, disclosure forms, any clearance test results).

During ongoing assistance, ongoing lead maintenance is required: the owner should periodically check for new paint deterioration and address it promptly. If a child under 6 in the unit is ever identified with an elevated blood lead level (EBLL) (defined by the CDC/HUD – currently 3.5 µg/dL or higher as of the latest guidance), the Project Sponsor must take additional steps. These include notifying the local public health department and ensuring a risk assessment is done in the unit to identify lead sources, then completing lead hazard reduction (interim controls or abatement) and clearance testing. The family must also be referred for medical attention. These steps should follow the procedures [in 24 CFR Part 35 subparts B, J, K, or R](#) as applicable.

If none of these triggers apply (for example, STRMU for 60 days, or a single adult household, or a 1990-built apartment), the Project Sponsor should document the exemption in the file (e.g. “Unit built in 1980 – exempt from lead requirements” or “No child or pregnant woman in household – lead rule not applicable”). This ensures clarity in monitoring.

Chapter 5: Client Eligibility

1) General Eligibility Requirements

To receive HOPWA-funded assistance (other than housing information services), a household must meet two basic criteria:

1. **HIV/AIDS Diagnosis:** At least one member of the household must be medically diagnosed with HIV or AIDS. Documentation of the person’s status is required (such as a doctor’s certification, HIV verification form, or other verifiable medical documentation). This individual is considered the “eligible person” for HOPWA. Their family members (as defined by HUD to include those living with or in care of the person) are also eligible to receive assistance as part of the household.
2. **Income Eligibility:** The household must be low-income, defined as having income at or below 80% of the Area Median Income (AMI) for the HOPWA service area, as established annually by HUD. Income limits (80% AMI) vary by household size and county and are published by HUD and republished by WHEDA for Wisconsin and allowable under [24 CFR 574.320\(a\)\(2\)](#). The Project Sponsor must use the current HUD Section 8 income limit charts (as provided by WHEDA) for the applicable county/MSA to determine eligibility. Verification of all sources of income is

required (e.g., pay stubs, benefit letters), and income is calculated following Section 8 guidelines ([24 CFR Part 5](#) definitions of income).

Both criteria must be met at the time of program enrollment. Thereafter, the income must be recertified annually for those receiving ongoing assistance (like TBRA) to ensure they remain below 80% AMI. If a household's income rises above 80% at recertification, they would no longer qualify for continued HOPWA assistance.

2) Housing Status Requirement

HOPWA does not require that an individual be homeless to receive assistance. They may be currently housed but at risk of homelessness (e.g. behind on rent), or homeless, or fleeing domestic violence, etc. However, for STRMU assistance, the household must currently have housing (renting or owning their home) that they are at risk of losing – since STRMU is specifically to help someone remain in their existing housing (see [Chapter 6](#)). HOPWA can also assist persons who are literally homeless, primarily through TBRA or by placing them into housing (sometimes with PHP funds for deposits). Each client's housing situation at entry (homeless or housed) should be documented per reporting requirements, but there is no blanket requirement to be homeless.

3) Eligibility Exceptions

There are two notable eligibility exceptions:

- 1) **Housing Information Services** (such as housing counseling, search assistance, referral) may be provided to any individual with HIV/AIDS, regardless of income level. In other words, a person who is HIV-positive can receive information and referral services under HOPWA even if their income exceeds 80% AMI. This exception exists because providing information has a negligible cost and is seen as a broadly beneficial activity. For tracking, the sponsor should still record basic information, but these individuals would not count as “assisted households” in the same way as those receiving financial assistance. No financial assistance (like rent help) can be given to over-income clients, but basic housing counseling is allowed. Apart from this, all other forms of direct assistance require meeting the low-income threshold.
- 2) **Surviving Family Members.** If the HOPWA-eligible person (with HIV/AIDS) passes away while the household is receiving assistance, the remaining family members (who may or may not have HIV) are allowed to continue receiving housing assistance for a transition period (up to one year) as described in [Chapter 11](#). During that transition period, the household is still considered eligible for assistance even though the original qualifying member is deceased. After the transition, assistance ends unless another member is HIV-positive and low-income, in which case that person could potentially qualify the household moving forward.

4) Verification and Documentation

The Project Sponsor must collect documentation to prove eligibility:

- **For HIV status:** acceptable documentation could be a form or letter signed by a physician, clinic, or health care professional attesting that the individual has HIV/AIDS; or a benefits statement showing eligibility for an HIV/AIDS-specific program (like AIDS Drug Assistance Program); or other confidential medical documentation. *It is not required to collect actual lab results or detailed medical records – a simple certification of status is sufficient.* This information must be

kept confidential (see [Chapter 4](#) on confidentiality) and only used to establish program eligibility.

- **For Income:** all sources of income for all adult household members should be documented (e.g. wages, SSI/SSDI, Social Security, unemployment, TANF, pensions, etc.). The Project Sponsor will calculate the household's gross annual income. If the household is over-income, they cannot be enrolled (except for housing information only). If under the limit, they qualify. A file checklist should be used to ensure all necessary verification documents are obtained. The income calculation and the applicable income limit should be clearly recorded in the file.
- **Housing stability plan:** While not a strict "eligibility" requirement, it is expected that each HOPWA household receiving on-going assistance will participate in developing a housing and services plan to work toward greater self-sufficiency (see [STRMU](#) and [TBRA](#) chapters for more information). The presence of a housing plan is monitored as a program requirement, but a client is not denied eligibility for refusing services beyond housing. They can, however, be terminated if they violate program requirements such as refusing to recertify income, or refusing inspections, etc. (see [Chapter 11](#) on termination policies).

5) Application and Intake Process

The Project Sponsor should have a standardized application or intake form for HOPWA. When a person inquires or is referred, basic pre-screening can be done (for example, asking if they have an HIV diagnosis and fall under the income limit). If they appear to qualify, a full application is completed, and supporting documents are collected. The date of application may be used to establish priority in any waiting list (if demand exceeds capacity). The Project Sponsor must also ensure the applicant is informed of their rights (e.g., confidentiality, fair housing) and consents to data collection (especially entry into HMIS – usually an HMIS release form is signed).

If an applicant is found ineligible, the Project Sponsor should provide a written notice of denial explaining the reason (e.g., income is too high, no HIV diagnosis documentation, etc.) and, if possible, refer them to other resources. Ineligible applicants have the right to appeal the decision through the grievance process ([Chapter 11](#)) if they believe it was made in error.

6) Waiting List Policy

If the HOPWA program cannot serve all eligible applicants immediately (for example, TBRA slots or funding are full), the Project Sponsor should maintain a waiting list. The waiting list policy should be fair and documented – i.e. first-come, first-served, or by level of need if using a prioritization. Applicants should be informed of their placement on the list and updated if the list opens/closes. The Project Sponsor may coordinate with the local Coordinated Entry system for homelessness if appropriate.

Chapter 6: Short-Term Rent, Mortgage, and Utility (STRMU) Assistance

Short-Term Rent, Mortgage, and Utility (STRMU) assistance is a HOPWA activity that provides temporary, emergency housing cost help to households experiencing a financial crisis. The purpose of STRMU is to prevent homelessness of an eligible person by helping them stay in their current housing during a short-term period of need. This chapter describes how STRMU works, including eligibility, limits, and procedures.

1) Overview of STRMU

STRMU can pay past-due or current rent, mortgage, and/or utility bills for a household. It is used when a household is at risk of losing their housing due to an inability to pay these costs, often because of unexpected financial hardship or health issues. By covering these housing expenses for a short duration, STRMU gives the household time to recover stability (for example, to get back to work, access benefits, or make a plan for longer-term housing). STRMU is not an ongoing subsidy; it is time-limited emergency aid. HOPWA regulations impose a cap on the length of time STRMU can assist a household: no more than 21 weeks of assistance in any 52-week period. This effectively means STRMU can cover up to a cumulative 5 months of costs in a year, whether consecutive or spread out.

2) 21-Week Limit (Timing Rules)

The 21 weeks (also stated as 147 days) are counted in a specific way:

- The “52-week period” begins on the first day that STRMU assistance is provided for the household. For example, if the first assistance paid was for a utility bill covering July 1–July 31 (and paid on, say, August 5), the 52-week clock starts July 1. From that date, the household has 52 weeks (until next year June 30) in which they can receive up to 21 weeks of help.
- Each day that is covered by HOPWA assistance counts toward the limit, but only the portion of costs covered by HOPWA counts. If STRMU pays a full month’s rent, that is 30 days counted. If STRMU pays half the month’s rent, HUD allows prorating the days counted. For instance, paying 100% of August rent (covering Aug 1–31) uses 31 days of the 147 allowed. If only 75% of the August rent is paid by HOPWA (client paid the rest), then 75% of 31 days = ~23 days count. The same goes for utilities: if an electric bill for 30 days is paid 50% by HOPWA, that’s 15 days counted.
- If rent and utility assistance overlap in time, HUD allows counting them together as one period if the overlap is at least 14 days. Essentially, you consider the combined period covered. For example, STRMU pays part of August rent and part of a utility bill that covers mid-August to mid-September – since there is overlap in August for at least 14 days, you combine them as covering August (31 days). Then calculate proportion: if total HOPWA paid \$100 of combined \$150 of those bills, that’s ~67% of August covered, equating to 21 days counted.
- The Project Sponsor should carefully track the number of days (or weeks) of assistance each household uses. After 21 weeks of HOPWA assistance in a year, the household is no longer eligible for additional STRMU until that 52-week period ends. The household should be informed when they are nearing the limit so they can plan accordingly.

3) Eligible Uses of STRMU

STRMU funds may be used to pay:

- **Rent for the household’s primary residence (this could be monthly rent to a landlord, lot rent for a mobile home, etc.).** It can include standard fees that are part of the rent. It cannot pay late fees unless those fees must be paid to avoid eviction – HUD guidance allows late fees or court costs to be paid if necessary to keep the person housed. Otherwise, if not critical, HOPWA typically doesn’t cover late fees.
- **Mortgage payments for the household’s primary residence.** This includes principal and interest and could include escrowed property taxes or insurance if part of the payment. It does not include making up escrow shortages not tied to a current payment, and it cannot pay mortgage

late fees except in situations similar to above (i.e. if foreclosure is imminent without paying them, possibly).

- **Utility payments, including electricity, gas, water, sewer, trash removal, heating fuel, etc., for the residence.** Utilities also encompass connection or reconnection fees if needed.
- **STRMU can cover arrears (past due amounts) for any of the above, as long as the household still has an opportunity to stay in the housing by clearing those arrears.** For example, paying 3 months of back rent to prevent eviction is allowed (counting those months toward the limit), or paying an overdue utility bill to restore service.
- Moving costs or other expenses are **not** covered by STRMU. (PHP covers move-in costs separately, see [Chapter 8](#).)

There is no dollar cap on how much assistance a household can receive through STRMU, other than practical program budget limits and the time limitation. DEHCR does not impose a specific financial cap per household. This means if a household has a very high rent for one month and needs it, STRMU could pay it as long as it's within the 21-week window and funds are available. However, HOPWA funds are limited, and the Project Sponsor should ensure equity in distribution. If needed, DEHCR could approve a cap or require the sponsor to prioritize within available funds.

