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Housing Opportunities for Persons with AIDS (HOPWA)

Sponsor Training
February 11, 2016

Introductions

- Cedar Valley Hospice (Waterloo)
- Nebraska Aids Project (Omaha, NE)
- Primary Health Care (Des Moines)
- Siouxland Community Health Center (Sioux City)
- The Project of the Quad Cities (Davenport/Moline, IL)
- University of Iowa (Iowa City)
- Institute for Community Alliances (Des Moines/Statewide)
- Iowa Finance Authority (Des Moines/Statewide)



Presenters

Amber Lewis, Homeless Programs Manager

Judy Hartman, Administrative Assistant

Josh McRoberts, Administrative Assistant

Institute for Community Alliances Staff

Iowa Finance Authority 101

IFA 101: History

- 1975 – Iowa Housing Finance Authority created
- 1980 – FTE = 8
- 1986 – Title Guaranty Division created
- 1987 – SRF created
- 1989 – FTE = 20
- 2000 – HUD Section 8 PBCA Awarded
- 2002 – FTE = 79

IFA 101: History

- 2004 – Several programs added
 - Senior Living Revolving Fund
 - Home & Community-Based Services Revolving Loan Fund
 - Home & Community-Based Rent Subsidy
 - Aftercare Rent Subsidy
- 2008 – Iowa Council on Homelessness codified
- 2010 – HOME program moves to IFA from IDED
- 2013 – Iowa Ag Development Authority becomes IADD at IFA

IFA 101: IFA Today

- \$2.6 Billion assets under management
- Approximately 40 programs
- 92 FTEs

IFA 101:

Perspective: Largest Iowa-Based Financial Institutions

Institution Name	City	Total Assets (\$000)
Bankers Trust Company	Des Moines	\$3,306,863
Iowa Finance Authority	Statewide	\$2,637,603
Principal Bank	Des Moines	\$2,451,847
Hills Bank and Trust Company	Hills	\$2,116,753
MidWestOne Bank	Iowa City	\$1,773,485
MetaBank	Storm Lake	\$1,738,004
Dubuque Bank and Trust	Dubuque	\$1,436,744
West Bank	West Des Moines	\$1,424,074
United Bank of Iowa	Ida Grove	\$1,239,784
Quad City Bank and Trust	Bettendorf	\$1,233,332
Bank Iowa	West Des Moines	\$1,164,460



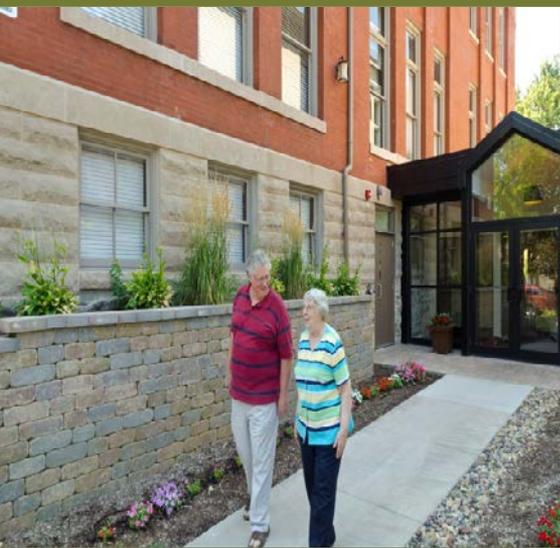
IFA 101: Overview

Core Program Areas:

- Affordable Rental
- Affordable Homeownership
- Iowa Title Guaranty
- Community Development
- Water Quality
- Iowa Agricultural Development Division (7.1.13)



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IFA 101: Affordable Rental

Project-Based Section 8

- Oversight of 223 Section 8 properties
- Serves 12,000 low-income lowans in 73 counties

HOME Program

- Administrator since July, 2010
- Rental
- Homeownership
- Tenant-Based Rental Assistance

Federal Housing Tax Credit Program

- Since 1986
- Invested in 600 properties and 23,000 units throughout Iowa



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IFA 101: Affordable Rental

State Housing Trust Fund

- Local Housing Trust Fund Program
- Project-Based Housing Program
- \$3.48 in other funds leveraged for every \$1 of SHTF funding

