

# HIV/AIDS Housing

U.S. Department of Housing and Urban Development  
Office of HIV/AIDS Housing



## Housing Opportunities for Persons With AIDS (HOPWA) Program Guidelines

July 2017



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[www.columbiasc.net](http://www.columbiasc.net)



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## SECTION 1

### INTRODUCTION

#### Housing Opportunities for Persons with AIDS (HOPWA) Program

Housing Opportunity for Persons With AIDS (HOPWA) funds are authorized by the AIDS Housing Opportunity Act and as amended by the Housing and Community Development Act of 1992. The program is designed to provide states and local jurisdictions with resources to develop long-term, comprehensive strategies for meeting the housing needs and reduction of homelessness in low-income persons with acquired immunodeficiency syndrome (AIDS) and their families.

The City of Columbia administers HOPWA funding as a formula entitlement for the City of Columbia and the following counties: Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda.

All City of Columbia HOPWA Grant awards are made through a competitive application process based on client needs, gaps in services, and ability of agency to successfully implement the program. The City HOPWA funding process opens in the fall for the fiscal year funding beginning the following July 1<sup>st</sup>. Each fiscal year, the City of Columbia receives a HOPWA formula allocation HUD to ensure that supportive services, short-term emergency assistance, and permanent housing vouchers are available to eligible HOPWA clients in all six counties of the Columbia Eligible Metropolitan Statistical Area (EMSA).

HOPWA funding allocated each year for the City's 2015-2019 priority order of funding HOPWA services:

1. Permanent Housing Program
2. Permanent Housing Vouchers
3. Emergency Housing Assistance
4. Supportive Services

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City of Columbia Administration (3%)

HOPWA funds may be used for housing and related supportive services to prevent homelessness as described in HUD regulations 24 CFR 574.300 (eligible activities). HOPWA funds may be used for the following activities:

- **Housing Information Services**

Including, but not limited to, counseling, information, and referral services to assist an eligible person to locate, acquire, finance, and maintain housing. This may also include fair housing counseling for eligible persons who may encounter discrimination on the basis of race, color, religion, sex, age, national origin, familiar status, or handicap. Other examples could include: staff time to create and maintain a listing of 'friendly landlords' or to develop a housing brochure.

- **Resource Identification**

Establish, coordinate, and develop housing assistance resources for eligible persons

- **Project- or Tenant-based Rental Assistance**

Housing units must pass housing quality standards inspection. Clients pay a portion of their income (30% adjusted gross or 10 gross income). Other standards apply.

- **Short-term Emergency Rent, Mortgage, and Utility Payments**

Short-term payments of rent, mortgage, and utilities for up to 21-weeks out of 52-week in order to prevent homelessness. Other restrictions apply.

- **Supportive Services**

Including, but not limited to, health, mental health, assessment, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals. HOPWA funded supportive services must link clients to stable permanent housing.

- **Operating Costs**

For housing units including maintenance, security, operation, insurance, utilities, furnishings, equipment, supplies, and other incidental costs

- **Technical Assistance**

- **Acquisitions**

Rehabilitation, conversion, lease, and repair of facilities; to provide housing and services. Minimum use period is ten-years for units acquired, rehabilitated or repaired.

- **New Construction**

For single room occupancy (SRO) dwellings and community residences only. Minimum use period is ten-years for units constructed.

- **Administrative Expenses**

Each project sponsor receiving grants under HOPWA may use not more than seven percent (7%) of its programmatic costs in administrative costs. Agencies are required to submit annual a copy of their indirect cost allocation report to justify administrative charges.

**HOPWA funds cannot be used for AIDS drug assistance or other healthcare costs. Refer to HUD memo dated 7/13/99 for more information (Section 13).**

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For additional information, refer to HUD regulations at 24 CFR 574, [hudhre.info](http://hudhre.info) or contact:

City of Columbia  
Community Development Department.  
1225 Lady St., Suite 102, P.O. Box 147  
Columbia, SC 29217  
Phone 803-545-3373  
Fax 803-255-8912  
[www.Columbiasc.net/communitydevelopment](http://www.Columbiasc.net/communitydevelopment)

## SECTION 2

### Glossary of HOPWA Related Terms

**AIDS** Acquired Immunodeficiency Syndrome. A person with HIV infection is diagnosed with AIDS when either a) they develop an opportunistic infection defined by the Centers for Disease Control and Prevention as an AIDS indication, or b) on the basis of certain blood tests related to the immune system.

**CASE MANAGEMENT** The central component of HIV/AIDS care is case management. Case managers coordinate all the care a client receives from all providers in the community. Typically, case management services are provided by agencies separate from the housing providers. When a case management client resides in a residence, however, the residential staff members have the most frequent contact with the resident and often are responsible for the care coordination. Case management is also provided through other social service systems.

**CONTINUUM OF CARE** An approach that helps communities plan for and provide a full range of emergency, transitional, and permanent housing and service resources to address the various needs of homeless persons. The approach is based on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs—physical, economic, and social. Designed to encourage localities to develop a coordinated and comprehensive long-term approach to homelessness, the Continuum of Care consolidates the planning, application, and reporting documents for the U.S. Department of Housing and Urban Development's Shelter Plus Care, Section 8 Moderate Rehabilitation Single-Room Occupancy Dwellings (SRO) Program, and Supportive Housing Program.

**EMSA** Eligible metropolitan (statistical) area. Geographic areas based on population and cumulative AIDS cases to receive federal funds through the Ryan White CARE Act and Housing Opportunities for Persons with AIDS (HOPWA) program.

**FAIR MARKET RENT (FMR)** Rents set by the U.S. Department of Housing and Urban Development (HUD) for a state, county, or urban area that define maximum allowable rents for HUD-funded subsidy programs. HUD calculates FMR to be at the 40<sup>th</sup> percentile of recent moves, excluding apartments built within the past two years, meaning that 40 percent of recent movers paid less, and 60 percent paid more.

**FAMILY** The term "family" encompasses nontraditional households, including families made up of unmarried domestic partners. A family is a self-defined group of people who may live together on a regular basis and who have a close, long-term, committed relationship and share responsibility for the common necessities of life. Family members may include adult partners, dependent elders, or children, as well as people related by blood or marriage. A family most simply is defined as 2 or more people who are related OR important to each other's care.

**HIV** Human Immunodeficiency Virus. The virus that causes AIDS. HIV disease is characterized by a gradual deterioration of immune functions. During the course of infection, crucial immune cells, called CD4+ T cells, are disabled and killed, and their numbers progressively decline.

**HOMELESS PERSON** According to the U.S. Department of Housing and Urban Development, a homeless person is an individual or family who 1) lacks a fixed, regular, and adequate night-time residence, 2) has a primary night-time residence that is a) a publicly supervised or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill); b) an institution that provides a temporary residence for individuals intended to be institutionalized; c) a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings. Individuals paying more than 50 percent of their income for housing are also considered at such high risk for homelessness that they are included in the definition of homeless for some federal programs. The term "homeless individual" does not include any individuals imprisoned or otherwise detained under an act of federal or state law.

**HOPWA** Housing Opportunities for Persons with AIDS. A U.S. Department of Housing and Urban Development program which pays for housing and support services for people living with HIV/AIDS and their families. Created by an Act of Congress in 1990 & authorized by the AIDS Housing Opportunity Act of 1992.

**HOUSING QUALITY STANDARDS (HQS)** Standards set by the U.S. Department of Housing and Urban Development (HUD) to ensure that all housing receiving HUD financial assistance meets a certain level of quality. HQS requires that recipients of HUD funding provide safe and sanitary housing that is in compliance with state and local housing codes, licensing requirements, and any other jurisdiction-specific housing requirements.

**HUD** U.S. Department of Housing and Urban Development.

**LOW-INCOME FAMILY** Family whose income does not exceed 50 percent of the median income for the area, as determined by the U.S. Department of Housing and Urban Development (HUD) with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of findings that such variations are necessary because of prevailing levels of construction costs or Fair Market Rents, or unusually high or low family incomes.

**MASTER LEASE** See Project Based Rental Assistance

**MCKINNEY-VENTO ACT** The primary federal response targeted to assisting homeless individuals and families. The scope of the Act includes: outreach, emergency food and shelter, transitional and permanent housing, primary health care services, mental health, alcohol and drug abuse treatment, education, job training, and child care. There are nine titles under the McKinney-Vento Act that are administered by several different federal agencies, including the U.S. Department of Housing and Urban Development (HUD). McKinney-Vento Act Programs administered by HUD include: Emergency

Shelter Grant Program, Supportive Housing Program, Section 8 Moderate Rehabilitation for Single-Room Occupancy Dwellings, Supplemental Assistance to Facilities to Assist the Homeless, and Single Family Property Disposition Initiative. Also see: Emergency Shelter Grants, Federal Emergency Management Administration, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single-Room Occupancy Dwellings, and Supportive Housing Program.