4) Client Contribution

STRMU does not require the client to pay a portion of the cost. If the client has some ability to pay, they are encouraged to contribute, but STRMU can cover up to 100% of the housing cost during the assisted period. It is good practice not to cover amounts the client can manage – e.g., if the client can pay \$100 of their \$600 rent, and HOPWA covers \$500, that stretches resources and also counts fewer days (because partial payment prorating). Project Sponsors should assess each household's financial situation (often through a budget counseling session) to determine if the client can pay a portion. Any portion the client pays must indeed be paid – the sponsor should verify that the landlord or utility received the client's share, to avoid eviction due to a shortfall. This also protects the client from accumulating more debt.

STRMU assistance can be provided for consecutive months or intermittently. For example, a household might need help three months in a row during unemployment, or they might just need one month, then later in the year another month if a different crisis hits, as long as the total doesn't exceed 21 weeks.

5) Housing Status and Need

To qualify for STRMU, the household must be in housing that they currently lease or own (cannot be literally homeless or doubled up such that they have no rental obligation). They must demonstrate an urgent need:

- Typically, an overdue rent notice, eviction notice, foreclosure notice, or utility shutoff notice is present (or at least a documented inability to pay the upcoming rent).
- The Project Sponsor should gather evidence of the crisis, such as the notices mentioned, and evidence that paying this assistance will prevent homelessness (for instance, a statement from the landlord that eviction proceedings will stop if paid, or that the landlord will accept payment and not evict).
- The Project Sponsor conducts a Housing Stability Plan with the household (called an Individual Housing and Services Plan or IHSP). This is a plan outlining how the household will maintain

housing after STRMU ends. It often includes connecting to other benefits (such as Ryan White assistance, employment services, longer-term subsidies, etc.), addressing the cause of crisis, and steps like reducing expenses or increasing income. The plan should have specific goals and be developed jointly with the client. While not a condition to get STRMU (DEHCR doesn't recommend withholding emergency help pending plan completion), it is expected that during the period of assistance, the project sponsor is actively working with the client on this plan to prevent future crises.

6) Eligible Types of Housing

STRMU can assist with a variety of housing arrangements:

- **Renter households:** in private market apartments or houses, mobile homes (lot rent or home rent), manufactured housing, etc.
- **Homeowners:** paying mortgage on a house, condo fees if they are part of the housing cost, etc.
- **Subsidized housing:** If a household lives in subsidized housing (like they have a Housing Choice Voucher or reside in public housing), HOPWA STRMU cannot pay the subsidized portion (which is already covered by HUD), but it could potentially pay the tenant's owed portion if they fall behind and face eviction. However, double subsidy rules caution against paying ongoing rental portions if that subsidized program has its own protections. Generally, HOPWA can pay arrears for a subsidized tenant if needed to prevent eviction, but not ongoing rent if it's already reduced. Also, if a subsidized tenant is evicted for something other than non-payment (like violations), STRMU might not help since paying rent won't resolve that.
- **Transitional facilities or group homes:** Usually those have their own funding – STRMU is primarily for independent housing. If someone is in transitional housing and has a fee, that typically wouldn't be a mortgage or standard lease, so STRMU might not apply.

The sponsor should confirm the housing is legally eligible. meaning HOPWA funds can be used there. HOPWA cannot pay for housing costs that are already fully covered by another program (e.g., cannot pay rent for someone in a HUD Section 202 unit where rent is already adjusted to 30% of income and no risk of eviction for non-payment because subsidy covers it. The Project Sponsor should have the client sign a statement or otherwise verify that there is no other resource paying these costs.

As part of eligibility verification for STRMU, the Project Sponsor will document:

- **Proof that the person is on the lease or mortgage or utility account.** (e.g., lease agreement, mortgage statement, utility bill in their name). If the client is not the leaseholder (maybe doubled up informally), they technically wouldn't qualify because STRMU is to keep someone in their own housing. However, if an HIV-positive client lives with family and the lease is in a family member's name, and that family faces eviction, the Project Sponsor should consult DEHCR – sometimes if it's the client's household, it can be interpreted broadly. Typically, though, at least one member of the assisted household should have a legal responsibility to pay the rent/mortgage.
- **For mortgage assistance:** confirm that the mortgage is the client's primary residence and that it isn't covered by, for example, a business loan or a mortgage for a business or second property.
- **For utilities:** ensure it's for the residence they live in (not, say, a utility bill for a business or second property).

- **Legal residency of unit:** e.g. not an illegal sublet or property that is condemned.

7) Inspections for STRMU

As noted under general requirements, no full HQS inspection is initially required for STRMU, but the Project Sponsor must visually ensure the unit has no glaring safety issues, in particular that smoke and CO detectors are present and working. The file should note that on such date, staff verified detectors and basic habitability. If serious habitability problems are evident (e.g., major roof leaks, no heat, severe infestations), the Project Sponsor should include in the housing plan a strategy to address those – possibly working with the landlord to fix them or moving the client when possible. The intent is not to withhold emergency help due to conditions, but to ensure the client isn't left in unsafe housing indefinitely. In extreme cases, STRMU might not be appropriate if the housing is truly uninhabitable; relocating the client might be safer, possibly using PHP and other resources.

8) Lead-based paint in STRMU

HUD guidance is that if STRMU is likely to continue beyond 100 days for a family with a child or pregnant woman in pre-1978 housing, do a visual lead inspection and follow lead steps at day 100 at the latest. If STRMU is not likely to continue beyond 100 days, and/or if there are no children or pregnant women in pre-1978 housing, visual inspection for lead is not required. Project Sponsors are encouraged to complete an [online training course](#) prior to performing lead-based paint inspections.

9) STRMU Service Delivery, Step-by-Step

The Project Sponsor should have a clear process for STRMU requests. A suggested workflow is:

1. **Initial Triage:** Client (or referring agency) contacts HOPWA sponsor indicating they are behind on rent/mortgage/utilities or facing eviction/foreclosure. Sponsor pre-screens for HOPWA eligibility (HIV+ and income) and basic situation.
2. **Application and Documentation:** The client fills out an application for assistance or the case manager helps to gather the needed documents:
 - Proof of HIV status (if not already enrolled).
 - Proof of income (to confirm low-income).
 - Proof of residency and responsibility: lease agreement or mortgage statement, utility bill, etc., showing their name and address.
 - Evidence of need: e.g., eviction notice, late rent notice, shutoff notice, utility bill showing arrears, or a letter from the landlord that X amount is owed by Y date.
 - Budget assessment: The sponsor conducts a quick household budget review to see what led to the crisis and what the client's finances are. This helps in planning and in determining if the client can contribute anything. Documentation of this review (like a budget worksheet) is kept in file.
3. **Determine amount and days of assistance:** Case manager figures out how much is needed to resolve the crisis. Perhaps the landlord will accept payment of, say, two months of back rent to cancel an eviction. Or the utility needs \$300 to restore service. The case manager calculates if

that would fall under 21 weeks (e.g. two months = ~61 days). If multiple bills, determine overlap for counting days. Ensure it is within limits.

4. **Check housing eligibility:** Confirm the type of housing is one that HOPWA can assist (not duplicative of another subsidy, etc.). Document verification (maybe a form or checklist that worker signs).
5. **Visual habitability and safety check:** Verify smoke/CO alarms present, note any major issues. If any life-threatening issues are noted (like no heat in winter), address immediately or help relocate.
6. **Provide consumer education:** Give the client the lead paint pamphlet if needed (if they might exceed 100 days and other conditions apply). Have the client sign a receipt. Also discuss basic tenant rights, maybe refer to housing counseling if appropriate. If domestic violence is an issue behind the scenes of eviction, safety plan accordingly (and note VAWA protections).
7. **Assistance Agreement:** As a best practice, rather than a requirement, have the client sign a short-term assistance agreement which outlines what assistance will be provided and the client's responsibilities (like working on the housing plan, notifying if their situation changes, etc.).
8. **Payment processing:** The Project Sponsor pays the landlord or utility directly whenever possible. HUD's preference is direct payment to the landlord or service provider (not to the client) to ensure funds are used as intended. In nearly all cases for STRMU, payment will be issued directly to the third party (landlord, bank, utility company).
 - The sponsor obtains a W-9 from any new landlord or vendor to set them up for payment.
 - A check or electronic payment is sent for the approved amount. The sponsor should then get a receipt or confirmation (e.g., a landlord-provided receipt or a new utility bill showing zero balance) to file.
9. **Individual Housing and Services Plan (IHSP):** While the payment is being processed or shortly after, the case manager and client should work on the IHSP (housing stability plan). Key elements might include:
 - Addressing the cause of crisis (e.g., if unemployed, connect to job resources; if health issue, ensure linking to medical care/Ryan White services).
 - Exploring longer-term housing options (should the client apply for Section 8, or move to cheaper housing, or move in with family, etc., to avoid another crisis?).
 - Budget counseling (identify where to cut costs or how to increase income).
 - Schedule follow-ups (maybe weekly check-ins during the assistance period).
 - If the client will still owe rent after our help, how will they manage it? If they have zero income, maybe consider an emergency SSI application or temporary shelter after STRMU ends if no improvement.

- The plan should be documented and signed by client and case manager.
 - The sponsor should maintain a list of any supportive services they provide to STRMU clients as well (for internal tracking or CAPER).
10. **During Assistance:** Monitor the household's progress. If multiple months of assistance are being provided, stay in contact with landlord—make sure rent is being paid on time for those months. If assistance is sequential, check each month if the plan is on track or if changes are needed.
11. **Closure or Transition:** When the household's 21 weeks are used or the crisis is resolved, the STRMU assistance ends. Do an exit assessment: did the household stabilize? Where are they exiting to (same unit stabilized, or to new housing, etc.) – record this. If the household still cannot maintain the housing at end of STRMU, the case manager should implement the backup plan (perhaps referring to a shelter or applying for TBRA if available, etc.). Exit data is entered in HMIS, including housing status at exit and reason for leaving.

10) STRMU and Other Assistance

A household can receive STRMU in the same year they receive other HOPWA assistance (like TBRA or PHP), but not for the same purpose. For instance, one could get STRMU early in the year to prevent eviction, and later that year secure a TBRA voucher for ongoing help. However, once TBRA starts, you cannot also use STRMU (since TBRA covers rent going forward).

11) Recordkeeping for STRMU

Each STRMU client file should contain:

- HOPWA intake (application, HIV status, income calc).
- Lease or mortgage and proof of arrears.
- Documentation of amount paid and for which period (copies of checks, ledger).
- Evidence of visual inspection for smoke/CO (and lead if applicable).
- Housing Plan and case notes.
- Budget worksheet and any referrals made (to job services, etc.).
- Signed releases or agreements (HMIS consent, grievance policy acknowledgement, etc.).
- The calculation of days of assistance used (could be on a form or case notes).
- Exit form or follow-up documentation.

12) Performance Considerations

STRMU success is measured by whether the household remains housed or is rehoused after the assistance. The Project Sponsor should aim to help as many STRMU clients as possible avoid homelessness. Tracking outcomes and possibly doing a follow-up call a few months after exit is valuable (and often required in reporting).