Homelessness Program

- Emergency Solutions Grant
- Housing Opportunities for Persons with AIDS
- Shelter Assistance Fund



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IowaHousingSearch.org



The screenshot shows the homepage of IowaHousingSearch.org. At the top, there is a dark red navigation bar with links for Home, Find Housing, List Housing, Info & Links, Disaster Housing, Trainings, About Us, and Contact Us. Below the navigation bar is a large graphic featuring a map of Iowa with a house icon on a location pin. The text "IowaHousingSearch.org" is prominently displayed in white, with the tagline "Iowa's free rental housing locator" underneath it. To the right of the map, there is a language selection dropdown menu with options for English and Español. Below the map, there is a welcome message: "Welcome to IowaHousingSearch.org, a free resource to help you find a rental home that fits your needs and budget. Property providers can list apartments or homes for rent any time, which means our list is always current." To the right of the welcome message are three large, yellow buttons with icons: "Find Housing" (house with magnifying glass), "List Housing" (house with plus sign), and "Info & Links" (information icon).

- Free to use—for landlords, individuals, agencies.
- Attend training to learn more.

Connect!

IowaFinanceAuthority.gov



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HOPWA Basics



HOPWA Basics: Homelessness & HIV

- Up to 70% of all persons living with HIV/AIDS (PLWHA) report a lifetime experience of homelessness or housing instability
- 3% to 14% of all homeless persons are HIV+ (10 times the rate in the general population)

HOPWA Basics:

Federal Response/Program Origin

- Established by the AIDS Housing Opportunity Act of 1990 (42 U.S.C. 12901)
- HOPWA regulations finalized in 1992 (24CFR Part 574)
- Administered by the HUD Office of Community Planning & Development (CPD), Office of HIV/AIDS Housing
- Monitored by HUD State & Local Field Offices
- Now approximately \$340,000,000 nationally each year

HOPWA Basics:

HUD's Overall Strategic Objectives

- ❖ Utilize Housing as a Platform for Improving Quality of Life
 - Improve health outcomes
 - Improve housing stability through supportive services for vulnerable populations including seniors, persons with disabilities, homeless persons & those at risk of being homeless

HOPWA Basics:

HOPWA In Iowa

- Formula funding
- Funding to sponsors determined by report from IDPH showing HIV diagnoses
- Five sponsors cover entire state
- Approximately \$400,000 per year total
- Any unused funds are returned to Iowa Finance Authority and redistributed for the next year
- Quarterly conference calls with sponsors

General HOPWA Requirements



General HOPWA Requirements

Eligible Activities

- Tenant Based Rental Assistance
- Short-Term Rent, Mortgage, and Utility Assistance
- Permanent Housing Placement
- Supportive Services
- Administration

General HOPWA Requirements: Client Eligibility: Two Basic Elements

Client Eligibility

```
graph TD; A[Client Eligibility] --> B[Documented HIV or AIDS—by a health professional]; A --> C[Gross income at or below 80% of the Area Median Income];
```

Documented HIV or AIDS—by a health professional

Gross income at or below 80% of the Area Median Income



General HOPWA Requirements: Determining the “Need”

- HOPWA housing is “needs-based”
- HIV & low income status are not sufficient reasons for assistance
- Health fragility, community supports, & risk of homeless are also considered
- Clients may not always get their preferred housing assistance choice
- HOPWA housing is only one form of assistance - not necessarily the “end” of a client’s housing stability journey



General HOPWA Requirements:

Initial Intake

- Gather basic HOPWA eligibility information
- Determine if a crisis warrants immediate assistance or referral
- Explain services & case management role
- Clarify client rights & responsibilities
- Secure consent for participation
- Obtain personal data & contact/emergency information, etc.
- Ensure corresponding documentation & paperwork is received



General HOPWA Requirements: Verifying Household Income

- 1st must secure Release of Information
- Collect source documentation
- Preferably third party verification
- Some cases may need to contact employer to accurately verify income
- Self declaration may be used only if there is no other means available



General HOPWA Requirements:

Things to consider...