**MODERATE INCOME** An individual or family whose income is between 50 percent and 80 percent of the median income for the area, as determined by the U.S. Department of Housing and Urban Development (HUD), with adjustments for smaller or larger families. HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of findings that such variations are necessary because of prevailing levels of construction costs or Fair Market Rents, or unusually high or low family incomes.

**MULTIPLY DIAGNOSED** To be diagnosed with HIV/AIDS and also have histories of other disabilities. This term generally refers to people who are HIV-positive and have chronic alcohol and/or other drug use problems and/or a serious mental illness. The terms “dually diagnosed” and “triply diagnosed” are also used.

**PERMANENT HOUSING** Housing which is intended to be the tenant’s home for as long as they choose. In the supportive housing model, services are available to the tenant, but accepting services cannot be required of tenants or in any way impact their tenancy. Tenants of permanent housing sign legal lease documents.

**PERSON WITH A DISABILITY** A person who is determined to: 1) have a physical, mental, or emotional impairment that is expected to be of continued and indefinite duration, substantially impedes his or her ability to live independently, and is of such a nature that the ability could be improved by more suitable housing conditions; or 2) have a developmental disability, as defined in the Developmental Disabilities Assistance and Bill of Rights Act.

**PROJECT-BASED RENTAL ASSISTANCE** Rental assistance that is tied to a specific unit of housing, not a specific tenant. Tenants receiving project-based rental assistance give up the right to that assistance upon moving from the unit. Also see Rental Assistance, Shallow Rent Subsidy, and Tenant-based Rental Assistance.

**RYAN WHITE CARE ACT** Ryan White Comprehensive AIDS Resources Emergency (CARE) Act. A program of the Health Resources and Services Administration (HRSA) providing funds for health care and supportive services for people living with AIDS. Created by an Act of Congress in 1990.

**SECTION 8** A federal program operated by local housing authorities providing rental assistance to low-income persons and administered by the U.S. Department of Housing and Urban Development. The Section 8 *certificate* program typically includes a maximum rent for a metropolitan area or county. Individuals receiving assistance under a certificate program must find a unit, which complies with rent guidelines, and pay 30 percent of their income for rent. Under the Section 8 *voucher* program, the local housing authority determines a standard amount of rental assistance an individual or family will

receive. The tenant would pay the difference between the amount of assistance and the actual rent, which may require the tenant to spend more than 30 percent of their income on rent. Both the Section 8 voucher and certificate programs are tenant-based programs, meaning the subsidy is specific to the tenant as opposed to the unit. Under the *project-based assistance* program, a public housing authority may target up to 15 percent of its Section 8 certificate allocation to specific housing projects, ensuring that the subsidy will remain with the properties.

**SHORT TERM EMERGENCY RENTAL MORTGAGE UTILITY (STRMU) ASSISTANCE** Emergency housing assistance provided to address an immediate housing crisis (maximum time period 21 weeks each year) —for people who are in imminent risk of becoming homeless. The assistance is emergency rent, mortgage or utility payments to prevent loss of residence.

**SRO** Single-Room Occupancy. Refers to studio apartments, which provide very limited cooking facilities and typically have shared bathrooms. They are often in rehabilitated hotels, and can be used for emergency, transitional, or permanent housing.

**SUPPORTIVE HOUSING** Housing, including housing units and group quarters, which include on- and off-site supportive services.

**SUPPORT SERVICES** Services provided to individuals to assist them to achieve and/or maintain stability, health, and improved quality of life.

**TENANT-BASED RENTAL ASSISTANCE (TBRA)** A form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. The assistance is provided for the tenant, not any specific housing unit. Also see Project-based Rental Assistance, Rental Assistance, and Shallow Rent Subsidy.

**TRANSITIONAL HOUSING** A project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period approved by the U.S. Department of Housing and Urban Development (HUD).

## SECTION 3

### **HOPWA Grantee & Sponsor Contact Information**

#### **City of Columbia**

Community Development Department 803-545-3373  
Dollie Bristow, CD Administrator [dbristow@columbiasc.net](mailto:dbristow@columbiasc.net) 803-255-8912 Fax

- HOPWA Administration

#### **Case Management**

University of South Carolina Dept. of Medicine 803-343-3437  
Kristen Connors, Director, Case Management Services, [kristenConnors@uscmed.sc.edu](mailto:kristenConnors@uscmed.sc.edu)

- Providing case management services to clients residing in the counties of Richland, Lexington, Kershaw, and Fairfield.

Palmetto AIDS Life Support Services 803-779-7257  
Alton Cobb, Senior Housing Counselor [jim.manning@palss.org](mailto:jim.manning@palss.org)

- Providing case management services to clients residing in the counties of Richland and Lexington.

Upper Savannah Care Services, Inc. 864-229-9029  
Tiasha Bush, Director-Case Management [taishabush@uppersavannahcare.org](mailto:taishabush@uppersavannahcare.org)

- Providing case management services to clients residing in Saluda County.

#### **Short-Term Emergency Housing Assistance**

The Cooperative Ministry 803-799-3853 ext. 3013  
Wanda Pearson, Strategy & Impacts Officer [wpearson@coopmin.org](mailto:wpearson@coopmin.org)

- Providing short-term emergency rent, mortgage, and utility assistance payments for clients in Richland, Lexington, Fairfield, and Kershaw counties.

Upper Savannah Care Services 864-229-9029  
Tiasha Bush, Director of Case Management [taishabush@uppersavannahcare.org](mailto:taishabush@uppersavannahcare.org)

- Providing short-term emergency rent, mortgage, and utility assistance payments for clients residing in Saluda County.

University of South Carolina Dept. of Medicine 803-343-3437  
Kristen Connors, Dir. of Case Management Services, [kristenConnors@uscmed.sc.edu](mailto:kristenConnors@uscmed.sc.edu)

- Providing short-term emergency rent, mortgage, and utility assistance payments clients residing in the counties of Richland, Lexington, Kershaw, and Fairfield.

#### **Tenant-Based Rental Assistance Vouchers**

The Columbia Housing Authority 803-254-3886 ext. 208  
Nancy Stoudenmire, HR Director [nstoudenmire@chasc.org](mailto:nstoudenmire@chasc.org)

- Providing voucher assistance to clients and homeless individuals/families residing in Richland and Lexington Counties.

#### **Permanent Supportive Housing**

The Columbia Housing Authority 803-254-3886  
Nancy Stoudenmire, Dir. Human Resources [nstoudenmire@chasc.org](mailto:nstoudenmire@chasc.org)

- Acquisition and rehabilitation for 5 units of permanent HOPWA units located in Richland County.

## SECTION 4

### **HOPWA Funding & Grant Administration Process**

All City of Columbia HOPWA Grant awards are made through a competitive application process based on client needs, gaps in services, and ability of agency to successfully implement the program. The City HOPWA funding process for all categories of eligible activities, excluding special development programs focusing on permanent housing, opens in the fall for the fiscal year funding beginning the following July 1<sup>st</sup>. Requests For Applications (RFA) are announced in local print media, the City's website ([www.columbiasc.net](http://www.columbiasc.net)), announcements at community meetings focused on housing and HIV/AIDS care providers, announcements directly to agencies currently receiving funding, and any other agencies or individuals who have expressed interest in HOPWA programs. Applicants are asked to submit proposals in a designated format and by deadline, which is determined yearly. All budget line items must correspond to an eligible HOPWA activity as described in 574.300. The City expects all funding requests to be of high quality, demonstrate financial reasonableness (i.e. only containing essential items for providing services), and to adequately fulfill a gap in services related to housing.

FY 2015-2019 HOPWA funding priorities (in order of funding priority and does not reflect program administration costs):

1. Permanent Supportive Housing
2. Permanent Housing Vouchers
3. Emergency Housing Assistance
4. Supportive Services

### **Review Process**

City staff reviews applications and a community-based Advisory Committee reviews and gives input. Staff recommendations are made based on:

- agency past performance,
- client service needs and priority of those needs,
- funding availability, and
- agency's ability to effectively perform to City HOPWA standards.

Recommendations are made to the Columbia City Council by the Citizens Advisory Committee. Applicants are strongly cautioned against contacting any member of the Advisory Committee, City staff not designated to answer questions regarding the application, or City Council prior to funding awards. Applicants disregarding this provision will not be considered during the review process. Applicants may contact the City designated representative for technical assistance questions during the funding process. Award announcements are made in the spring for contracts for beginning July 1<sup>st</sup> and ending June 30<sup>th</sup> of that calendar year.

With the exception of special funding releases for permanent housing projects, the HOPWA funding cycle does not consider applications outside of the normal processing period. All funding award decisions are final.

For currently HOPWA funded recipients, requests for budgetary increases over prior year funding are only permissible if a substantial increase in performance or client services is clearly demonstrated, needed in the community, and funding is available. If City HOPWA entitlements funding is projected to be reduced, project sponsors may be asked to limit or reduce budget requests for the next fiscal year in accordance with the reduced amount of funding or an amount as determined through performance of the previous year and/or a combination of these two factors. The City reserves the right to negotiate, delete, or change any budget line item amount not found to have substantial supporting documentation or due to funding limitations.