Chapter 7: Tenant-Based Rental Assistance (TBRA)

Tenant-Based Rental Assistance (TBRA) is a medium- to long-term housing subsidy provided to eligible HOPWA households, allowing them to live in rental housing of their choice in the community. Under TBRA, the rental assistance is tied to the tenant (household), not to a particular unit – so if the tenant moves to another suitable unit within the program’s service area, the assistance can move with them. This chapter describes TBRA program guidelines, including household contribution to rent, subsidy calculations, unit standards, and the process of administering TBRA. For more information, Project Sponsors are encouraged to refer to HUD’s [HOPWA Rental Assistance Guidebook](#) for information on program requirements.

1) Purpose and Overview of TBRA

The TBRA program aims to provide stable, affordable housing for persons living with HIV/AIDS and their families. It is targeted at households that need assistance for ongoing affordability. By paying a portion of the rent (and utilities) for a qualifying household, TBRA reduces the household’s housing cost burden, enabling them to maintain stable housing while managing their health and other needs. TBRA is intended to serve as a bridge to other permanent housing resources – households are highly encouraged to transition to Housing Choice Vouchers or other longer-term affordable housing options as those become available. In practice, a household may remain on HOPWA TBRA if they are eligible and funds are available, but the Project Sponsor should assist them in applying for mainstream vouchers or public housing, etc.

2) Tenant Choice and Portability

HOPWA TBRA allows the participant to find any rental unit in the private market that meets program requirements (rent cost and quality) and is within the 66-county service area. If a TBRA client wants to relocate to a different city or county within the state service area, they can take their TBRA assistance with them (after getting approval and ensuring the new unit meets requirements). The assistance cannot be used outside the Wisconsin HOPWA service area. For example, a TBRA client cannot use the subsidy to move to Milwaukee (which is outside the state’s HOPWA area) or to another state. If they choose to move outside the area, their HOPWA TBRA would terminate (Project Sponsors are encouraged to facilitate a transfer to another program, if possible). Within our area, portability is allowed, and the Project Sponsor should facilitate moves as needed (especially if clients need to move for safety or closer to medical care, etc.).

3) TBRA Eligibility

To receive TBRA, a household must meet the general HOPWA eligibility as discussed in [Chapter 5](#). There are no additional eligibility criteria specific to TBRA beyond that. However, the Project Sponsor should prioritize clients with greater need (e.g., those who are homeless or at serious risk, extremely low income, etc.). DEHCR expects the Project Sponsor to select TBRA participants in a fair manner, possibly using a waiting list or priority criteria if demand exceeds supply. All households must be willing to participate in the program requirements, which include complying with a lease, paying their portion of rent on time, permitting inspections, and engaging with the housing case management to the extent necessary to maintain stability.

4) Time Limits

There are not specific time limits imposed on how long a household can receive TBRA. A household can continue receiving TBRA as long as they remain eligible, the unit remains eligible, and program funding is available. Leases are typically one year, and assistance is provided in tandem with the lease term. The Project Sponsor must recertify the household's income and eligibility annually (usually at lease renewal) to confirm they still qualify. If the household remains eligible, they can be renewed for another year of TBRA.

Project Sponsors are encouraged to help households move off TBRA to more permanent subsidies when possible. If a household's income grows substantially (above 80% AMI) or if they become self-sufficient, they would "graduate" off the subsidy. Also, if their needs escalate (for instance, they require residential care), TBRA might end in favor of another arrangement.

5) Basic Structure of TBRA Assistance

TBRA uses a cost-sharing model between the program and the tenant:

- The household pays a portion of their income towards rent and utilities (this is called the resident rent payment).
- HOPWA pays the subsidy for the remaining amount of rent and utilities, up to certain caps (based on rent reasonableness and fair market rent standards).
- The tenant's payment generally should be the higher of 30% of adjusted income or 10% of gross income with the subsidy filling the gap up to the rent limit.

6) Calculating the Household's Rent Payment

Each TBRA household's contribution is the highest of the following three factors:

1. **30% of the household's monthly adjusted income.** Adjusted income means the household's gross income minus certain deductions (such as \$480 per dependent, certain childcare or disability assistance expenses, and medical expenses exceeding 3% of income for elderly/disabled family – these are the standard HUD deductions). The Project Sponsor should calculate adjusted income using HUD's formulas. For example, if a family's gross annual income is \$12,000, and after deductions the adjusted annual income is \$10,000, the monthly adjusted income is ~\$833, and 30% of that is \$250.
2. **10% of the household's monthly gross income.** Gross income is income before any taxes or deductions. In the example above, gross \$12,000/yr is \$1,000/mo., and 10% is \$100.
3. **The portion of any public assistance benefit that is designated for housing costs.** This is applicable if the household's only income is TANF or other welfare payments that have a specific housing allowance. In many modern welfare programs, there isn't a specific portion earmarked for housing, but if, say, a local General Assistance gave \$200 explicitly for housing, that \$200 would be considered. If none of the household assistance is explicitly for housing, this factor would be \$0 or not applicable.

The household's portion of the rent payment should be whichever of these three is greatest. In most cases, 30% of adjusted income is the highest figure, since adjusted income usually reduces gross and

10% of gross is usually smaller. The welfare-designated portion seldom comes into play unless the family's only income is a grant with a housing component.

Important: HOPWA cannot set a minimum rent – you cannot require a household to pay a fixed minimum amount if their income is extremely low. It must be based on their income. If a household has \$0 income, 30% of 0 and 10% of 0 are both 0, so they may pay \$0 for rent. (The sponsor should help them find income, but during that period, HOPWA could cover full rent.)

- The Project Sponsor should re-calculate the tenant payment any time the household's income changes significantly and at least annually. If income increases, the tenant's portion will increase; if income decreases, their portion decreases accordingly (assuming continuing eligibility). Households are required to report changes in income or family composition promptly because it affects their rent (and possibly eligibility). This is typically included in the client's participation agreement: they must notify the sponsor if, say, they start a new job or if a wage-earner leaves the household.

7) Calculating the HOPWA Subsidy (Maximum Rental Assistance)

Once the tenant's share is determined, the program calculates how much it can pay.

- The maximum HOPWA subsidy is determined by the formula:

Max HOPWA Rent Subsidy = (Lesser of Fair Market Rent or Reasonable Rent) - Tenant's Rent Payment.

- The program must ensure that the rent is within two limits:
 1. It must be Fair Market Rent (FMR) for that area and unit size or if it's over FMR, it might still qualify as an exception (explained below).
 2. It must be Rent Reasonable compared to similar unassisted units in the market (regardless of FMR).
- If the unit's gross rent (rent plus utilities) exceeds FMR and no exception is available, the subsidy is capped at FMR minus tenant payment, effectively, because HOPWA won't subsidize above FMR in general cases. If the unit's rent is below FMR, then reasonable rent becomes the likely cap (though typically if below FMR, it usually be reasonable too).

8) Fair Market Rent Standard

HUD annually publishes Fair Market Rents (FMRs) for each metropolitan area and rural county, by unit size (0BR, 1BR, 2BR, etc.), which include an estimate of utility costs. FMRs represent approximately the 40th percentile of standard units in the market. HOPWA TBRA must use the applicable HUD FMR as the rent standard. To determine compliance: add the contract rent plus the applicable utility allowance (excluding phone and cable). Utility allowances must be taken from the local public housing authority's current schedule. If gross rent (rent + allowance) is $\leq$ FMR for the bedroom size and area, the unit meets the FMR standard. Project Sponsors are encouraged to learn more about Fair Market Rents [here](#).

9) 110% FMR Exception (10% Rule)

HUD permits HOPWA grantees to approve a limited number of units above FMR. Up to 20% of TBRA-assisted units may have gross rents up to 110% of FMR.

- Exceptions must be applied on a case-by-case basis and documented.
- Project Sponsors must maintain a log of all exception units, the percentage of portfolio affected, and the justification for approval.

- DEHCR may require notification or approval of all exception units.
- Acceptable justifications include reasonable accommodation of a disability, proximity to medical care, or preventing disruption of housing stability.

10) Gross Rent Calculation

Gross rent = contract rent + utility allowance. Tenant contributions are based on income as defined under 24 CFR Part 5. The HOPWA subsidy equals gross rent minus the tenant's required contribution but cannot exceed the FMR (or approved 110% exception level).

- If gross rent > allowable standard, the household may pay the excess from its own funds. Programs should minimize such situations to avoid housing cost burdens.
- HOPWA subsidy may cover both rent and tenant-paid utilities, either by direct payment to the landlord, utility provider, or as a utility reimbursement.
- FMRs are updated annually (effective October 1). New FMRs must be applied at lease renewal or subsidy contract renewal. If FMR decreases and the unit is no longer compliant, the household may remain until the lease ends; at renewal, compliance with the new standard is required.

11) Shared Housing Arrangements

TBRA can be used in a shared housing situation (e.g., roommate situations) if the arrangement is lawful and intended to be permanent housing. In shared housing, HOPWA will only subsidize the portion of the housing cost attributable to the HOPWA-eligible household. The program uses a pro rata calculation based on the number of bedrooms or private space each household occupies:

- Determine the fraction of the unit that is for the HOPWA household's private use (bedrooms). If the household has 1 bedroom out of 3, that's 1/3 (33.3%).
- Apply that fraction to the total rent (and utility allowance) to get the share of housing cost for that household.
- Then apply the usual TBRA formula: the household pays 30% of their income etc., but only towards their share. HOPWA subsidizes the rest of their share.

The Project Sponsor should have the landlord separate leases or, if there is a joint lease, there should be an addendum or other written agreement in place. If a non-HOPWA roommate leaves the residence, the HOPWA household may need to cover the whole rent, find another roommate, or relocate to a different premises; the Project Sponsor should plan for these scenarios.

Shared housing calculations should be documented. The file should show how the pro rata share was determined (number of bedrooms or, if more applicable, square footage).

Example: A single HOPWA client rents a 2-bedroom apartment with a roommate. The apartment's total rent is \$1,200. The HOPWA client has one bedroom (50%), so their share of rent is \$600. If 30% of the HOPWA client's income is \$180, then their portion of rent is \$180, and the HOPWA-TBRA payment would be \$420. The roommate (non-HOPWA) is responsible for the other \$600.