- Sources of earned income
- Frequency of earned income
- Frequency of “gifts” & other contributions
- Pay period(s)
- Inclusions of overtime, tips & bonuses
- Variations in pay
- Lump sum additions
- Alimony
- Child support



General HOPWA Requirements:

Annual Income Definition

- Gross income of all adult household members 18 & older that is anticipated to be received during the next 12-month period
 - Gross amount: before deductions are taken
 - Income inclusions: types of income to be counted
 - Income exclusions: types of income not to be considered
 - Anticipated/annualized income: a projection of earnings over the next 12 months, based on current situation
 - Children living in unit 51% or more of the time, subject to shared custody, are considered part of the household
 - Unborn children do not count as part of the household



General HOPWA Requirements: Income Exclusions

- **Income is Excluded for:**
 - Earned Income of Minors (including foster children)
 - Earned income from full time students after the first \$480 (except head, co-head, or spouse)
 - Adult students living away from home
 - Live-in aides
 - Permanently absent family member
 - Temporarily absent family members
 - Adult students living away from home
- See full information from HUD on Income Inclusions and Exclusions—and use HUD workbook!



General HOPWA Requirements: Income Documentation

- **Third-party written verification:**
 - Pay stubs
 - Pension statements
 - For child support & alimony
 - ✓ Copy of signed & dated court records indicating payment amount
 - “Recurring gift” letters
 - Signed tax returns
 - Affidavits of zero income & no assets
 - Documentation of full-time student status
 - For Assets: Passbooks/letters completed by bank, real estate tax assessment or appraisal, statement by applicant, etc.



General HOPWA Requirements: Income Certifications

- Income certification must be complete before HOPWA assistance begins
- Households must qualify at the time of occupancy to receive a rental subsidy
- Verifications must be dated no earlier than 6 months prior to receipt of assistance



General HOPWA Requirements: Comparing Income to Limits

- **Income limits are adjusted by household size**
https://www.huduser.gov/portal/datasets/il/il15/index_il2015.html

Select the geographic area

1. Match to the number of persons in household
2. Compare the verified income of the household with the “low income” (<80%) limit for that household



General HOPWA Requirements: HUD Income Calculator

<https://www.hudexchange.info/incomecalculator/>

CPD Income Eligibility Calculator

Welcome to CPD's Income Eligibility Calculator, an interactive tool that makes determining the income eligibility and assistance amounts for beneficiaries of CPD programs as easy as 1-2-3. Simply enter the requested data and this calculator will work behind the scenes to generate a summary of results for each beneficiary. You should then print out the summary and include it as part of the beneficiary's file.

The calculator currently performs income eligibility and assistance amount calculations for the following HUD CPD programs:

- Brownfield Economic Development Initiative (BEDI)
- Community Development Block Grant Program (CDBG)
- CDBG Disaster Recovery Assistance
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Neighborhood Stabilization Program (NSP)
- Section 108 Loan Guarantee Program

Already Registered?

Sign in now and complete a previous calculation or start a new one.

[Sign In](#)

Need to Register for the CPD Income Eligibility Calculator?

[Register Now](#)



General HOPWA Requirements: Client Confidentiality

- Information on HIV/AIDS status only to be used for purpose of determining eligibility
- Information is accessible only to staff who work directly with client
- Files must be maintained in locked cabinets, or security software
- Caution with inadvertent disclosures (e.g., rent checks, caller ID, fax ID, housing quality inspections, publicity)

General HOPWA Requirements:

Confidentiality Protection

- Subsidiary organization with generic name for housing or IRS documentation sent to landlords
- Separate bank account with checks using a generic name
- P.O. Box for receiving mail related to housing assistance & payments to landlords
- Create dedicated phone numbers/lines with generic names for dealing with landlords & public

General HOPWA Requirements: Client Confidentiality

- **Federal Law: Health Insurance Portability & Accountability Act of 1996 (HIPAA)**
- Most HOPWA funded activities undertaken by providers are not covered by the HIPAA
- In order to be covered by HIPAA, an organization must:
 - Be a healthcare provider or health plan
 - Conduct covered transactions such as third-party billing
 - Send information electronically