City HOPWA awards are for one year; however, permanent housing or voucher programs may be awarded contracts with longer time periods. At the expiration of the agency's contract all unexpended funds revert to the City's general pool of HOPWA funds to be used for future HOPWA projects.

All requests for salaries will be approved based on the pro-rated amount of eligible housing services provided to Columbia EMSA clients. No employee shall be paid 100% FTE by City HOPWA, unless adequate documentation is provided to demonstrate the activities of that individual being solely dedicated to Columbia EMSA HOPWA clients. Applicant shall supply job descriptions for each position that City HOPWA is requested to fund. The City reserves the right to ask for additional supporting documentation. All employees whose salaries are paid via HOPWA must demonstrate that supportive services can be linked to housing. Once salary amounts and pro-rated percentages are approved, the agency may not make any changes to these line item amounts unless under what is deemed emergency conditions with substantial supporting documentation and then no more than a 10% line item difference may be approved by City staff. If a position becomes vacant during the fiscal year, City staff must be notified in writing within 10 working days. Salary adjustments for the employee filling that vacant position will be considered on the following basis: if the new employee salary will be no more than 10% lower or higher than the previous amount, then the agency and City staff may work together to review contract line items for possible adjustments.

Agency facility rental and utilities are reimbursable only on a pro-rated percentage based on the percentage of the agency staff providing direct HOPWA client services. The percentage of the facility costs for the administrative personnel may be charge on a pro-rated based against the administrative category of the grant.

Agency communication devices such as cell phones and telephones service are reimbursable on a pro-rated percentage based on the staff time worked with HOPWA clients.

The City does not pay for the reimbursement of agency late or collection fees or any fee associated with the non-return or damage to property.

The City does not pay for the costs of donations or contributions to fundraising efforts including expenses such as: printing and copying, postage, consultant fees, advertising costs, and staff time. Please note that staff time devoted to fundraising activities should be deducted from City HOPWA reimbursement requests.

If equipment is purchased under the HOPWA grant, appropriate records including serial numbers and the staff assigned to utilize the equipment should be maintained for four years and is subject to review by City staff. Only authorized agency staff performing HOPWA client services may utilize equipment, unless the costs of the equipment are appropriately allocated among grant sources, etc.

City staff conducts monitoring reviews on an annual basis that can consist of (On-site, remote, or desk) or as deemed necessary depending on the agency's performance and/or risk analysis. Topics may include, but are not limited to: internal financial controls, case manager protocols, HOPWA eligibility of clients served, review of case manager client files, review of client ISP and Housing Plan, review of compliance with all STRMU, TBRA, other HOPWA regulations, OMB circulars, and City program polices.

The agency may also be monitored by the U.S. Department of Housing and Urban Development.

The City requires the submission of one Semi-Annual and one Annual report. Copies of these reports can be found in Section 10 of this Handbook. Please refer to the following submission dates:

Semi-Annual report for July 1- December 31: **Due by January 15<sup>th</sup>**  
Annual Report for the time period of July 1 - June 30: **Due by July 30<sup>th</sup>**

**However, if your agency is placed on probationary funding status, you will be required to complete quarterly, not semi-annual reports.**

Additionally, all HOPWA funded agencies may be required to make an annual presentation as part of the City's Performance Hearing with the Citizens Advisory Committee for Community Development. This Public Hearing is generally held between August and November each year.

Records should be maintained for a minimum of four years from the end of the grant closeout.

Agencies should maintain client confidentiality. Release forms should be present in the file of each client receiving HOPWA services. This release should include HUD and the City as authorized to parties to share client information. This release should be updated annually.

**Client grievance procedure:** For cases when a client is denied housing or other HOPWA services, the agency must be able to provide in writing to the client the reason for the denial. If the client would like the case reviewed, the case manager or payment agency representative would refer the client to their immediate supervisor for

assistance. If additional procedures are in place within the agency, these procedures should also be followed. If the agency would like the case reviewed by the City of Columbia, a written request with all supporting documentation must be hand-delivered to the Community Development Department, 1225 Lady Street, Suite 102, Columbia, SC 29213 or mailed to Community Development Department, P.O. Box 147, Columbia, SC 29217. Please mark all envelopes as confidential. A written response will be directed to the requesting agency. Please do not directly refer a client to the City of Columbia or give contact information for City staff unless the City has been notified prior with details of the client's situation.

The agency may contact the City of Columbia for clarification of HOPWA regulations, client eligibility, or other procedural questions. All requests must be made in writing to [Comdev@columbiasc.net](mailto:Comdev@columbiasc.net) or by fax at (803) 988-8014 or P.O. Box 147, Columbia, SC 29213. A written response will be directed to the requesting agency.

All HOPWA funded agencies must have in place a method to determine client satisfaction with services. The method may be in the agency's own format; however, results should be available to review by City staff.

Surviving family members are eligible to receive housing services for up to one year; however, it is strongly encourage transitioning surviving family members to non-HOPWA services within 60 days. If transitioning the surviving family members to other non-HOPWA funded services is not possible within 60 days, appropriate documentation of efforts to obtain services and circumstances should be maintained and available for review.

All City project sponsors must comply with all City and HUD regulations and policies, including, but not limited to: OMB circulars A-110, A-122, environmental review regulations, Davis Bacon Labor Standards, lead-based paint standards, and procurement. Agencies should refer to their professional services contracts for further details.

#### **Probationary Funding Status:**

If a HOPWA funded agency consistently performs below City standards and/or demonstrates weaknesses in financial controls, the agency may be placed on probationary funding status. Although the City allows agencies a probationary period to improve performance, please note that funding may be terminated at any time with a seven day written notice. At the end of the probationary time period, if the agency has not demonstrated significant improvement per the City's determination, the agency's existing contract will be terminated with a seven day written notice and the agency will be prohibited from applying for City HOPWA funds for a period of two fiscal years. It is considered extremely serious when an agency is placed on probationary funding status and the agency is expected to make significant changes to their operating procedures, quality of care, and financial controls in order to continue to receive funding.

#### **Client Eligibility**

There are two basic elements of HOPWA eligibility:

- Household has a least one person who has Acquired Immunodeficiency Syndrome (AIDS) or related diseases (Human Immunodeficiency Virus, that is, HIV infection). This includes households where the only eligible person is a minor. Medical verification of status is required.
- Total household income is less than 80% of the Area Median Income (AMI), as defined by HUD. HUD sets Median Income levels for communities across the country; these numbers vary significantly. This data can be found at <http://www.huduser.org/datasets/il.html>

All participant files must contain documentation that verifies the participants' eligibility to receive HOPWA assistance. Low-income people living with Human Immunodeficiency Virus (HIV) disease or an Acquired Immunodeficiency Syndrome (AIDS) diagnosis and their families are eligible to receive HOPWA assistance. Acceptable medical documentation of HIV status includes:

- A statement of HIV verification signed by a physician, certified health care worker, or HIV testing site representative;
- Social Security Administration records indicating the nature of a disability determination;
- Other relevant federal program records verifying HIV status.

## SECTION 5

## **Standards for Short-term Rent, Mortgage, & Utility (STRMU) Payments**

STRMU payments are designed to provide short-term emergency housing assistance to prevent homelessness. (Refer to HOPWA STRMU Assistance Manual, November 2015)

### **What can and cannot be paid?**

- ✓ Does not provide first month's rent or security deposits
- ✓ Rent, mortgage, and utility assistance to prevent homelessness limited to 21-weeks in a 52-week period.
- ✓ Weeks of assistance do not have to be consecutive.
- ✓ Late fees for rent, mortgage, and utility payments may be paid as long as the time period does not overlap the 21-week eligibility period and clearly is used to prevent homelessness.
- ✓ Payments cannot be made to any HUD subsidized unit.
- ✓ The City does not approve STRMU payments based on a lease from a relative or family member.
- ✓ Assistance is paid to a third party (i.e. mortgage or utility company, etc.). No payments are made directly to clients.

### **Eligibility**

- ✓ Client must be living with HIV/AIDS, reside in the Columbia EMSA, be low-income (80% median or below) as according to the most recent HUD guidelines, have a quality housing plan and demonstrate progress and attempts to follow plan, demonstrate financial need, have an emergency situation, and the assistance will be to prevent homelessness.
- ✓ If a client is new to case management services, as with existing clients, a quality housing plan must be in place before HOPWA assistance may be requested.
- ✓ Clients should never be informed that they are automatically eligible for 21 weeks of assistance. Each request for assistance is considered separately and based on documented eligibility, need, and an emergency situation.
- ✓ 52-week period begins with the due date of the first assistance payment. For cases of utility assistance, the original due date of the bill begins the time calculation of the 21 weeks. For example, Example, first-time STRMU client with a utility bill for Mid-December thru Mid-January that was originally due on January 23rd. The client presented the utility bill for assistance on March 13th. In this example, seven weeks of assistance is requested. This calculation only applies to utility assistance. Rental and mortgage assistance is calculated on the due date and time period covered.
- ✓ Clients should seek assistance with other financial agencies prior to requesting HOPWA assistance. Case managers should document attempts to utilize other funding sources in the HOPWA request.
- ✓ For clients with no income, the case manager should strongly consider if STRMU is the best program for the client. In cases of no income, the client must sign a no-income verification statement. The case manager & STRMU agency must make an effort to determine how the client pays for everyday basic needs (food, clothing, etc.) to verify that no sources of income are present. Clear documentation of this must be present in the client's file and included with the HOPWA assistance application for the client to be eligible.