12) Steps for Providing TBRA

Administering TBRA involves several phases – application, unit search and approval, lease-up, ongoing assistance, and eventual exit. Outlined below are a series of steps which constitute a suggested workflow:

- **Intake and Assessment:** When a client is selected or coming off the waiting list for TBRA, the case manager meets with them to verify eligibility (if not already done) and assess their housing needs and preferences. This includes discussing what kind of housing they are looking for, where, any accessibility needs, etc. The client should also be counseled on the responsibilities of being in the TBRA program and renting (paying portion on time, being a good tenant, etc.). A **Client Participation Agreement**, which outlines the clients responsibilities in TBRA, is required. This can include expectations to:
 - Provide true and complete information for eligibility and recertifications.
 - Work with case managers on supportive services (case management is typically offered but not mandatory in all cases).
 - Notify of changes in income or family composition promptly. Pay their rent portion on time to the landlord.
 - Allow inspections and maintain the unit in good condition.
 - Abide by program rules (like not engaging in illegal activity, etc.).
 - Follow rules in their lease and understand that if lease terminates, assistance terminates.
 - Understand grievance procedures and termination policies. The client signs this agreement and gets a copy for reference.
- **Housing Search:** The Project Sponsor should have a Housing Search Policy in writing that both staff and client follow. This policy helps guide what kind of unit the client can look for (e.g., unit size appropriate for household, rent limits, etc.). For example:
 - **Occupancy Standards:** Typically define what bedroom size a household qualifies for (e.g., one bedroom for single or couple, two bedrooms if with children of certain age/sex, etc.). HOPWA allows some flexibility, but it must be reasonable and not overcrowded or under-utilized to an extreme degree. The policy might say a one-person household can only get a 0 or 1-bedroom unit subsidy, etc.
 - **Rent and Utility Cap:** The policy will reiterate that rent plus utilities must be under FMR (or within exception range) and reasonable. The sponsor should provide the client or their housing counselor with the current FMRs and an estimate of what utility allowance might be for different unit types, so they know the price range.
 - **Geographic Area:** Units must be within the state service area (not out-of-area). Possibly the Project Sponsor might set some distance restrictions if they manage via certain regions within the state service area, but generally anywhere in the 66 counties is allowed. They may encourage staying in areas with available support services.
 - **Housing Quality Expectations:** The policy might include a basic habitability checklist to help the client avoid pursuing units that obviously won't pass inspection. For example, advising them to avoid units with severe issues or missing detectors, etc.
 - **Search Time Limit:** The client may have a certain number of days (like 60 days) to find a unit. The policy might say an initial search allowance of e.g. 60 days, with extensions possible if needed. This prevents open-ended commitments and ensures turnover if someone cannot find a unit.
 - **Signatures:** The housing search policy should be signed by both staff and client and kept in file. This ensures both parties understand the parameters and timeline.
- **Unit Selection and Approval:** Once the client finds a prospective unit, the process is:

- The client applies to the landlord and, if accepted pending subsidy, they inform the Project Sponsor. The Project Sponsor should pre-screen the unit to ensure it meets the basic criteria (size, cost).
- The lease is not signed yet at this stage. First, the Project Sponsor reviews the lease terms to ensure they are acceptable (no prohibited lease clauses – more on that below – and at least one year term unless there is an exception). The Project Sponsor also calculates the tenant's portion and subsidy for that specific unit's rent and confirms the unit's rent is within FMR and rent reasonableness limits. This should be communicated to the tenant and landlord.
- The Project Sponsor conducts a **Unit Inspection**. This includes:
 - **Habitability/HQS Inspection:** Checking that the unit meets all safety and quality standards using HQS checklist – check plumbing, electrical, egress, etc. It must pass before moving in.
 - **Lead-Based Paint inspection:** if pre-1978 and child/pregnant in household, ensure visual assessment or proper clearance, etc., as per lead rules.
 - **Smoke/Carbon Monoxide Detectors:** must be present and working, per law (the inspection will cover that).
 - **Documentation:** The inspection findings are documented. If the unit passes, great; if it fails, the landlord can be given a chance to make repairs. Common small fail items: missing smoke alarms, minor leaks, electrical outlet covers missing, etc. The Project Sponsor should re-inspect after fixes. If the unit cannot pass or landlord won't fix, the unit must be rejected for TBRA, and the client looks for another. The unit must fully pass inspection before any subsidy is paid and before the client moves in.
- **Rent Reasonableness certification:** The Project Sponsor completes the analysis as described earlier for that unit and keeps it in file.
- **Rent Negotiation:** If the rent is slightly above what's allowed or seems unreasonable, the Project Sponsor can negotiate with the landlord to lower it.
- If everything checks out (rent, inspection, client portion), then the Project Sponsor gives the **go-ahead**.
- **The Rental Assistance Contract between the Project Sponsor and the Landlord is executed.** This contract spells out the terms of HOPWA paying part of the rent. It will include conditions such as the landlord's responsibilities to maintain the unit in compliance with standards during the tenancy, the requirement to notify the sponsor of any issues (like non-payment, or if the tenant is violating lease), and how payments will be made. The contract also typically addresses what happens with the security deposit and that if the tenant moves or dies, subsidy stops, etc. (If using a template from HUD or state, it covers these.)
- **The Landlord fills out a W-9** (for tax purposes) if not already on file.
- The Tenant and Landlord **sign the Lease** (which should be a standard lease form that is used for unassisted tenants, with a term of at least one year, unless otherwise approved).
 - The lease ideally begins when the unit is ready and after the contract is signed.
 - **Important:** The lease should include the names of all occupants, the rent amount, term, etc., and must not include certain prohibited clauses (like confessing judgment, waving rights to court process, etc.).

- **Lease Review:** There are clauses that should not be in a lease (these are basically the standard HUD prohibitions: no making the tenant liable for legal costs regardless of outcome, no waiver of legal rights, etc.). The Project Sponsor should review the lease beforehand and, if any such clauses exist, have the landlord strike them or attach an amendment nullifying them. The lease should include:
 - The rent amount and who pays what (so likely an addendum that HOPWA will pay X and tenant pays Y).
 - Security deposit amount and who pays it. Utility responsibilities (landlord vs tenant). Maintenance responsibilities.
 - Prohibition of discrimination, etc.
 - Permissible grounds for termination by landlord (which should only be serious violations, as per normal landlord-tenant law).
 - A one-year term, renewable. (If a shorter lease is common market practice or beneficial, the sponsor can allow it case-by-case but must document why. Normally, aim for a year to give stability.)
- The Project Sponsor often has a **Lease Addendum** that gets attached, which includes the HOPWA program clauses (like the ones about prohibited lease terms, or that tenancy terminates upon assistance termination with certain grace maybe). The landlord and tenant sign that as part of lease package.
- **Security Deposit:** HOPWA TBRA funds cannot pay security deposits. However, security deposits are an eligible cost under Permanent Housing Placement (PHP) activities. If the Project Sponsor wants to assist with a security deposit or utility deposit, they should use PHP funds (see [Chapter 8](#)).

Once the contract and lease are signed, the Project Sponsor issues a move-in authorization to the tenant. The tenant can then move in on the lease effective date.

13) Ongoing Assistance and Monitoring

The Project Sponsor sets up payment systems to ensure the landlord is paid on time each month. The Project Sponsor will pay their portion directly to the landlord (e.g., by mailing a check or electronic transfer) each month. They must coordinate with their finance team to do this promptly.

The tenant pays their portion directly to the landlord. The sponsor should educate the tenant to do this consistently and on time. Many programs will check in if a landlord reports a late payment by tenant.

The Project Sponsor's staff should maintain communication with both tenant and landlord to handle issues. If repairs are needed, landlord does them; if tenant has difficulties (like can't pay utilities), they should inform the Project Sponsor to seek solutions.

14) Annual Recertification

At least 60-90 days before lease expiration, start re-evaluation:

- **Income Recertification:** Gather updated income docs and recalculate tenant portion for the coming year. If income changed, adjust the rent portion accordingly (with proper notice to tenant and landlord).
- **Inspection:** Perform an annual HQS inspection before renewing assistance (HUD requires at least annually). If the unit fails and cannot be fixed, the tenant may have to move.

- **Rent Reasonableness Update:** If landlord is raising rent, do another rent reasonableness check and ensure new gross rent still within FMR (or within exception if capacity).
- **Renewal Paperwork:** If continuing, either extend the existing contract/lease or sign a new lease for another year. Possibly a simple renewal letter if both parties agree to extend with same terms.
- **Adjustments:** If during the year, tenant income drops significantly (say they lose a job), they can report it. The Project Sponsor can interim recertify and reduce their rent portion (increasing subsidy) accordingly.

15) Issues/ Violations

If a tenant violates program rules or lease (e.g., not paying their part, causing serious disturbances, etc.), the Project Sponsor will follow the termination policy (see [Chapter 11](#)) to possibly terminate assistance if needed. But steps like warnings, working on corrective action, etc., come first. Similarly, if a landlord isn't fulfilling obligations (e.g., not fixing problems), the Project Sponsor might stop payments or move tenant after due process.

16) Move-outs

If a tenant wants or needs to move to another unit, they should inform the Project Sponsor. If it's within the service area, they may keep TBRA. The process essentially restarts: find a new unit, inspect, lease, etc. The sponsor should coordinate so there is a minimal overlap or gap. Ideally, the old lease is properly terminated (with notice) and the new lease starts the next month so there is no double rent. HOPWA cannot pay double rent for one household to hold two units.

17) End of Assistance

End of Assistance: TBRA ends when a household no longer meets eligibility (e.g., income above 80% or no HIV+ member; main scenario is if the sole HIV+ person dies and only family remains – see termination for survivor rights), or if funding ends or program closes, or if the client violates rules and is terminated. The sponsor should give proper notices in any case. If a client no longer needs assistance (income increased), a grace period of up to three months can be given, and then termination. If client secures a Section 8 voucher, they may overlap one month to transition but then HOPWA TBRA stops.

18) Records

Maintain thorough records including copies of leases, contracts, inspections, recertifications, correspondence, etc.

19) Lease Requirements

Based on HUD guidance, the following required elements must be in either the lease or addendum:

- At least one-year term (unless exception for shorter is documented).
- Renewal terms (likely automatically month-to-month after year or renegotiate). Names of all household members (to enforce no unauthorized occupants).
- Rent amount and what portion or that program will pay part (often they'll just list full rent, and separate payment contract details who pays what).
- Security deposit amount and who will pay it (if sponsor pays via PHP, could be noted). Which utilities/appliances landlord vs tenant is responsible for.
- Landlord's responsibility for maintenance.

- Conditions under which landlord can evict (should align with local law: mainly serious or repeated lease violations, violation of law, etc.) – basically no eviction without cause.
- Clause prohibiting landlord from evicting or refusing to renew except for those reasons (so not arbitrarily or for discriminatory reasons).
- Prohibition on illegal provisions as noted (no confession of judgment, no waiving legal notice, etc.). Many standard leases have some of these, so careful review is needed.
- Both parties' signatures and signing date.

20) Landlord Program Agreement

The HOPWA Landlord Contract that the Project Sponsor signs with the landlord often supplements the lease. It might include:

- Agreement to comply with HOPWA Housing Quality standards initially and throughout tenancy (landlord must keep the unit in good repair and allow annual inspections).
- Agreement to comply with landlord-tenant laws and Fair Housing laws.
- Procedures for conflict resolution (maybe they will involve Project Sponsor in communications about issues).
- Rules on security deposits: e.g., how deposit claims will be handled and if returned, that portion paid by program goes back to the program.
- If the tenant vacates, landlord must notify Project Sponsor immediately (especially if without notice). If the tenant is evicted through due process, notify Project Sponsor.
- Rent changes must be approved by sponsor.
- Landlord cannot charge extra fees to the tenant beyond lease (and if any minor fees, sponsor aware).
- Non-discrimination.
- Possibly a clause about termination of assistance does not affect lease. Often if assistance terminates, the family can't pay full rent, but legally the lease is separate. The Project Sponsor may have language along the lines of "in the event HOPWA stops paying, tenant may terminate lease with 30 days' notice" to protect tenant from being stuck.

Many of these are standard and ensure the landlord understands the program rules. The contract gives the Project Sponsor leverage to enforce standards beyond what a normal tenant could (like requiring repairs or withholding payment if not done, etc.).