General HOPWA Requirements: Fair Housing

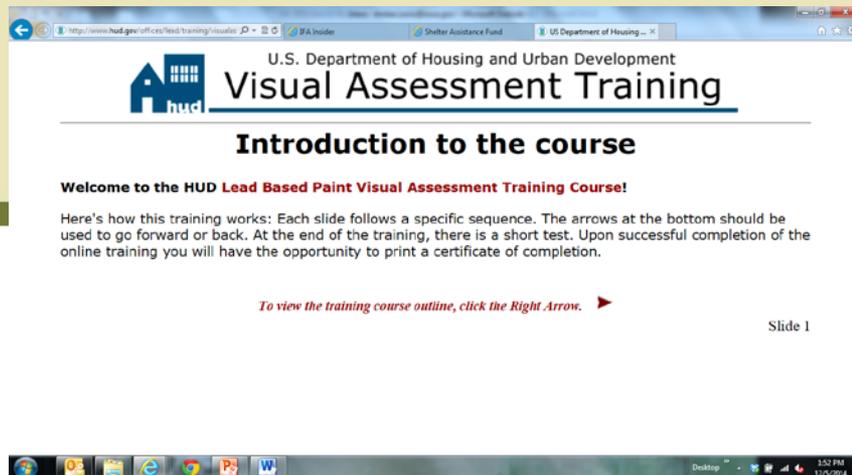
- Federal Fair Housing
- Iowa Fair Housing

All housing and shelter providers must follow fair housing laws, regardless of whether they are private or receive federal/state funding.

- Review posters
 - Does your agency already have these posted in all intake locations?

General HOPWA Requirements: Lead-Based Paint Requirements

- Applies to units occupied by a child under the age of 6 or pregnant woman
- Housing built PRIOR to 1978 must have visual lead paint assessment
 - ✓ Abatement conducted if problem areas found
- Prior online training course required:
<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>



The screenshot shows a web browser window displaying the HUD Visual Assessment Training course introduction. The page header includes the HUD logo and the text "U.S. Department of Housing and Urban Development Visual Assessment Training". The main heading is "Introduction to the course". Below this, a welcome message reads: "Welcome to the HUD Lead Based Paint Visual Assessment Training Course!". A paragraph explains the training sequence: "Here's how this training works: Each slide follows a specific sequence. The arrows at the bottom should be used to go forward or back. At the end of the training, there is a short test. Upon successful completion of the online training you will have the opportunity to print a certificate of completion." At the bottom of the slide, there is a red arrow pointing right with the text "To view the training course outline, click the Right Arrow." The slide number "Slide 1" is visible in the bottom right corner. The browser's address bar shows the URL "http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm".

General HOPWA Requirements: Housing Plans

- HOPWA regulations 24 CFR 574.310 require “appropriate” supportive services to be provided as part of **any** HOPWA-assisted housing
- HUD Notice CPD 06-07 STRMU states: “Grantees are required to conduct an ongoing assessment of the housing assistance & supportive services required by participants”
- Individualized Housing Plans are mandated as a means to address HOPWA’s outcome goals:
 - ✓ Increase housing stability
 - ✓ Improve access to care
 - ✓ Prevent homelessness

General HOPWA Requirements: Plan Update & Reassessment

- Purpose: Identify changes in circumstances that could impact housing plan
 - Health status
 - Family composition
 - Income/employment
 - Behavioral health needs

Revisit plan progress with each client encounter

General HOPWA Requirements: Intervals for Updating Plan

- Whenever significant changes occur in client's status
- If receiving time STRMU, at least 30 days prior to change in HOPWA support
- Otherwise, at least every 3 months/quarterly
- * HOPWA requires at least annual income & rent re-certification

General HOPWA Requirements: Working With Landlords

- Engagement:
 - Pro-active outreach (landlord associations, newspapers, knocking on doors)
 - Be patient & persistent
 - Know fair housing law
 - Appeal to their priorities:
 - * Focus on how you can be helpful & respond to their needs
 - * Recognize that they are business owners & that renting housing is their livelihood

General HOPWA Requirements: Working With Landlords

- Understand landlord priorities:
 - Rent payments
 - Apartment maintenance
 - Peaceful community
 - Keeping units filled
 - Assistance with problem tenants
- Provide education:
 - Available services
 - Knowledge of tenancy expectations
 - Positive experiences with other landlords