- ✓ Client must demonstrate financial need and an emergency situation
- ✓ Tenant must be listed on a valid lease; the owner of mortgaged real estate, or has an account in their name with a utility company. If the client is not listed on the utility bill: if the client is listed on the lease, the other leasee may provide a written statement that the person is responsible for the bill.
- ✓ Clients may be enrolled in case management services with multiple providers of his/her choosing. However, HOPWA financial assistance should only requested by the client's primary case management agency. The client will be asked to complete the 'Statement of Financial Assistance' form prior to any requests for HOPWA financial assistance. This form indicates the client's choice of a primary case management agency. Only the primary CM agency may complete HOPWA assistance applications.
- ✓ The client will be required to notify the primary case manager of all persons living in the dwelling, status of that person (ex. Roommate or family member) and all sources of income for family members.

### **Proof of Need**

- ✓ Documentation must be maintained on evidence of client need and satisfactory proof of tenancy. HOPWA is not an entitlement program. Clients who are within the 21-week eligibility period may be denied a payment by the case manager or STRMU payment agency if the client is not adhering to their Housing Plan, does not demonstrate financial need, and the assistance will not prevent homelessness. Proof of adherence should be documented.
- ✓ Items that do not demonstrate financial need include: jewelry purchases, non-essential clothing purchases, cable TV, cell phone or pager payments, personal loans for expenses not directly related to an emergency (ex. loan for car repairs would be acceptable) etc... If in doubt if a client's expenses constitute need, contact City staff via email at Comdev@columbiasc.net or by fax at 988-8014. Requests must be in writing.

### **Prevention of Homelessness**

- ✓ STRMU assistance must clearly be to prevent homelessness. Evidence of homeless prevent could include:
  - Late or shut off notice for utilities
  - Eviction or foreclosure notice
  - Third party verification (other than a relative) that client will otherwise be homeless if assistance is not received, if a late notice is not available at time of request.

### **Use of Other Community Resources**

- ✓ **All other sources of assistance must be investigated and/or utilized prior to requesting STRMU assistance**
- ✓ STRMU applications should not be processed without documentation that other community resources have been investigated and/or utilized.

### **What must the case manager/payment agency keep on file?**

- ✓ Agency must clearly track 21-week period in client file.
- ✓ Fair Market Rent Standards of rent reasonableness apply based on the number of bedrooms in the unit. Efforts should be made to secure client placement into

affordable permanent housing or assistance should be provided in financial management.

- ✓ A valid lease is required with the following information:
  1. Name of tenant and any other persons residing in the unit
  2. Signed and dated by landlord and tenant
  3. Provides a start and end date of the lease agreement
  4. States the address of the property and rental and deposit amount
  5. States any additional fees required by the tenant
  6. States if the deposit is refundable.
- ✓ Unless an established property management company, the application for deposit and first month's rent should contain verification of the property owner's name. Such verification could include a printout from the tax assessor's office. The property owner should be the same as the landlord listed on the lease that the deposit is paid to, unless a case of an established property management company.
- ✓ Case Manager or payment agency must document in file that verbal confirmation of tenancy was obtained with the landlord or mortgage company.
- ✓ Smoke detectors must be installed in units assisted. The STRMU agency will verify this and should provide a smoke detector, if needed.
- ✓ If a client is denied financial assistance, the agency should be able to provide in writing the reason for the denial, which should be based on the agency's written policy manual. Refer to 'client grievance procedures' in Section 4 for additional information.
- ✓ Housing plans must include how the client will avoid using STRMU in the future if this is a repeat request. Repeat STRMU requests are a clear indication that the client needs further case management follow-up and a STRMU application should not be processed without adequate documentation from the case manager that the client is making progress in their housing plan. If no progress is attempted by the client, the client is not eligible for HOPWA STRMU assistance for that particular request.
- ✓ Documentation must be maintained for the nature of the emergency for each payment requested in the client's file. Examples of emergencies may include: family's car needs repairs to be operational, expenses due to a hospital stay, loss of employment due to hospital stay or other documented medical reason. If a client loses employment for any reason, in order to be eligible for STRMU assistance, documentation must be in the file and included with the HOPWA assistance application of efforts to seek employment or medical documentation that the client is medically unable to work. If the client returns for an additional HOPWA STRMU request, the client must verify his/her efforts to obtain employment, unless medically documented unable to work, prior to submitting a HOPWA application.
- ✓ Documentation must be maintained for the actual amount of rent paid by the client. (Example: Client rents an apartment for \$500; however, has one roommate, making his actual rent \$250).
- ✓ The Case Manager should assist each client with the definition of a roommate and family member before the client declares the status of others living in the unit. Additionally, this same status must be utilized for future requests for assistance. All sources of family income are considered in HOPWA assistance applications.

- ✓ A signed HOPWA application must accompany each payment request. Along with a copy of the client's housing plan. Housing plans should be of high quality and detail client goals, adherence to the housing plan, and documentation of attempts to utilize other financial resources and efforts to obtain stable housing.
- ✓ For all clients, the agency must maintain a permission form to release information with the City of Columbia and HUD listed. This release should be updated annually.
- ✓ 1099 on all landlords paid

### **Additional Reminders**

- ✓ STRMU assistance is not intended to be on-going assistance from year to year.
- ✓ Agencies must make a good faith effort to place clients in permanent housing, ensure that STRMU assistance will prevent homelessness, and the client's current living situation is the most appropriate to prevent future homelessness.
- ✓ Time period waivers for STRMU payments should be sent in writing to the City of Columbia for review and may only be approved by the Assistant Secretary of HUD. Please note that this is a lengthy process and should not be utilized for cases of immanent eviction. Attempts to access all other sources of financial assistance must be thoroughly documented before sending a review request to the City.
- ✓ See HUD Notice CPD-02-09 dated November 3, 2002 (Copy found in this section) for further STRMU requirements.
- ✓ Payments may be made for up to 60 days during any six month period for short-term supported housing. Short-term supportive housing may include: a boarding house with a drug treatment program. A rental agreement (not necessary a lease) must be available. A short-term supportive housing program is defined as: Short-term facilities can house no more than 50 people. See 574.330 for additional information.

## **SECTION 6**

### **Standards for Tenant-Based Rental Assistance (TBRA)**

Tenant-based rental assistance provides permanent housing through vouchers (similar to Section 8) for eligible clients. Please note the following:

- ✓ Applicants must pay a portion of the rent (10% of gross income or 30% of adjusted income). Clients with no income should not be considered for tenant-based rental assistance programs since rental payments must be made.
- ✓ Rental amounts cannot exceed the Fair Market Rent for the area as published by HUD.
- ✓ Client must disclose all sources of income and all individuals living in the unit
- ✓ Income must be re-certified on an annual basis. Clients must be low-income as defined by the EMSA income criteria as published by HUD.
- ✓ Rental unit is chosen by client, but must pass a Habitability Quality Standards (HQS) inspection. Case managers should strongly caution clients not to move into prospective units until final approval has been given by CHA/FMHS.
- ✓ Rent cannot be paid on a HUD subsidized unit
- ✓ Clients must be enrolled in active case management with a City HOPWA funded agency. If a client leaves or is terminated from case management services, the HOPWA referring agency must notify the voucher administrator in writing within thirty (30) days. In turn, the voucher administrator must notify the client that he/she is no longer eligible for HOPWA voucher assistance, unless case management is resumed.
- ✓ STRMU payments cannot be used with a unit also assisted with a tenant-based HOPWA voucher.
- ✓ A lead based paint information page must be distributed if persons under the age of seven (7) reside in the unit. The brochure is available online at <http://www.hud.gov/offices/lead/outreach/leapame.pdf>
- ✓ Smoke detectors must be installed in units assisted. The voucher administrator will verify this.
- ✓ Voucher administrator will retain a copy of the lease. Lease must include: 1.) beginning date of the lease, 2.) signatures of the landlord and the applicant, 3.) amount of rent, 4.) number of persons in the unit, 5.) description of the property including the physical address (if the client is renting room of the house, lease must estimate what percentage of the property is being used by the applicant), 6.) Lease must include the landlord's taxpayer identification number. Voucher administering agencies are strongly encouraged to retain a signed copy of the landlord's 1099 on file.
- ✓ Proof of income must be maintained in the client file. At the time of the initial application, income verification can be no older than 1 month than the date of the application. Acceptable forms include a letter from SSA, check stubs, or a letter from the applicant's employer.
- ✓ All sources of income must be disclosed. Applicant must provide current bank statements for all accounts (checking, savings, certificates of deposit, etc.) to the voucher administrator.