21) TBRA Client File Requirements

The sponsor should maintain a well-organized file for each TBRA household. Typically, it is tabbed or divided into sections for:

- Application & eligibility (HIV verification, income calc, etc.).
- Housing search and selection (incl. housing plan, copy of housing search policy signed). Lease and contract documents.
- Rent calculation worksheets (initial and updates).
- Inspection reports (initial and annual).
- Correspondence (notices to tenant or landlord, complaints if any).

- Signed participation agreement, grievance policy, termination policy acknowledgments. Case management notes (contacts with tenant, referrals, etc.).
- HMIS printouts if any (though data is in HMIS, sometimes key data or reports are printed).
- Termination or exit paperwork when applicable.

HUD may monitor these to ensure compliance. DEHCR will also review during monitoring.

Chapter 8: Permanent Housing Placement (PHP)

Permanent Housing Placement (PHP) provides financial assistance necessary to help eligible households establish a residence in permanent housing. Assistance is intended to remove financial barriers, such as deposits or application fees, that prevent low-income persons living with HIV/AIDS and their families from securing stable housing.

1) Eligible Costs

Allowable PHP costs include:

- Application fees required for housing access
- First month's rent and security deposits (not to exceed two months)
- Utility connection fees and deposits
- Credit checks required for leasing
- Other necessary costs to secure permanent housing

2) Restrictions

- PHP may only be used for permanent housing, not temporary or transitional housing.
- Assistance cannot be applied to ongoing monthly rent or mortgage payments.
- Security deposits must not exceed two months' rent.

3) Record Keeping for PHP

- HOPWA intake (application, HIV status, income calc).
- Costs paid and confirmation that the assistance was necessary
- Lease agreements, receipts, or invoices verifying payments

Chapter 9: Supportive Services

Supportive Services are a critical component of the HOPWA program, designed to help program participants address challenges related to maintaining housing and improving their health and well-being. HOPWA funds may be used to provide an array of supportive services to eligible persons (and their families) as either a complement to housing assistance or, in some cases, as standalone assistance for those who may not need housing subsidy but do need services. The goal of supportive services in HOPWA is to ensure that households can achieve housing stability and access necessary care. Ongoing assessment of the housing assistance and supportive services is required by [24 CFR 574.500](#). All households must have a written plan to address their individual housing and service needs. The plan must include an assessment of their housing needs as well as the supportive services needed for them to become and remain stable in housing.

4) Scope of Supportive Services

According to [24 CFR §574.300\(b\)\(7\)](#), supportive services may include, but are not limited to:

- **Case Management:** Ongoing assessment, service planning, and coordination of services for the client. Case managers help clients navigate systems (medical, housing, benefits) and act as a primary point of contact. This can include developing individualized housing and care plans and monitoring progress.
- **Housing Counseling:** Assistance with understanding housing options, tenant rights, budgeting for housing, and resolving landlord/tenant issues. Note: If formal housing counseling (as defined by HUD) is provided, it must be delivered by HUD-certified housing counselors/organizations, unless it's incidental to case management. In practice, basic housing search help and tenancy support by case managers is fine; but if the sponsor runs a housing counseling program per [24 CFR 5.111](#), certification is required.
- **Life Skills Training:** Instruction in skills such as housekeeping, meal preparation, financial management, medication management, or other daily living activities that help individuals maintain independence.
- **Employment and Educational Services:** Job counseling, vocational training, assistance with employment searches, and coordination with workforce programs. Also includes GED classes, literacy training, or other educational support if relevant to housing stability (for example, increasing income).
- **Alcohol and Drug Abuse Treatment and Counseling:** If substance use is a barrier to housing stability, HOPWA can fund outpatient substance abuse counseling, peer support groups, etc. (Note: HOPWA cannot pay for in-patient medical detox or treatment as that crosses into medical services territory typically handled by other funding.)
- **Mental Health Services:** Counseling and therapy, support groups, peer counseling for mental health issues that affect housing or overall stability.
- **Access to Health Care/Medical Services:** While HOPWA funds generally should not supplant existing health care services (especially those covered by Ryan White or Medicaid), supportive services staff often assist clients in accessing HIV medical care, arranging transportation to appointments, medication adherence support, etc. HOPWA can fund things like health education, nutritional services (e.g., pantry food or meals), or medication management support that complement medical care.
- **Transportation:** Providing or paying for transportation so that clients can attend medical appointments, go to social service agencies, job interviews, or even grocery shopping if needed. This could be bus passes, van shuttle services, or mileage reimbursement.
- **Nutritional Services/Food Assistance:** This can include provision of meals, food bank referrals, or vouchers if food insecurity is an issue impacting health and housing. (Some HOPWA programs coordinate closely with food pantry services for PLWHA.)
- **Legal Support:** While HOPWA cannot pay legal fees for criminal defense or broad matters, it can support legal advocacy related to housing stability – for instance, legal assistance with housing discrimination, eviction defense, or estate planning (to ensure housing continuity for family). Often other sources cover legal aid, but coordination is key.
- **Child Care and Other Family Support:** If a lack of childcare would prevent someone from accessing medical care or maintaining a job (and thereby housing), HOPWA funds can be used to provide

short-term childcare assistance. Also, referrals to child services or family counseling may be part of supportive services.

- **Representational Payee or Financial Counseling:** Helping clients manage finances, especially those who have difficulty budgeting or paying bills. Sometimes case managers or trained volunteers may act as payees for clients' benefits to ensure rent and utilities are paid.

The above list is not exhaustive. Supportive services should be individually tailored to each household's needs, focusing on removing barriers to stable housing and encouraging self-sufficiency where possible.

5) Access to Supportive Services

The Project Sponsor should ensure that supportive services are made available to all HOPWA program participants who need them. Participation in services (like case management) is generally voluntary from a HUD standpoint – except that program rules can require basic engagement such as recertification meetings. However, clients should be strongly encouraged to make use of services as a tool for success. In practice, most HOPWA clients do work with case managers regularly. Services may be provided directly by the Project Sponsor's staff or through referrals and collaborations with other agencies (health departments, AIDS service organizations, etc.).

The Project Sponsor likely has at least one case manager position funded by the HOPWA grant to perform assessments, develop housing service plans, coordinate care, and track outcomes. This case manager may coordinate with Ryan White HIV case managers if the client has one, to avoid duplication and ensure holistic care.

6) Coordination with Other Programs

HOPWA supportive services funding is limited, and it should not duplicate or replace services available from other mainstream systems:

- **Ryan White HIV/AIDS Program:** Provides medical case management, insurance assistance, primary care, medications (ADAP), and support services like mental health and substance abuse counseling for eligible PLWHA. HOPWA Project Sponsors should coordinate with Ryan White providers so that clients get those services through Ryan White where possible (especially medical-centric services). HOPWA funds should focus on housing-related support and any gaps Ryan White doesn't cover. By federal law, HOPWA funds cannot be used to make payments for health services that are paid by other programs (no supplanting).
- **Behavioral Health Services:** If a client qualifies for state-funded mental health or substance use treatment (or through Medicaid), those should be tapped first. HOPWA could fund group support or specialized counseling if other sources are absent.
- **Social Services and Welfare:** Ensure clients enroll in any benefits they qualify for (SSI/SSDI, food stamps, TANF, utility assistance, etc.). Case management should include mainstream benefits linkage.
- **Employment Programs:** Connect clients to vocational rehab, job centers, or supportive employment initiatives as appropriate.
- **Other Housing Programs:** If HOPWA cannot provide assistance (for example due to capacity or ineligibility), case managers may refer them to emergency shelters, Section 8, public housing, or other housing services. Conversely, clients exiting HOPWA may be referred to general homeless prevention if needed in future.

7) Housing Counseling Certification Requirement

HUD regulations now require that if an agency is providing “housing counseling” (which HUD defines as assisting clients with a range of housing options and decisions in a formal way), that counseling must be delivered by a HUD-certified housing counselor and under a HUD-approved housing counseling agency.

In the HOPWA context, not all supportive services count as housing counseling. For example, helping a client fill out a housing application or discussing how to talk to a landlord is likely considered just housing search assistance (and part of case management). But if the Project Sponsor were to run formal housing counseling sessions (like classes on homeownership or managing credit specifically for housing) or advertise housing counseling services, then compliance with that rule is needed.

As a precaution, the Project Sponsor should review their supportive service activities to see if any fall under that definition and ensure staff certification if so. In general, to be safe, treat intensive housing search and rental readiness assistance as part of case management (exempt if incidental), rather than claiming it as “housing counseling program,” unless the Project Sponsor is indeed part of a housing counseling agency.

8) Recordkeeping for Supportive Services

For each client, the services provided should be documented in the client file or HMIS:

- **A Housing and Services Plan (IHSP)** is recommended for every household receiving supportive services. This plan lists the clients’ goals (e.g., obtain stable housing, maintain medication adherence, get employment) and outlines what services will be pursued to meet those goals. The plan is updated periodically with progress notes.
- **Service records:** case notes of contacts (date, what was done or discussed), referrals made (with outcomes if known), classes attended, etc.
- **Consent forms:** if referring or coordinating with doctors, other agencies, etc., have ROIs (releases of information) signed as needed to exchange information (keeping confidentiality rules in mind).

9) Limits on Use of Funds for Services

HOPWA law and regulations do not set a specific dollar cap on supportive services. However, the grant agreement or application might set spending limits or targets. The Project Sponsor must ensure that at least some housing assistance is provided – HOPWA is not intended to be used solely for services without housing assistance. In formula programs, HUD expects that a significant majority of funds go towards direct housing costs (TBRA, STRMU, PHP, facilities). Supportive services are often capped in practice by the program design or NOFA. For example, DEHCR might indicate that no more than XYZ% of the State of WI HOPWA program budget can go to supportive services if they want to maximize housing output. The Project Sponsor will follow any such guidelines from the state and their budget may be adjusted accordingly

10) Supplanting Health Services Policy

HOPWA regulation ([24 CFR 574.310\(a\)\(2\)](#)) state that funds cannot be used to “supplant other funding for health services that are available in the community.” Practically, if a client can get a medical service through a clinic or Ryan White, HOPWA should not pay for it. If HOPWA does fund any health-related service, it should be something not otherwise accessible and essential to housing stability (for example,

maybe paying a personal care aide for a client with AIDS who needs help to live independently, if no other program covers that – but likely other programs would, so careful analysis needed).

11) Outcome Measures

HUD tracks outcomes like:

- The number/percent of households that accessed support in the form of case management.
- How many people accessed medical care (CD4/viral load outcomes are tracked under HOPWA's CAPER some years).
- Housing stability outcomes often correlate with having supportive services in place. Additionally, DEHCR may have performance measures separate from the outcomes tracked by HUD.

12) Client Rights

Participation in supportive services (aside from basic program compliance meetings) is voluntary and cannot be required as a condition of receiving housing assistance beyond what is allowed (except for case management being offered but not forced). However, failure to engage at all might lead to issues in maintaining housing (e.g., if someone refuses to communicate and problems arise).

A delicate balance: you cannot, for instance, terminate someone's TBRA just because they did not attend counseling sessions. However, if their underlying issues cause lease violations, that could be grounds for termination via lease violation. The best approach is motivational – encourage and show the benefit of services.