General HOPWA Requirements: HUD Regulations: Conflict of Interest

- **(b) Conflicts prohibited**
- The general rule - A conflict occurs with persons who:
 - 1. Exercise or have exercised any functions or responsibilities with respect to HOPWA-assisted activities
 - 2. Are in a position to participate in a decision making process, or gain inside information with regard to such activities
 - 4. Have a financial interest in any contract, subcontract, or agreement with respect to a HOPWA-assisted activity

General HOPWA Requirements:

HUD Regulations: Conflict of Interest

- 5. Obtain a financial interest or benefit from any HOPWA assisted activity or proceeds
- 6. Applies during tenure or for one year thereafter
- **(c) Persons covered under Conflict of Interest:**

Employees	Agents
Consultants	Board of Directors
Business Associates	Immediate Family Ties
Designated Public Agencies	Recipients or Sub-recipients
Elected/Appointed Officials	

General HOPWA Requirements

Termination of Assistance

1. Death of the client

- Surviving family may continue to receive housing &/or supportive services for a grace period
- No more than one year

2. Violation of regulations/program requirements

- Grantee must have a formal written process which follows due process law
- Process must include written notice, clear statement of reasons for termination, allowance for review/ rebuttal by client, & prompt written notice of final decision



General HOPWA Requirements

Record Retention

- Retain grant records for five years beyond the end of the grant
- Ensure confidentiality protections

Tenant Based Rental Assistance (TBRA)



TBRA

A closer look...

- Provides permanent housing rental subsidies for use in private market
- Subsidies cannot be transferred outside Iowa
- No restrictions on length of participation
- Household is only eligible to receive one type of HOPWA rental assistance at a time:
 - ✓ If subsidized through TBRA, NOT eligible to receive STRMU assistance

TBRA:

Key Elements of TBRA

- Fair Market Rent (FMR)

<http://www.huduser.org/portal/datasets/fmr.html>

- Rent Reasonableness
- Leases
- Housing Quality Standards
- Rent Calculation & Recertification



TBRA:

Payment Standard

- ✓ RR should be certified for all new leases & any requests for rent increases
- ✓ Documentation must be kept in file
- Gross Rent (contract rent plus utility allowance) cannot exceed the lower of the FMR or rent reasonableness standard

TBRA: Leases

- TBRA participants must be legal tenants
- & should have long-term leases in place
 - Copy on file signed by both parties
 - Renewable
 - Conforms to local tenant-landlord law
 - No illegal clauses
 - Clearly states who is responsible for each utility

Housing Quality Standards (HQS) / HOPWA Habitability Standards

- Housing inspections required for all assisted TBRA units
- Inspections documented & completed annually
- New unit inspections completed before start of subsidy
- Procedures in place for suspension/termination where property owners are non-compliant with making repairs
- HOPWA HQS/Habitability Standard Checklist

TBRA:

HOPWA Habitability Standards

1. Structurally sound
2. Sanitary condition
3. Accessible
4. Space for securing personal items
5. Good air quality
6. Healthy water supply
7. Adequate heat
8. Efficient light & electricity
9. Suitable kitchen facilities
10. Smoke detectors
11. Lead-based paint requirements



TBRA: HOPWA Rental Payments

- **HOPWA tenants must pay:**
 - The higher of 10% gross monthly income; **or**
 - 30% adjusted monthly income
- HOPWA pays the remaining rent portion up to the allowable Payment Standard
- 24 CFR Part 574.310(d)



TBRA: Adjusted Income

- Adjusted income = annual gross income minus allowable deductions (aka: allowances)
 - ✓ Divide the annual gross & the adjusted annual income by 12 to compare the higher monthly portion of the two amounts
- Income Allowances are not deducted when calculating income eligibility for all other HOPWA programs



TBRA:

Adjustments to Income

- There are 6 deductions/allowances that may apply from the total household's annual gross income:
 1. Elderly or disabled member
 2. Dependent
 3. Child care – out of pocket expenses
 4. Medical – out of pocket expenses
 5. Disability assistance – out of pocket expenses
 6. Earned Income Disregard (EID)



TBRA: Elderly Household

- Any household in which:
 - The head, co-head, spouse or sole member is 62 years of age or older
 - Two or more persons who are at least 62 years of age & live together
 - One or more persons who are at least 62 years of age & live with one or more live-in aides