### **Rent Calculation Steps**

1. Calculate gross and adjusted household income amounts.
2. Determine if a household is eligible for the Earned Income Disregard. If so, deduct disregarded income from total household income.

3. Determine which is highest: 10% of gross income, 30% of adjusted income or 'welfare rent.' This is the base rent payment for the household.
4. Calculate and apply an allowance for utility costs, if applicable, subtracting the allowance from the base rent payment.
5. This amount (which may be a negative number) is the final household portion of the rent.
6. Subtract the final household rent amount from the approved unit rent. This amount is the amount of monthly HOPWA assistance on behalf of the household.

Refer to Income and Resident Rent Calculation Worksheet (Attachment: 6-4 in *HOPWA Financial Management Training Manual, March 2012*)

### **Rental Property Inspection**

All housing assisted und 24CFR574.300(b)(3),(4),(5) and (8) including the HOPWA Rental Assistance Program, must provide safe and sanitary housing that is in compliance with the habitability standards, and any state and local requirements.

Each unit subsidized with HOPWA assistance must pass a housing quality inspection to ensure the housing provided is safe and sanitary and in compliance with local and state housing codes, licensing standards, and any other jurisdictional requirements, and the HOPWA program habitability standards as outlined in 24 CFR 574.310(b). Housing quality inspections are made at initial move-in and annually during the term of the rental assistance. Prior to occupancy by the HOPWA-funded tenant, the unit must be inspected and approved by the sponsor. The staff member performing the inspection need not have any special training, just familiarity with the HOPWA guidelines. The sponsor should use a checklist that covers the standards set out in the HOPWA regulations.

These standards are:

- ✓ Structure and materials: The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and to protect the residents from hazards.
- ✓ Access: The housing must be accessible and capable of being used without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
- ✓ Space and security: Each resident must be afforded adequate space and security for themselves and their belongings. An acceptable place to sleep must be provided for each resident.
- ✓ Interior air quality: Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
- ✓ Water supply: The water supply must be free from contamination at levels that threaten the health of individuals.

- ✓ Thermal environment: The housing must have adequate heating and/or cooling facilities in proper operating condition.
- ✓ Illumination and electricity: The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
- ✓ Food preparation and refuse disposal: All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
- ✓ Sanitary condition: The housing and any equipment must be maintained in sanitary condition.

***[See Attached HQS Habitability Standards Form]***

## **SECTION 7**

### **Standards for Housing Assistance Administration**

Administering housing assistance under the HOPWA program requires the completion of the following steps:

1. Income verification and subsidy calculation
  - All HOPWA beneficiaries must be income eligible (family household income below 80% of AMI).
  - Incomes must be verified annually.

- Clients receiving tenant based rental assistance, project based rental assistance, or living in a unit leased by a sponsor or a facility supported by HOPWA operating funding must pay rent.
  - ✓ Rent is determined to be the greatest of 30% of adjusted income or 10% of gross income.
- The HUD regulation for income verification and subsidy calculation of HOPWA are the Part 5 Requirements.
  - ✓ HUD has an online tool that provides a step-by-step guide to determine income and rent subsidies. This tool can be accessed at [www.hud.gov/offices/cpd/affordablehousing/training/web/calculator.cfm](http://www.hud.gov/offices/cpd/affordablehousing/training/web/calculator.cfm)
- See 24 CFR 574.310.

## 2. Maximum

### **Standards for Supportive Services**

- ✓ All agency salaries paid must be linked to employee's duties related to housing. If case managers are not working directly with clients on HOPWA assistance applications, housing placement, and housing plan creation and adherence, those salaries should not be billed to City HOPWA.
- ✓ For all clients, the agency must maintain a permission form to release confidentiality statement with the City of Columbia and HUD listed. This release should be updated annually.
- ✓ **Case Management as Supportive Services:**
  - HIV status must be documented in all files. Acceptable methods of documentation are: western blot test results, viral load results, letter from a physician, or a letter from a nurse practitioner.
  - Individualized Service Plan (ISP), which includes a Housing Care Plan. Plans should include a prioritization of problems, goals, and steps to work toward goals. ISP should include plan to move client into permanent housing. The case manager and client should sign the ISP. Documentation of goals and adherence to the housing plan should be maintained in the client file and submitted with any HOPWA application for financial assistance. HOPWA applications for financial assistance (STRMU & TBRA) should not be submitted if the client is not adhering to the agreed upon housing plan and ISP.
  - Updates to entire ISP/Housing Plan are required at least annually. However, Housing Plan should be reviewed with client with every request for emergency assistance or quarterly (which ever is less). If the client has not requested assistance with housing services in the last 90 days, documentation of verbal contact is acceptable to update the client's housing plan if a low-level needs client.
  - All client files should be secured in a locked filing cabinet within a locked room during non-working hours. Additionally, case managers should be cautious in protecting client identity with additional measures such as not stating the client's name over a telephone line, unless it is behind closed doors and not leaving client files in visible places on the case manager's desk.

- HOPWA funds should be used only to assist HOPWA-eligible clients residing in the Columbia EMSA (i.e. documented to have HIV or AIDS **AND** to be low income, which is defined as 80% or below the Area Median Income as defined by HUD). All services offered to assist clients in maintaining housing (food pantry, drug treatment assistance) should be provided to HOPWA eligible clients only.
  - All case Managers funded through HOPWA should assist clients with housing placement, completing HOPWA applications, and housing information.
- ✓ **Payment of Deposits and First Month's Rent as Permanent Housing Placement (Supportive Services)**
1. A signed application must accompany each application. The application should clearly state at the top that the request is for deposit and first month's rent rather than STRMU.
  2. Client must demonstrate how they will pay for recurring expenses such as rent and utilities.
  3. Verified income documented.
  4. Not eligible with NO INCOME or without sufficient income for reoccurring expenses (rent, utilities, and basic living expenses).
  5. Budget required (income must cover monthly household expenses with surplus to cover additional utility charges and emergencies).
  6. No repeated applications accepted for deposit or first months rent in a 2-year time period. Any subsequent request after the two-year period will be evaluated as to why repeated assistance is needed with documentation.
  7. For deposits and first month's rent, the client must have been enrolled in active case management for at least 30 days with a complete intake and quality case plan. Case plan should document how the client will maintain permanent housing.
  8. NO deposits for first month's rent paid to boarding houses, family members, or transitional housing.
  9. Not valid for the purchase of property or land.
  10. Number of weeks will be included in the STRMU 21 weeks limited in a 52-week period if subsequent STRMU assistance is requested within the 52week period including the deposit assistance.
  11. If living with a roommate(s), only the percentage of the client's portion can be paid (example – a client with two roommates would mean 33% of the deposit and first month's rent can be paid). Use the STRMU guidelines for cases involving family members.
  12. Security deposit and first month's rent paid must be at or below the HUD fair market rent allowed for the area. FMR value for the purposes of security deposit and first month's rent payments is determined by the number of persons – not the number of bedrooms of the prospective unit. For example, a single person moving into a three-bedroom apartment would be eligible for the one bedroom FMR value for deposit and first month's rent.
  13. Security deposits must be refundable with the agency's information provided for the return of the deposit.
  14. A valid lease is required with the following information:
    - a. Name of tenant and any other persons residing in the unit
    - b. Signed and dated by landlord and tenant

- c. Provides a start and end date of the lease agreement
  - d. States the address of the property and rental and deposit amount
  - e. States any additional fees required by the tenant
  - f. States if the deposit is refundable. If refundable, must state the HOPWA agency's address for the funds to be refunded to at the conclusion of the lease.
- City HOPWA may pay reasonable housing placement fees such as credit checks and application fees with appropriate documentation. However, City HOPWA may not pay deposits on furniture, appliances, etc...
  - Unless an established property management company, the application for deposit and first month's rent should contain verification of the property owner's name. Such verification could include a printout from the tax assessor's office. The property owner should be the same as the landlord listed on the lease that the deposit is paid to, unless a case of an established property management company.
  - HOPWA should not be revealed as the source of payment.
  - On the City's semi-annual and annual report, deposits and first month's rent must be listed separately from STRMU payments and included in the supportive services section under 'permanent housing placement'.
  - When placing a client into permanent housing, the case manager should assist the client in determining that the unit is affordable and meets basic livability standards such as: working plumbing, central heat, stove and refrigerator in the unit, access to transportation, and is not unsafe to live in.
  - Clients should never be moved into a unit with the expectation of automatically utilizing STRMU assistance for payment of rent or utilities. See STRMU section of Handbook for further details.