Examples of integrated approach:

- A TBRA client falls behind on utility bills – supportive services might step in with budget counseling and link to energy assistance, preventing a crisis.
- A STRMU client lost their job due to illness – a case manager helps apply for SSI and connects them to a support group, as well as monitors their housing plan.
- Residents in a group home get daily living skills training and support with medication adherence, which improves their health, so they eventually move to more independent living.

Supportive Services in HOPWA are flexible and meant to respond to the diverse needs of clients. The Project Sponsor should design its supportive service component to effectively complement housing assistance:

- Ensure staff are properly trained (HIV knowledge, trauma-informed care, etc.). Collaborate with healthcare providers and other social services.
- Use a client-centered approach, empowering participants while providing needed assistance. Document outcomes and adjust services based on what's effective.

By doing so, supportive services will help clients not only obtain housing but also maintain it, improve their health outcomes, and lead more independent and fulfilling lives.

Chapter 10: Housing Information Services

Housing Information Services are one of the eligible HOPWA activities that focus on providing advice and assistance to individuals with HIV/AIDS in locating, obtaining, and navigating housing opportunities.

These services do not involve direct financial assistance, rather information and referral-type support. Importantly, as noted earlier, housing information services can be provided to people with HIV/AIDS regardless of income level (even above 80% of AMI), making it a broad-reaching tool for the program to serve the community.

1) What Housing Information Services Include

Housing Information Services are a flexible, low threshold offering that can extend the reach of the HOPWA program to serve more people and often can prevent a housing crisis by intervening early with guidance. They reflect HOPWA's intention not only to respond with financial aid but also to proactively equip persons living with HIV/AIDS with the knowledge and tools to find and keep suitable housing.

- **Housing Referral Assistance:** Helping clients identify available housing units appropriate to their needs. This might include maintaining a list or database of affordable or special needs housing options (public housing, private affordable units, other HOPWA projects, etc.) and referring clients to vacancies.
- **Housing Search Counseling:** Guiding individuals on how to search for housing effectively. This could involve teaching them how to look up ads, how to approach landlords, and what to consider when choosing a neighborhood (access to medical facilities, public transit, etc.).
- **Fair Housing Information:** Educating clients about their rights under fair housing laws and what to do if they face discrimination. Also, informing them about local housing codes and tenant rights, so they are empowered in landlord interactions.
- **Assistance with Applications:** Providing help with completing applications for housing, such as Section 8 voucher applications, public housing applications, or applications for other rental assistance or supportive housing programs. This might also cover helping gather necessary documentation (IDs, proof of income, etc.).
- **Resource Information:** Giving clients information about other housing-related resources, such as emergency shelter locations, transitional housing programs, legal aid for eviction prevention, utility assistance programs, home repair programs (for those who own homes), etc.
- **Tenant Education Workshops:** The sponsor might conduct workshops or printed guides on topics like "How to be a good tenant," "Understanding your lease," or "Budgeting for housing costs." While this borders on supportive services and housing counseling, it falls under broad housing information as long as only general advice is provided and not intensive one-on-one counseling (which would require a certified counselor).

2) Access and Delivery

Housing information services can be delivered through a variety of means:

- A housing specialist on staff who meets with walk-in clients or takes calls.
- A hotline or helpline for housing inquiries.
- Printed resource directories or an online housing resource webpage that the sponsor maintains.
- Outreach events, like participating in community health fairs to share housing resources for people with HIV.

Because these services can be offered to anyone with HIV (not just those enrolled in HOPWA housing assistance), this activity can serve as a front door or triage. For example, someone with HIV might call

asking for housing help; the housing information specialist can assess their needs, give them referrals, and if appropriate, refer them into the HOPWA program for direct assistance (if they're low-income and in need of TBRA or STRMU). If they're over income for HOPWA, the specialist can still assist by pointing them to other affordable housing or advising on strategies.

3) Tracking and Impact

The Project Sponsor should track the number of individuals who receive housing information services, even if they do not become full HOPWA clients. Often this is done by a simple log of inquiries or a short intake form for anyone seeking information. HUD does not require personal data on those who only get info & referral, but it's good to track the service count for program evaluation. If a person later applies for HOPWA, then they'd go through full intake.

4) Funding Considerations

Housing information services are typically a small portion of the budget (they are relatively low-cost, usually just staff time and materials). But they are very useful. The sponsor might fund, for instance, part of a position to do this or allocate some supportive services budget to it.

Example Scenario:

A client, John, is HIV-positive and has moderate income (say 90% AMI) and so does not qualify for TBRA or STRMU. However, he is looking to move to a more supportive environment or perhaps an age-restricted HIV-friendly apartment building. He contacts the HOPWA Project Sponsor. The Housing Information Services specialist provides John with information on:

- A senior housing complex that has units for people with HIV. How to apply to that complex and others.
- Contact info for the local Continuum of Care's coordinated entry in case he might need some other support.
- Advice on what documents he will need (ID, doctor's letter for any medical accommodation, etc.).
- They also explain fair housing rights and give him a pamphlet on housing discrimination protections. John uses this info to secure a unit; even though he didn't receive HOPWA financial aid, the service achieved housing stability for him.

Another example:

The sponsor might produce a Housing Resource Guide for People Living with HIV in Wisconsin, listing all known housing programs (HOPWA, Shelter Plus Care, Ryan White housing, etc.), landlords open to renting to clients with poor credit (if any identified), etc. They could distribute this through HIV clinics or ASOs. This is a form of housing information service at a broad scale.

5) Links to Other Programs

Housing information can be closely tied to Housing Opportunities Made Equal (HOME) tenant-based rental assistance referrals, Continuum of Care resources, etc. If the Project Sponsor also handles other housing programs, the housing info service can serve as a general housing referral hub for PLWHA, guiding them to whichever program fits (not only HOPWA, but maybe Section 8 or others).

6) Quality and Training

Staff providing housing information should be knowledgeable about:

- Local rental market conditions (typical rents, vacancy rates).
- Basic eligibility and contact info for all major housing assistance programs in the area.
- HIV/AIDS confidentiality (they must be careful not to inadvertently disclose a persons' status when making referrals or advocating with landlords).
- Fair housing law (to advise if discrimination might happen).
- Cultural competency (sensitivity to LGBTQ+ issues, etc., since a large portion of PLWHA are LGBTQ+ or have faced stigma).
- Possibly languages spoken by clients (or access to translation services) for non-English speakers.

7) Outreach

The Project Sponsor should advertise that housing information services are available. Key referral sources are medical case managers, HIV clinics, and community organizations. They should know that they can send clients or call on behalf of clients to the HOPWA housing info specialist for advice. As a result, some who might not have considered HOPWA or known about it can be connected.

The Project Sponsor should make housing information and referral a visible and accessible part of its program.

Chapter 11: Grievance and Termination of Assistance

HOPWA Project Sponsors must have clear, written policies for addressing client grievances and for the termination of assistance when necessary. These policies ensure that participants are treated fairly and that their rights to due process are protected, even in difficult situations where assistance may end.

This chapter outlines the requirements and procedures for grievances and terminations, in line with [24 CFR §574.310\(e\)](#) and good practice.

1) Grievance and Appeals Policy

A Grievance and Appeals Policy provides a way for program participants to formally complain or appeal any decision or action by the Project Sponsor that they believe adversely affects them. This includes, but is not limited to, decisions about denial of assistance, the type or level of assistance, changes in their assistance, or interactions with staff. Each Project Sponsor should develop a written Grievance and Appeals Policy that is given to clients (for example, at intake) and acknowledged by them (signing that they have received and understood it). Key elements of a Grievance and Appeals Policy should include:

- **Scope:** It should state what issues can be grieved and appealed. Generally, any decision by the program affecting a client's eligibility or level of benefits qualifies. For instance: denial of initial application, determination of ineligibility for a certain service, a reduction or termination of assistance, or disputes about program requirements.
- **Informal Resolution:** The policy may encourage clients to first discuss issues with their case manager or a supervisor informally. Many grievances can be resolved through communication (e.g., a misunderstanding about a policy could be clarified). However, if that does not resolve it, the formal process is available.
- **Procedure:** The formal grievance and appeals procedure usually includes:

- **Written Notice of Adverse Decision:** Whenever the Sponsor makes a decision to deny or terminate assistance, or reduce benefits, they must provide the client with a written notice explaining the reason for that decision. The notice should be easy to understand and should reference any program policies or rules involved.
- **Opportunity to Review Records:** The policy should allow the client, upon request, to examine their case file and any evidence or documents relied on for the decision. (Confidential info about others should be redacted, but the client has a right to see what the decision was based on.)
- **How to File a Grievance:** The policy must specify how a client can formally appeal or grieve. Typically, the client must submit a written grievance or appeal request to a program supervisor or a grievance committee within a certain timeframe (for example, within 10 or 15 days of the adverse decision notice).
- **Fair Review by an Unbiased Party:** The client is entitled to have their appeal heard by someone not directly involved in the original decision. Often, this could be a program manager or director who wasn't the caseworker, or perhaps a panel that could even include an external stakeholder or neutral party. The point is to avoid the person who made the decision being the sole reviewer of that decision.
- **Opportunity to Present Objections:** The policy should allow the client to present their side of the story, whether in writing or at a hearing. Some programs use a paper review; others allow or require a meeting/hearing. The client should be allowed to bring someone to support or represent them (like a legal advocate or friend) if they wish.
- **Prompt Written Decision:** After the review, the decision-maker should provide a written determination to the client, explaining whether the original decision is upheld or overturned, and the reasoning. This should be done promptly (e.g., within 5 business days after a hearing).
- **Finality and Further Appeal:** The policy should state whether the decision after the grievance review is final or if there's another level (in some agencies, one might appeal to the Executive Director, for instance, as a final stage). Generally, after the internal grievance process, the next step might be legal avenues outside the agency if the person chooses (like court, but in practice that's rare due to cost and time).

During the grievance process, if the issue is pending termination of assistance, the Project Sponsor may continue assistance until the grievance is resolved (unless the cause is something immediate like threat to safety). For example, if a client is slated to be terminated for alleged program rule violations and they file a grievance, the Project Sponsor might halt termination actions (like not removing them from housing) until the grievance is decided – as long as that doesn't endanger anyone or break a law.

All clients must be informed of the grievance process at program entry.

Note: Per regulation, grievance procedures are required at minimum for termination of assistance decisions, but it's best practice to allow grievances for other issues too.

2) Termination of Assistance

Termination of a client's participation in the HOPWA program is a serious matter that should only occur in specific circumstances and in compliance with HUD regulations. [24 CFR §574.310\(e\)](#) outlines that a grantee (or Project Sponsor) may terminate assistance to a participant for cause but must ensure due

process. “For cause” generally means the participant has failed to comply with program requirements or has engaged in behavior detrimental to the program or other residents. Reasons that may lead to termination include (but are not limited to):

- **Violations of Program Requirements or Policies:** For example, knowingly providing false information on an application or recertification (fraud), persistent failure to pay their share of rent, refusal to recertify income or attend required meetings, or serious or repeated breach of their housing search or participation agreements.
- **Threat or Danger:** If a participant’s behavior threatens the safety or well-being of staff or other residents (for instance, violent behavior, harassment, bringing weapons on premises), immediate termination might be warranted. This overlaps with lease violations as well, but safety is paramount.
- **No Longer Eligible:** If a participant no longer meets basic eligibility (income rises above 80% at recertification, or the person with HIV is no longer in the household due to death or leaving – more on survivorship below), then assistance would eventually terminate as they’re outside program scope. However, in case of death, there are special provisions (surviving family members).
- **Program Closure or Funding Cuts:** In rare cases, assistance might terminate if funding is lost. This is not the participant’s fault; the grievance procedure might not change the outcome, but they should receive notice and referrals.