## SECTION 8

### Standards for Property Acquisition & Rehabilitation

HOPWA funds may be utilized for property acquisition and rehabilitation under the following provisions:

- ✓ Property acquired or rehabilitated with HOPWA funds must be dedicated low-income to persons living with HIV/AIDS with access to appropriate supportive services for a period of at least ten years.
- ✓ The City would expect agencies to pay for closing and soft costs such as: realtor commissions, attorney fees, appraisal fees, heating/air letter fees, termite inspections and bonds, title search and insurance, property taxes, hazard insurance, etc... with non-HOPWA sources to demonstrate in-kind resources.

- ✓ Agencies must assure that they have taken all reasonable steps to minimize the displacement of persons as a result of a project assisted with HOPWA funds. Agencies must comply with the standards of the Uniform Relocation Act of 1970 and regulations 49 CFR part 24. Relocation requirements are triggered when an agency places an option or contract on a prospective property that is currently inhabited.
- ✓ Agencies must comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), implementing regulations at part 35, subparts A, B, H, J, K, M, and R. Lead-based paint removal must be completed by an EPA certified contractor.
- ✓ Property in a flood hazard identified by FEMA cannot be purchased with HOPWA funds.
- ✓ Appropriate building permits must be obtained prior to rehabilitation and the agency and contractor must comply with all local ordinances and standards for work performed.
- ✓ The agency must bid for contractor services greater than \$500 with two documented verbal or written comparable bids or quotes, expenses greater than \$5,000 require three written comparable bids/quotes. Include copies of these bids/quotes with the reimbursement request or written documentation of verbal quotes.
- ✓ The City reserves the right to visit, inspect, and approve prior the purchase property acquired or rehabilitated with HOPWA funds.
- ✓ The City reserves the right to visit, inspect, and approve rehabilitation standards for property acquired with HOPWA funds, yet rehabilitated solely with non-HOPWA.
- ✓ New construction may be single room occupancy (SRO) or community residences only.
- ✓ The following minimal City standards apply to rehabilitation (whether HOPWA funds the acquisition or rehab). Please note that all standards are required unless noted as 'preferred':

#### **Demolition**

- Demolition work shall be completed according to contract.
- All debris shall be removed from premises on a weekly basis. Exception: if debris is contained inside a commercial grade trash container, a dump truck, a trailer, or some other type of vehicle or container that is being used specifically for debris removal, the debris may remain on premises until such vehicle or container is filled to a reasonable capacity at which time it shall be removed from premises.
- All debris shall be taken to an approved landfill as determined by The South Carolina Department of Health and Environmental Control Agency (D.H.E.C.).

#### **Foundation:**

- Shall be structurally sound.
- All deteriorated and/or over spanned building components shall be replaced and/or properly supported respectively.

- The City of Columbia reserves the right to require an inspection be performed by a licensed structural engineer registered to practice in South Carolina to determine if component in question is indeed structurally sound.
- All foundation vents shall be screened and also designed / located to prevent water from entering the crawl space.
- All crawl spaces shall have adequate ventilation.
- Structure shall be treated for subterranean termites by a state licensed exterminator who upon completion of treatment shall issue an “Official South Carolina Wood Infestation Report” showing that structure is free-and-clear of infestation or damage caused by any wood destroying insects or fungi. Structures that have been treated within the last five years by a state licensed exterminator may be exempt from re-treatment provided that documents are forwarded to the City confirming such treatment. In no case shall wood products come in contact with grade under a structure.
- Piers shall be permanent masonry units with poured concrete footings. Existing structurally sound masonry piers may remain in place.
- Stacked masonry units, wooden piers, and metal jacks are prohibited for use as piers.
- Accessory doors/ windows located below main level of structure and all sub-flooring shall be considered part of the foundation.

#### **Yard:**

- Residences must have a minimum of two off street parking spaces, preferably paved, but gravel, mulch, and pine straw comply with City Ordinances.
- Excessively damaged paved walks and drives must be restored to like new condition.
- Necessary measures shall be taken to drain water away from structures and to keep lot from eroding. In no case shall water be diverted into adjacent property nor directly into City right-of-way.
- All large holes and cavities [unused septic tanks, oil tanks, washouts, etc...] shall be backfilled / compacted with fill dirt.
- All tree limbs within six feet of structure shall be cut.
- Any tree located where root system is undermining structure shall be permanently removed from site including stump.

#### **Siding:**

- Moisture and/or termite damaged exterior wood products and any defective [split, large knot holes, etc...] exterior wood products shall be replaced with material to match remaining wood products.
- All other types of siding materials [brick, block, vinyl, aluminum, etc...] shall be in like new condition. This shall include cleaning, caulking, and, where applicable, “pointing up” of mortar joints so as to acquire an acceptable finished product.

#### **Porches & Steps:**

- Porch and step components shall be structurally sound.

- All components shall be in like new condition to include replacement of any missing materials.
- All wood products used in floor system shall be treated material.

#### **Windows:**

- Windows must operate as originally designed to operate, must be free of defects [cracked glass, brittle spackling, defective hardware, etc...]. It is preferred that insulated glass or be used in conjunction with storm windows.
- If screens are present they must be in like new condition.
- If shutters are present they must be free of defects and must be properly secured to structure.

#### **Exterior Doors:**

- Exterior doors must operate as originally designed to operate, must be free of defects [cracked glass, brittle spackling, defective hardware, splits in wood, etc...]. It is preferred that door be air tight, and must be insulated or be used in conjunction with storm doors.
- If storm door is present it must include a pneumatic closure and a latch.

#### **Roof:**

- Roof system must be free of leaks, must be structurally sound, must be clear of any foreign matter atop roof, must have an effective life /wear expectancy of five years, and must provide adequate attic ventilation.
- If attic vents are present, they must be screened with a maximum of 1/8" sieve size wire mesh.
- Gutters are not recommended for use, but when present must be functioning properly and must include splashguards at downspouts.

#### **Electrical:**

- Electrical system must be functioning properly.
- All wiring must be insulated and the insulating material must be in good condition.
- All bedrooms and hallways must have electric with battery backup interconnected smoke detectors.
- All outlets in kitchen, baths, and any other room containing a source of water must be ground fault protected per the most current issue of "The National Electric Code".
- Three prong outlets shall not be used with non-grounded wiring.
- All splicing must take place inside a junction box and include caps and tape.
- Any bathroom without an operable window must include an exhaust fan vented to outside of structure.
- Fixtures must be free of defects and include all parts as originally manufactured for use.

#### **Plumbing:**

- Supply and drain lines must be in good condition and functioning properly for the distribution of water and for the removal of all waste from premises.
- Structure must be connected to the City's water and sewer system. [In the event that City water and / or sewer is not available to property, structure must be connected to a system approved by D.H.E.C..]
- Fixtures must function properly, be secured to structure, and be free of any defects [chipped enamel, rust, cracks, leaks, etc...].
- Existing tub/shower surrounds and pans must be in good condition and must be watertight.
- Water heaters must be functioning properly, must be installed per new construction building code, and must be free of notable rust-through on housing units. All water heater units located outside of heated space must be insulated to an "R-8" value and be elevated to a level of at least four inches above adjacent grade.
- Dryer venting must meet new construction building code.

#### **Heating & Air Conditioning:**

- All structures must contain a central heating that on a year-round basis is capable of maintaining a temperature of sixty-eight degrees. It is preferred to also have a central air conditioning unit.
- Fahrenheit [at a level of three feet above the floor level] in all habitable rooms.
- Existing systems shall be inspected and serviced by a licensed heating and air technician who upon completion shall provide a certification letter to the City indicating that the system is in good condition and that the system meets the aforementioned minimum requirements.
- It is preferred that new systems shall have a minimum AFUE rating of 80% for gas units and 90% for electric units, shall have a minimum SEER rating of 12, and shall include ductwork insulated to a minimum "R- 6.5" value. [Installer shall provide a certification letter to the City indicating that the system meets the aforementioned minimum requirements.]

#### **Interior Walls & Ceilings:**

- All interior walls and ceilings must be structurally sound, free of all defects, and "finished out" in a uniform manner that is widely accepted as a standard method of building construction.
- Defects shall include but not be limited to; cracks, nail "pops", buckling of material, materials not bonding, torn wallpaper, holes, exposed framing, delaminated material, notable uneven surfaces, and other defects that give the appearance of an unfinished product.
- Defective plaster walls covered with wallpaper is not an acceptable method of wall finish; textured ceilings with obvious "patching" is not an acceptable method of ceiling finish.

#### **Insulation:**

- It is preferred that all areas shall be insulated to meet the following "R" values. [Existing wall areas not exposed during construction shall only be

insulated at agency's discretion.]. Ceilings: R-30, Walls: R-13, Floors: R-19.

**Fireplace:**

- All chimneys shall be structurally sound and in safe working condition as determined by a licensed chimney inspector.
- All fireplaces shall have tight fitting dampers.
- Chimney inspector shall furnish a letter of certification to the City stating that each chimney / fireplace is in good condition and that no repairs are recommended at this time.
- Chimneys not meeting these requirements shall be permanently sealed at all openings.

**Interior Trim:**

- All defective [split, rotten, missing, dented, or otherwise damaged] trim shall be repaired and/or replaced with a material that matches the remainder of trim in each respective room.
- All door and window hardware shall function properly and any missing hardware shall be installed to bring door and window back to like new condition.
- Bedroom and bathroom doors shall include privacy latches.

**Kitchen:**

- All cabinets shall be in good working order and finished in a like new condition.
- Cabinets and countertops shall be free of water damage or surface defects.
- There shall be a minimum of 24 c.f. of wall cabinet storage and 40 c.f. of base cabinet storage in each kitchen. [Pantry cabinet or closet may be included as storage space when calculating space requirements.]

**Bathroom:**

- All bathrooms shall include at least one each of the following items: mirror, towel bar, tissue holder, shower rod (where applicable), and storage cabinet [medicine cabinet, vanity cabinet, etc...].
- Existing fixtures shall be in like new condition.
- Vanity tops shall be secured to cabinet and sealed at all edges to prevent water infiltration.
- Tub and shower surrounds shall be watertight and in like new condition.

**Floors:**

- All sub-flooring shall be structurally sound.
- Particleboard sub-flooring shall never be used as a sub-floor replacement within a distance of four feet of any water source. [This includes supply lines inside wall cavities but does not include supply lines underneath floor level.]
- All finished floors must be free of defects [splits, cracks, voids, worn or torn areas, delaminated areas, exposed edges, etc...].

- Finish flooring material shall be a product that is widely used in the construction industry for such an application [hardwood, carpet, vinyl, tile, etc...]
- Newly installed carpet shall be a minimum 34 oz. FHA approved carpet with a minimum ½” padding. Padding must meet or exceed Federal VM 44 specifications.
- Newly installed vinyl flooring must conform to Federal specifications and be a grade “C” or better and be installed per manufacturers’ specifications.
- All new flooring must be installed in a manner consistent with methods widely used in the construction industry.
- Painted floors are not acceptable unless pre-approved by City staff.

**Painting:**

- All interior and exterior painted surfaces must be free-and-clear of any defects [chipped, cracked, brittle, or peeling paint, “surface marks”, etc...].
- All window glazing must be in like new condition.
- All open seams or joints must be caulked and / or filled consistent with methods widely used in the construction industry.

**Appliances:**

- All habitable structures shall include a kitchen area equipped with a minimum 16 cubic foot refrigerator and a stove / oven.
- A stove hood must be installed above any appliance designed for surface cooking when cabinetry is located above this appliance.
- Appliances must be clean and in working condition.
- Appliances must not exhibit any signs of “finish” deterioration [rust, flaking paint, etc...].

**Miscellaneous:**

- Certain items are considered non-essential such as: fencing, garages, out buildings, patios, hot tubs, swimming pools, ceramic tile, security systems, fireplaces, decks, stained glass windows, marble tops, etc... is not be reimbursable with HOPWA funds.

**Agency Checklist for Property Acquisition**

*What happens when an agency identifies a property?*

- ✓ Check with City or County zoning office to ensure that property has residential zoning classification.
- ✓ Fax a copy of the contract to the CD Dep’t at 988-8014
  - Contract should have a closing date of at least 60 days (90 days is preferred)
  - Contract should contain a clause stating that the property purchase is contingent upon approval of the City’s Community Development Dep’t.
  - A statement indicating the property’s current zoning (ex. RS-1, RS-2, M-1)
  - A statement that the property is vacant at the time of the option/offer/contract
- ✓ Schedule an inspection and write-up

- ✓ Agency faxes or emails detailed write-up of the property condition and all anticipated rehab to 988-8014
- ✓ City reviews the write-up and performs inspection to ensure that all necessary repairs are covered.
- ✓ City sends notice to agency of the approval or rejection of the property
- ✓ Agency must prepare a Restrictive Covenant for property
- ✓ Agency schedules an appraisal, survey, termite inspection, and heat/air inspection (if unit will not be replaced). Agency selects a closing attorney and sets a closing date
  
- ✓ **24-hours prior to closing, the following info should be provided to the City**
  - Preliminary HUD-1 Settlement Statement
  - Copy of survey (no older than 10 years IF there is no cloud on the title)
  - Copy of appraisal (no older than 6 months)
  - Copy of title binder (Schedules A & B)
  - Copy of the hazard insurance policy showing the City as insured
  - Copy of the Note for the Mortgage
  - Copy of the Mortgage
  - Copy of the Restrictive Covenant
  - Copy of the Wood Infestation letter (Note – all necessary repairs must be included in the proposed rehab)
  - Copy of the Note for the Mortgage
  
- ✓ **7 days after closing, deliver the following:**
  - Original executed Note for Mortgage
  - “Clocked in” copy of the executed Mortgage
  - “Clocked in” copy of the executed Mortgage Rider
  - Original signed and dated Truth-in-Lending for Mortgage
  - Original signed and dated HUD-1 Settlement Statement
  - Original signed and dated Restrictive Covenant
  - Copy of one year prepaid hazard insurance policy
  
- ✓ **45 days after closing, deliver the following:**
  - Original recorded Mortgage
  - Original recorded Mortgage Rider
  - Original recorded Restrictive Covenant
  - Copy of signed, clear Wood Infestation Letter (or at conclusion of rehab)

## SECTION 9

### Standards for Financial Management

HOPWA success depends on financial accountability. The City of Columbia requires each project sponsor and encourages each subrecipient organization to complete the *HOPWA Financial Management Online Training* available through a HOPWA link on the HUD Homelessness Resource Exchange, HUDHRE.info.

The overall financial management process provides HOPWA grantees an effective approach for developing proposed activities using sound financial information, accurately recording financial information to carry out the activities, and reporting all financial information in the format specified. Each element of the training modules below is a guideline for the overall financial management system.

The modules are summarized as follows:

- **Module 1: Introduction**

In addition to serving as an introduction to the training manual, this module provides an overview of the Federal regulations and circulars governing the financial management requirements to which all grantees and project sponsors must adhere. These requirements are elaborated on in Modules 2 and 3. This module also offers suggestions for policies and procedures for ensuring confidentiality, as many financial documents contain information about persons assisted under the HOPWA program that should remain confidential.

- **Module 2: Financial Management Standards**

This module describes the financial management standards under 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Guidance.

. These requirements address internal, budget, and accounting controls. Collectively, these controls are established through policies and procedures pertaining to staff with financial responsibilities; procedures for tracking, reporting on, and obtaining revisions for the budget; and requirements for accounting records and source documentation. This module also discusses procurement requirements.

- **Module 3: Cost Principles**

This module focuses on OMB requirements and industry standards related to costs — how they are classified, what is required to be reimbursable, and how they are allocated. The discussion on allocation addresses direct and indirect costs and provides essential information for the discussion of allocating personnel and non-personnel costs in Modules 4 and 5.

- **Module 4: Financial Management of Personnel Costs**

Personnel costs comprise primarily salaries and benefits. Reimbursement is based on time spent working with HOPWA-eligible clients and engaged in HOPWA-eligible activities. This module focuses on how to allocate personnel costs, particularly when staff works on activities funded by different sources, and what documentation to retain in the files. The latter half of this module has a section on budgeting personnel costs.

- **Module 5: Financial Management of Non-personnel Costs**

As in Module 4, this module focuses on whether and how to allocate non-personnel costs to the HOPWA grant, particularly when costs are shared across various funding sources. It also provides guidance on considering whether to seek reimbursements under the HOPWA grant for indirect costs.

- **Module 6: HOPWA Rental Assistance**

This module discusses the financial management requirements related to HOPWA rental subsidy payments. Throughout the module, a scenario about one 2-bedroom unit with a three-person household is used to illustrate the components of this financial transaction and highlight the documentation required to substantiate reimbursements.

- **Module 7: HOPWA Financial Reporting**

All grantees are required annually to submit performance reports to HUD. Formula grantees submit the Consolidated Annual Performance and Evaluation Report (CAPER); competitive grantees submit the Annual Progress Report (APR). This module identifies the financial data elements related to housing activities and other typical HOPWA activities.

- **Module 8: Auditing**

An agency or organization will periodically undergo an audit of its financial systems and controls. This module briefly describes basic information about what an audit is, typical audit findings, and the clearance of findings.

- **Module 9: Training and Oversight of Project Sponsors**

This module looks at the two sides of oversight — the training done by the grantee to aid project sponsors prior to the start of activities and the subsequent monitoring of activities. While remote and onsite monitoring is familiar to most grantees, less familiar perhaps is the collaborative approach that grantees can take with project sponsors in developing financial policies and procedures that will make it easier for them to achieve compliance.