3) Due Process Requirements

When termination is considered, HUD mandates that programs must provide a formal process which, at minimum, includes the following protections (these align with our grievance outline):

- **Written Notice:** The sponsor must give the participant a written notice containing a clear statement of the reasons for termination. For example, “Your assistance is being terminated because on three occasions you failed to pay your portion of rent, and on [dates] you engaged in behavior that violated the terms of your lease (police report of disturbance), which is a serious program violation.”
- **Right to Review Evidence:** The participant is allowed to see the information that the decision is based on (their file, incident reports, etc.), so they can contest facts if needed.
- **Opportunity to Appeal/Present Objections:** Before termination is finalized, the participant can appeal through the procedure, presenting their side to someone not directly involved as noted above. They can submit written objections or have a hearing to state why they believe termination is unwarranted or to present mitigating evidence (for instance, maybe they did not pay rent because they were hospitalized unexpectedly, and now they can pay).
- **Prompt Final Decision in Writing:** After the review, if termination is upheld, they should get a final decision letter.

Only after this process can the actual termination occur (e.g. stopping paying TBRA or requiring them to vacate a facility). If a situation is extreme (e.g., participant poses immediate threat), the program might separate them (e.g., have them leave the facility for safety) but still do the due process on paper concurrently. In such cases, perhaps an emergency termination can be done with the right to appeal after – but generally, try to do process first unless imminent danger.

4) Assistance After Termination

If a participant is terminated for cause, the Project Sponsor may determine whether and under what conditions they could be served in the future. HOPWA does not forbid someone who had been

terminated from one project from ever getting help again, but practically, if cause was serious, a Project Sponsor may choose not to re-enroll that individual. Project Sponsors should be careful to ensure that any re-admission policy is fair and consistent (and not discriminatory). Also, termination from HOPWA does not bar them from other programs (though other housing programs might have their own screening and might ask the sponsor for a reference).

5) Surviving Family Members (Post-Death of Client)

A special termination scenario is when the HOPWA-eligible person (the one with HIV/AIDS) dies. According to HOPWA regulations:

If the household includes other family members who were living with the client at the time of death and were listed on the lease/application, those surviving family members are allowed to continue receiving HOPWA housing assistance for a grace period of up to one year. This is often referred to as “survivorship rights.”

The Project Sponsor must have a policy stating the length of grace period they will allow (it could be the full 1 year or a shorter period depending on circumstances, but up to 1 year is permitted). DEHCR recommends the full year to give the family time to transition.

During that grace period, HOPWA assistance (like TBRA) can remain for the family even though technically no member has HIV. After that period, HOPWA assistance ends for that family. By then they hopefully secure other housing or become self-sufficient.

If among the surviving family is another person with HIV/AIDS who was previously just a family member, that person can become the new “eligible person” for HOPWA and assistance could continue beyond the year because the household still qualifies (the reg suggests if one of survivors has HIV and can show residency prior and was part of certification, they can essentially take over the eligibility). They would then be treated as the HOPWA client going forward, presumably with a recertification of income, etc.

It’s important the sponsor handle this sensitively: at a time of bereavement, dealing with housing loss is hard, so the grace period is humane. The Project Sponsor should immediately upon a clients’ death reach out to the family, express condolences, and inform them of how long they can stay with assistance and help plan for afterwards (help them apply for other housing or vouchers).

6) Documenting Terminations

Every termination should be well-documented. Keep copies of the notices, evidence, hearing minutes or notes, and final decision in the client file. If a client voluntarily leaves, document that too (not a termination for cause, but an exit). If a client dies, document date of death and any continuing assistance to family with timeline.

7) Eviction vs. Termination

If a client is evicted by a landlord (in TBRA), that likely triggers termination of TBRA because they no longer have an assisted unit. However, the Project Sponsor should still do a review if appropriate. If the client wants to appeal an eviction, the Project Sponsor might hold off termination until an eviction appeal is decided. Generally, an eviction ends TBRA because there is no unit to assist. The client could potentially reapply for a new TBRA if the issue that caused eviction is resolved.

8) Grievance and Termination Training

Staff (especially case managers and program managers) should be trained in these termination and grievance procedures. They should know that they cannot just drop someone without process, except maybe immediate safety exceptions. They should also know how to document incidents that might lead to termination (incident reports, etc.) because those become evidence in the due process. Also, they should treat clients with respect even when issues arise, to try to resolve issues short of termination when possible.

9) Progressive Discipline

DEHCR encourages a “progressive discipline” approach: e.g., verbal warning, written warning, final warning, then termination if necessary. This gives clients chances to correct behavior. Only serious one-time incidents (violence, etc.) skip steps. This approach should be outlined in the program rules and is a good practice to avoid unnecessary terminations and utilize termination only as a last resort.

10) Confidentiality in Grievances and Appeals

If a grievance and appeals panel involves outside members or other clients, be cautious about confidentiality (especially about HIV status). Likely the panel should be internal or bound by confidentiality.

The termination and grievance policies ensure fairness and should be consistently applied. By following them, the Project Sponsor protects itself from liability and ensures clients are not arbitrarily or mistakenly removed from the program. It fosters a culture of transparency and accountability within the program. Clients who understand the rules and consequences, and see that the process is fair, are more likely to comply and less likely to cause issues that lead to termination in the first place.

Chapter 12: Data Collection and Reporting Requirements

Accurate data collection and reporting are essential for demonstrating program outcomes, securing continued funding, and ensuring transparency in the use of funds. Wisconsin’s HOPWA Project Sponsor must comply with all HUD and DEHCR reporting requirements. This chapter outlines the primary data systems and reports required.

1) Homeless Management Information System (HMIS)

HUD requires that HOPWA grantees collect client-level data in a Homeless Management Information System (HMIS) or a comparable database for areas like HOPWA. All HOPWA project sponsors are required to participate in HMIS or a comparable database and enter data for HOPWA clients. The only exception is that if a client is receiving only Housing Information Services (and not financial assistance or ongoing case management), the Project Sponsor may choose to track those contacts outside HMIS for privacy reasons. However, for anyone enrolled and receiving HOPWA housing or services, an HMIS record is expected.

Data elements: The sponsor must input required Universal Data Elements (such as Name, Social Security Number, Date of Birth, Race, Ethnicity, Gender, etc.) and Program-Specific Data Elements for HOPWA (which include information like household income, housing status, services provided, and outcomes upon exit). HUD provides an HMIS Data Standards manual that includes HOPWA-specific elements.

Privacy in HMIS: Client confidentiality is crucial. Wisconsin's HMIS has protocols to protect sensitive information (for example, HIV status is not explicitly recorded; instead, program enrollment in HOPWA can imply status but that data is accessible only to authorized users). Clients should be informed about HMIS and asked to sign an HMIS consent form in accordance with Wisconsin's HMIS policies. Clients have the right to refuse to share their personal information with other agencies in HMIS (and a right to an anonymous entry if demanded, though this can complicate service delivery). The Project Sponsor must follow the Wisconsin HMIS privacy notice and only use HMIS data for legitimate program purposes.

Training and Access: The Project Sponsor must ensure appropriate staff are trained to use HMIS. Typically, each user must sign an HMIS user agreement and complete training provided by the HMIS Lead Agency (the Institute for Community Alliances, ICA, in Wisconsin). HMIS is a secure web-based application; data entry should be timely (ideally real-time or within a few days of service). DEHCR may require that at least one staff member attend HOPWA-specific HMIS training offered by HUD or the HMIS Lead. Noncompliance with HMIS (e.g., failing to enter data, or data quality issues) could result in sanctions by DEHCR, as accurate HMIS data is needed for reports.

2) Monthly and Quarterly Reporting

DEHCR requires monthly reporting from the Project Sponsor to track expenditures and client data on an ongoing basis. The exact format may be a monthly narrative or data report and a financial report.

Generally:

- **Financial Report:** A reimbursement request or expenditure report is submitted monthly. This details how much was spent on each budget line (STRMU, TBRA, Supportive Services, Admin, etc.) and is used by DEHCR to process the drawing of funds. The Project Sponsor should maintain supporting documentation for all expenses (invoices, payroll records, etc.) even if not all are submitted each month.
- **Program Data Report:** The Project Sponsor may be asked to provide a simple summary of program activity each month – for example, number of new clients served, number of households receiving each type of assistance that month, brief narratives on success stories or issues, etc. For TBRA specifically, DEHCR has required a Monthly HOPWA TBRA HMIS Data Report which is essentially an HMIS-generated report of active TBRA clients and data quality checks. This report is due by the 15th of each month (covering the prior month) and is emailed to the Grant Specialist at DEHCR. The specialist may also periodically request HMIS data snapshots or setup forms to ensure data accuracy.
- If the Project Sponsor fails to submit reports on time, DEHCR may delay payment or issue corrective actions. It is important to meet the 15th-of-the-month deadline (or whatever schedule is specified) for reporting.

Quarterly, DEHCR may compile information to check spending rates and performance. The Project Sponsor should spend funds at a reasonable pace (not front-loaded in one quarter or all at end). DEHCR expects drawdowns to be roughly proportional to time elapsed (for example, around 25% of funds spent by end of quarter 1, etc., unless there is a known ramp-up). If underspending or overspending patterns emerge, DEHCR will reach out to adjust or recapture funds as needed.

3) Annual Progress Report (APR/ CAPER)

At the end of HUD's Federal Fiscal Year (April 1 – March 31), HUD requires grantees to report comprehensive program results in the HOPWA Annual Progress Report (APR) for competitive grants or the Consolidated Annual Performance and Evaluation Report (CAPER) for formula grants. Wisconsin, as a formula grantee, completes a HOPWA CAPER which includes data on households served, types of assistance provided, expenditures, and outcomes. The Project Sponsor must provide the necessary data to DEHCR to complete this report. Project Sponsors are expected to comply with terms and conditions established by HUD regulations in [24 CFR 574.520](#) for monitoring, evaluation and record keeping by DEHCR and HUD. Subrecipients are required to demonstrate compliance with these provisions.