*HOPWA Financial Management Training for HOPWA Grantees* and the *HOPWA Grantee Oversight Resource Guide* (See Section 13 of this Guidebook) provide grantees and project sponsors with an understanding of the various Federal laws and regulations that govern the use of HOPWA resources, while providing guidance and tools to conduct compliance reviews and identify corrective actions, as needed. See: [www.hudhre.info/hopwa](http://www.hudhre.info/hopwa). Under the “HOPWA Oversight and Monitoring” link,

## SECTION 10

### **Standards for Reimbursement Requests**

Please utilize the following guidelines for reimbursement requests for the City of Columbia's HOPWA program. Reimbursement requests take an average 15-30 working days to process once submitted in the correct format with all supporting documentation and containing only approved eligible items per the agency's City HOPWA contract. Please note that only expenditures from the approved HOPWA application and executed contract will be considered. Agencies must maintain an accurate account of all expenditures per their contract line items. Overages in contract line item categories are not permitted. All costs must be reasonable and necessary in nature per 2 CFR Part 200.

The City of Columbia does not provide advance payments for agencies providing STRMU, TBRA, or property acquisition.

#### **1. Reimbursement Cover Sheet – See Attached Sample**

- ✓ Cover Sheet provided by the City of Columbia (Must be used)
- ✓ Signed by the Agency Executive Director or Board Chair (or designated grant administrator authorized by Board to sign).
- ✓ Cover Sheet must be completely filled out.
- ✓ Specify the amount requested.
- ✓ Cover Sheet must include an original signature (no fax copies)
- ✓ Indicate the time period covered.

#### **2. Spreadsheet of total expenses.** A spreadsheet detailing total expenditures that correspond to receipts. The spreadsheet should be listed according to contract line item categories, such as:

##### Supportive services

XYZ CM for May 1-May 15	\$x.xx
XYZ CM for May 15-May 31	\$x.xx
Fringe for May 1-May 15 <sup>th</sup>	\$x.xx

##### Housing Information

Agency phones	\$x.xx	City HOPWA 25%, RW 75%
Agency cell phone	\$x.xx	City HOPWA 25%, RW 75%
Administration (No more than 7%)	\$x.xx	

#### **3. Timesheets**

For all positions where reimbursement for salaries is requested, timesheets must be submitted. Timesheets may be in your agency's own format; however, must include the following information:

- ✓ Employee's name and title.
- ✓ A daily record of hours worked on City HOPWA grant and all other grant sources for that position.
- ✓ Indicate what percentage of total salary if requested from City HOPWA funds and how this percentage relates to all other grant sources by name of grant source for that position (Ex. Total salary \$30,000 per year, RW 50%, XYZ grant 25%, City HOPWA 25%).
- ✓ The employee and supervisor should sign his/her timesheet.

#### **4. On-going expenses (e.g. facility rent)**

- ✓ Include a copy of the facility lease agreement at the beginning of the fiscal year or with any changes in location or terms of the agreement.
- ✓ Include an individual coversheet with each item OR include this information on the spreadsheet detailing all expenses along with the percentages of all other grant sources (\*\*NOTE\*\* the percentage billed cannot be greater than the amount approved in your HOPWA application).

#### **5. Purchases/monthly expenses**

- ✓ Include an individual coversheet for each purchase OR include this information on the spreadsheet detailing the percentage of the purchase amount requested from City HOPWA and the percentage of all other grant sources (\*\*NOTE\*\* percentages cannot exceed the amount approved in the City HOPWA application).
- ✓ Include a detailed copy of the complete invoice/bill.
- ✓ All expenses greater than \$500 requires two documented verbal or written comparable bids or quotes, expenses greater than \$5,000 require three written comparable bids/quotes. Include copies of these bids/quotes with the reimbursement request or written documentation of verbal quotes.
- ✓ For agencies on probationary status, include a copy of the signed check used for payment. If a credit card was used, include a paid receipt indicating this.

#### **6. Administrative Expenses (not to exceed 7% of the programmatic costs monthly)**

- ✓ All standards from above apply (timesheets, quotes, coversheets, etc).
- ✓ Full documentation must be provided on the amount requested.
- ✓ Items such as property taxes, facility rent and utilities for the portion of the building used by administrative staff, business and operating insurance, and professional audits may be included in this 7% administration category; however, proper documentation must be submitted for each (i.e. copy of the bids obtained, copy of the contract for services, etc.)
- ✓ If 7% threshold is exceeded in one month, it may be adjusted in another month with approval from City staff. Administrative costs cannot exceed 7% of total grant costs for grant period.
- ✓ All expenses greater than \$500 requires two documented verbal or written comparable bids or quotes, expenses greater than \$5,000 require three written comparable bids/quotes. Include copies of these bids/quotes with the reimbursement request or written documentation of verbal quotes.

#### **7. STRMU Payments**

- ✓ Do not include names or SSN information on clients. Identify clients by a system that can be clearly referenced during monitoring visits, such as client number, file number, etc.
- ✓ Include the address of the property assisted, amount, and type of assistance (ex. Utility bill, mortgage bill, or rent)

#### **8. Tenant-Based Rental Payments**

Include on a brief spreadsheet, the following information:

- ✓ Client number or voucher number (please do not include names or SSN)
- ✓ Amount of subsidy

- ✓ Amount of client's portion
- ✓ Addresses of units assisted
- ✓ Total of monthly subsidy requested
- ✓ How administrative fee is determined (not to exceed 7%)

## 9. Travel and training

All staff travel and training must be housing related. Unless otherwise authorized, only the costs of one staff person per travel event are eligible for reimbursement. All travel or training must be authorized by the City prior to registration or funds commitment for total expenditures greater than \$500. All costs should be of a reasonable nature and shared among additional grant sources, where appropriate. Please note that the City reserves the right to disallow any expenditure it deems not to be of a reasonable nature or not related to housing. Please include the following information with reimbursement requests:

- ✓ Attach a copy of the agenda for the training.
- ✓ Attach copies of all receipts (i.e. flight, hotel, registration fees, etc.).
- ✓ Reimbursement for travel is paid for HOPWA/housing training or meetings for travel greater than 100 miles from origination point (agency address), unless otherwise justified. However, staff travel for HOPWA client home visits is also acceptable, please document travel according.
- ✓ Travel mileage is calculated from the agency location to the destination. Please include a map quest print out of the mileage based on the agency address as the origination point.
- ✓ Mileage, hotel, and meal diem are paid based the federal rate found at: <http://www.gsa.gov/portal/category/21287>

## Section 11

### Standard for End of Year Close-outs

The City HOPWA program year ends on June 30<sup>th</sup>. Please note the following closeout procedures:

- ✓ The agency should plan to send a reimbursement request no later than the first ten business days of June for the period ending May. This is for HUD draw down and year-end reporting purposes.
- ✓ All final reimbursement requests for June expenditures must be submitted no later than the last working day in August. Previous year requests will not be accepted after this date.
- ✓ Only expenditures prior to June 30<sup>th</sup> will be accepted. Expenditures must be eligible, reasonable in nature, and within the line items of the agency's approved HOPWA contract.
- ✓ For expenditures, such as a utility bill, which may span a time period past June 30<sup>th</sup>, the agency should request only the prorated amount for the time period prior to June 30<sup>th</sup>. Detail the agency's calculation of the pro-rated amount on the request.
- ✓ If at the end of the program year the agency finds large amounts of unexpended funds in a contract line item, the agency may **not**:
  - Transfer amounts to different line items, without written permission from the City of Columbia;

- Use within same line item to increase salary of employees;
- Pre-pay for future expenses or make usually large purchases simply to spend down the funds.

Please keep in mind that all unexpended funds in expiring contracts will be utilized for future HOPWA grants, including the development of permanent housing.

## Section 12

### **HOPWA Reporting**

Each HOPWA Sponsor shall submit a Semi- and Annual CAPER report to the City of Columbia Community Development Department. Each report is due by the following reporting schedule:

Semi-annual CAPER due no later than January 15<sup>th</sup>  
Annual CAPER due no later than July 15th.

Each project sponsor is encouraged to utilize the HOPWA Consolidated Plan Annual Performance Report (CAPER) Training Modules which provide grantees and sponsors with a thorough review of every question in the HOPWA CAPER reports. The training is a PowerPoint presentation with audio narration. It can be viewed section-by-section or by selecting slides on specific topics. Grantees and sponsors will learn how to report accurate and complete information through viewing presentation-style discussions and participating in interactive exercises to test understanding. See HOPWA CAPER Training Module1-3: [www.onecpd.info/resource/1156/hopwa-caper-training-modules/](http://www.onecpd.info/resource/1156/hopwa-caper-training-modules/)

See HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) HUD-40110-D (**OMB Number 2506-0133 (Expiration Date: 10/31/2017)**)

## Section 13

### **Resources:**

- 24 Part CFR 574- Housing Opportunities for Persons with AIDS
- 2 CFR Part 200 OMB Super Circular
- HOPWA Grantee Oversight Resource Guide
- HUD Median Income Levels
- Fair Market Rent Values
- <https://www.hudexchange.info/resources/documents/HOPWA-Grantee-Impact-Tool.xlsx>

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