4) Other Reports and Recordkeeping

In addition to formal reports, the Project Sponsor should maintain internal records that could be requested by DEHCR or HUD:

- **Beneficiary Records:** Complete client files (see [Chapter 6](#) and [Chapter 7](#) for what goes into STRMU or TBRA files). Files should be retained for the period required by HUD – generally 3 years after grant closeout at a minimum (or longer if any litigation or audit is pending). DEHCR's contract may specify a retention period.
- **Financial Records:** Account ledgers, bank statements, payroll registers for staff paid by the grant, receipts for payments (like rent paid to landlords, utility bills, etc.), and proof of match (if any required – HOPWA formula does not require match, but if leveraging is promised, document it). These should be organized by grant year for auditing purposes. Annual financial audits (single audit if federal funds > \$750k) must include HOPWA in the scope if applicable, and copies of audit reports should be provided to DEHCR.
- **Equipment Inventory:** If any equipment was purchased with HOPWA funds (e.g., computer for program use), keep an inventory and follow [2 CFR Part 200](#) rules for equipment (tagging, inventory tracking, etc.). Usually, HOPWA grants have minimal equipment purchases.
- **Program Income:** While uncommon in HOPWA (since clients do not pay fees), program income could occur (for example, if a landlord returns a security deposit to the sponsor, or interest is earned on HOPWA funds). The sponsor must track and report any program income and reuse it for HOPWA-eligible activities or return it to HUD. DEHCR should be notified of any program income.

Chapter 13: Financial Management

Proper financial management is essential for the integrity and success of the HOPWA program. This chapter outlines key financial management requirements and practices, including budgeting, disbursement, accounting, and audit compliance. The goal is to ensure HOPWA funds are used efficiently, responsibly, and in compliance with federal financial regulations ([2 CFR Part 200](#)) and HUD expectations. Per [24 CFR 574.450](#), the Project Sponsor must maintain and make available records of payments to property owners.

1) Budgeting and Use of Funds

- **Approved Budget:** Each HOPWA grant comes with an approved budget that allocates funds to various categories (often categories like TBRA, STRMU, PHP, Supportive Services, Housing Information, Resource Identification, and Administration). The Project Sponsor must use funds

according to these approved line items. Deviating from the budget (for example, spending more on supportive services than budgeted and less on TBRA) requires prior approval from DEHCR via a budget amendment request. The Project Sponsor should regularly compare expenditures to the budget to ensure they are on track.

- **Allowable Costs:** Funds can only be used for eligible HOPWA activities and reasonable costs associated with operating those activities. [2 CFR 200](#) (Uniform Administrative Requirements, Cost Principles, and Audit Requirements) applies – costs must be necessary, reasonable, allocable, and documented. For example, staff salaries can be charged for time spent on HOPWA activities (with timesheets or payroll records to substantiate), rent/lease of office space can be charged proportionally if that space is used for HOPWA, etc. Unallowable costs might include things like entertainment, alcohol, lobbying expenses, or any client costs not permitted by HOPWA (like direct medical services, as discussed, or payment of personal debts beyond housing-related).
- **Administrative Cost Cap:** Administrative costs are capped at 7% of the grant for the Project Sponsor. The Project Sponsor must ensure that expenditures they categorize as “Administration” (e.g., general management, accounting, coordination, reporting expenses) do not exceed 7% of the total grant. If admin expenses are lower than anticipated, those funds generally cannot be moved to program costs without an amendment.
- **Spending (Drawdown Management):** The Project Sponsor should draw funds in a manner proportional to program progress. For example, if TBRA is 50% of the budget, roughly 50% of funds drawn to mid-year should be for TBRA.

2) Financial Management Systems

The Project Sponsor must have a financial management system that can track HOPWA funds separately by grant and budget category. The system should provide accurate, current, and complete disclosure of the financial results of HOPWA activities. Key elements:

- **Chart of Accounts:** that includes specific account codes for HOPWA expenses. E.g., separate codes for HOPWA TBRA payments, HOPWA staff salaries, etc.
- **Accounting Method:** Generally, accrual basis is preferred (record costs when incurred, not just when paid, and revenue when earned). At minimum, a system to account for expenditures and obligations at any time.
- **Internal Controls:** Segregation of duties (the person approving expenses is different from the person cutting checks, etc.), proper authorization of transactions, physical safeguards for assets (like blank checks), etc. This prevents misuse or errors.
- **Supporting Documentation:** All expenses charged to HOPWA must be backed by source documentation: receipts, invoices, timesheets, mileage logs, lease agreements (for facility costs), etc. These should be kept on file (electronically or paper) and be available for monitoring or audit. The Sponsor’s financial staff should verify that documentation is adequate before including costs in a reimbursement request.
- **Indirect Cost Rates:** If the organization has an approved federal indirect cost rate (or wants to use the de minimis 10% MTDC rate), it can apply that to the HOPWA grant for indirect costs. Indirect costs count towards the 7% admin cap (since admin includes general overhead). The Sponsor must have documentation of the rate (if approved by a cognizant agency) or use the 10% of modified total direct costs if eligible and not previously using a rate. They must be consistent – if they budgeted an indirect cost

usage, they must charge it properly. If they do not use an indirect rate, then they should directly charge costs to either admin or program based on actual use (e.g., if an executive director's time is partly HOPWA, maybe allocate some salary to admin, etc., but then that counts in the 7%).

3) Payment and Reimbursement Process

Monthly Reimbursement Requests: Typically, HOPWA is a reimbursement grant (though formula grants allow advance draw in IDIS, DEHCR likely operates on reimbursements from the Sponsor). The Sponsor should submit a monthly or periodic Request for Funds to DEHCR, detailing expenditures by category for that period. This request should align with the Sponsor's internal accounting records.

DEHCR then reviews and approves and disburses funds. The Sponsor should ensure:

- All expenditures on the request are within the grant period and budget.
- They have not requested these funds before (avoid duplicate draws).
- The math is correct and it's signed by an authorized official.

4) Cash Management

The Project Sponsor should minimize the time between receiving HOPWA funds and paying out to vendors/landlords (the federal rules on cash on hand). Ideally, the Project Sponsor pays expenses, then requests reimbursement (so always out-of-pocket a short time). If advances are provided, they must be expended quickly (usually within 3 days by federal standard for advances). Likely, all transactions will be on a reimbursement basis. The Project Sponsor should maintain a program income account if any program income arises (like returned deposits) and use those funds before drawing new federal funds (as required by regulations).

5) Tracking of Client Assistance Funds

For client-based assistance like TBRA, STRMU, etc., it's wise to maintain subsidiary ledgers or logs that are tied to financial accounts. E.g., a rent payment log listing each client and landlord paid each month and amount, which can be cross-referenced to the general ledger. This helps with monitoring (DEHCR or HUD can sample check that a payment in GL has a corresponding client record and approval). It's also needed for CAPER data (like total households served by STRMU matching the count of payments).

6) Financial Reporting

[Chapter 12](#) covered monthly and annual performance reporting. In financial terms, at year end the Project Sponsor might need to assist DEHCR in preparing financial parts of CAPER (like total spent in each category, any program income received/used). Also, if funds remain unspent at year's end, DEHCR will want to know why. Project Sponsors should avoid large unspent balances because it could indicate under-performance.

7) Budget Revisions

If during the year the Sponsor sees they need to reallocate funds (e.g., STRMU demand is far higher and TBRA demand lower, they might want to move funds from TBRA to STRMU), they must request a budget modification from DEHCR. DEHCR/HUD will consider allowability and impacts to performance outcomes. Similarly, if supportive services needed a boost and housing costs less, etc. Major changes typically

require HUD approval as well (for formula, HUD likes to see changes at CAPER or via amendment if 10% threshold changes, etc.). Always communicate with DEHCR before spending differently.

8) Financial Monitoring and Audits

- **DEHCR Monitoring:** DEHCR's Grant Specialist or financial monitor may periodically review financial records (possibly on-site or desk review). They will check things like proper documentation, adherence to budget, etc. The Project Sponsor should cooperate fully and correct any findings promptly.
- **Single Audit:** If the Project Sponsor expends \$750,000 or more in federal awards in a fiscal year (including all federal sources), it must have a Single Audit (in accordance with [2 CFR Part 200, Subpart F](#)). If HOPWA is a major program in that audit, the Project Sponsor's auditor will test compliance (like allowable costs, eligibility, etc.). The Project Sponsor must submit that audit report to the Federal Audit Clearinghouse and provide a copy or notify DEHCR of results. DEHCR will follow up on any HOPWA-related audit findings. Even if under \$750k, DEHCR might require some form of financial statements or audit.
- **Financial Statement:** If a Single Audit is not required, Project Sponsors should produce annual financial statements (audited or reviewed by a CPA). DEHCR may request these statements to ensure the agency is financially sound.
- **Procurement:** If the Sponsor uses HOPWA funds to procure goods or services (like hiring a contractor to do repairs on a facility, or purchasing a van for transportation, or contracting a consultant), they must follow procurement rules ([2 CFR 200.317-326](#)). Typically for non-profits, that means using competition and documenting price reasonableness:
 - Micro-purchases under the micro threshold (which is \$10k currently) can be made without quotes if price is fair.
 - Small purchases (e.g., \$10k-\$250k range) require getting quotes from an adequate number of sources. Above the simplified acquisition threshold (\$250k) requires formal bids or proposals (IFB/RFP).
 - Avoid any conflict of interest (Project Sponsor employees cannot steer contracts to themselves or family, etc. and must disclose any potential conflicts).
 - The Project Sponsor should have written procurement policies (often they do if they get other federal funds). For example, if a Sponsor subcontracts part of the HOPWA services (like hiring an ASO to do supportive services with HOPWA funds), that's a subrecipient arrangement requiring a sub-agreement and monitoring; if they hire an accountant as a contractor, that's procurement and needs quotes if above threshold.

9) Property and Equipment Damage

If the Sponsor buys any equipment (tangible personal property with per-unit cost above \$5,000) with HOPWA funds, they must inventory it and use it for HOPWA purposes and not dispose of it without following federal rules (which often require offering to HUD or selling and crediting program if above certain value). [2 CFR part 200](#) governs these costs.

10) Program Income

Although rare in HOPWA, program income (i.e: interest earned, or refunds of security deposits, or rent payments if sponsor uses HOPWA to pay entire rent and then collects part from client) must be reused for HOPWA-eligible activities by deducting program income from draw requests. Program income must

be drawn or utilized before grant funds. The Project Sponsor should report any program income to DEHCR in monthly reports and the CAPER.

11) Financial Management Training

All Project Sponsors are required to have at least one staff complete HUD's HOPWA financial management online training every 3 years as a HUD requirement. The Project Sponsor should maintain that certificate and ensure new staff get trained. They should also keep up with any HUD notices or webinars on financial topics (like changes in grant administration, OMB rule changes, etc.).

12) Record Retention

Financial records, supporting documents, and all pertinent records must be retained for at least 3 years after the grant is closed out (which for formula might be defined as after the CAPER submission or final financial report). If any litigation or audit is started before that 3-year clock ends, records must be kept until it is resolved and then 3 years after resolution. Electronic storage is acceptable if it's reliable and legible.

13) Audit Trail

The ultimate test of financial management is a solid audit trail: from each source of funds to expenditures, and from each expenditure back to source docs and approvals. The Project Sponsor should be able to show for any given dollar drawn from HUD:

- It went into their bank (tracked in accounting). It was expended for X purpose.
- The invoice and cleared check for that purpose.
- How that purpose ties to a client or program objective.

By adhering to strong financial management practices, the Project Sponsor will ensure that funds are used to maximize benefit for eligible households, maintain the trust of stakeholders, and avoid any misuse or need to repay funds. It also positions the program for continued funding, as HUD and the State will see that money is handled prudently and effectively.