TBRA:

Disabled Household

- A household in which:
 - The head, co-head, spouse or sole member is a person with disabilities
 - HIV with or without an AIDS diagnosis is considered a disability by HUD & the ADA (not for Section 8)
 - Two or more persons with disabilities who live together; or
 - One or more persons with disabilities who live with one or more live-in aides



TBRA: Elderly or Disabled Household Deduction

- Eligible households are entitled to one maximum deduction of \$400 each
 - Can claim only one, not both
 - Claim annually, or at the time of each recertification
- Distinction between elderly/disabled households & non-elderly/non-disabled households is essential to applying the allowances correctly



TBRA:

Dependent Deduction

- HUD defines a dependent as any household member who is not the head, co-head or spouse, but is:
 - Under the age of 18 years
 - Disabled (of any age)
 - A full-time student (of any age)
- Deduct \$480 from annual income for each household dependent
- Household members must qualify for the deduction at the time assistance is provided



TBRA:

Child Care Expense Deduction

- Reasonable “out-of-pocket” expenses for the care of a child age 12 or under may be deducted from annual income if:
 - This enables an adult family member to actively seek employment, be gainfully employed, or further his/her education;
 - & is not reimbursed by another source



TBRA:

Medical Expense Deduction

- Elderly or disabled households may deduct reasonable “out-of-pocket” medical expenses for all household members in excess of 3% of annual gross income:
 - Only for households where head, co-head, spouse, or sole member is at least 62 or disabled
 - If household is eligible for deduction, all family members’ medical expenses apply



TBRA:

Medical Expenses

- Allowable “out-of-pocket” medical expenses are established at the time of assistance
- Includes items such as:
 - Services of a physician or other health care professional
 - Services of a hospital or other health care facility
 - Medical insurance premiums
 - Prescription & nonprescription medicines



TBRA: Medical Expenses

- Dental expenses
- Eyeglasses & eye examinations
- Hearing aides
- Medical or health products or apparatus
- Live-in or periodic medical care assistance
- Periodic payments on accumulated medical bills



TBRA:

Earned Income Disregard

- Applies only at the time of income re-certification, not initial HOPWA eligibility
- Provides a total of 48 months of benefit to households whose annual income:
 - a. > as a result of employment of a family member who is a person with disabilities & who was previously unemployed for one or more years prior to employment
 - b. > as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program



TBRA:

Earned Income Disregard

- c. > during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families (TANF) funded under Part A of Title IV of the Social Security Act, in consultation with the local agencies administering TANF & Welfare-to-Work programs
 - ✓ TANF is not limited to monthly income maintenance
 - ✓ TANF includes such benefits & services as one-time payments, wage subsidies & transportation assistance, if the total amount over a six-month period is at least \$500



TBRA:

Utilities Allowances

- Utility allowances are required when a tenant pays for utilities out-of-pocket
- No allowance is provided when utilities are included in the total contract rent
- A Utility allowance is not the full total monthly utility bill incurred by the tenant
 - ✓ Utility allowances are an estimate determined by local PHA offices
 - ✓ Utility allowances are updated annually



TBRA:

When Tenant Pays Utilities

- Use the higher of 10% gross or 30% adjusted monthly income
- Determine applicable utility allowance, based on type & size of unit, & calculating the amounts for the types of utilities & kitchen equipment
- Subtract the total determined utility allowance from the previously calculated tenant rent portion payment
- This is the total portion of rent that the **tenant** pays to the landlord
- HOPWA pays the balance of the rent to the **landlord**
- If the tenant rent portion results in a negative number, this amount **must** be reimbursed directly to a utility company each month



TBRA:

Rent Calculation Steps

- Use HUD-approved Income & Rent Calculation form
- Calculate tenant gross & adjusted monthly income
- Determine tenant rent payment portion
- If utilities are not included, calculate allowance
- Ensure contract rent plus utility allowance does not exceed rent standard
- HOPWA pays the difference between contract rent & tenant payment portion

TBRA:

Re-certifications

- Household composition & income of all household members must be verified annually
- Follow same steps as initial certification (Start 60 to 90 days prior to expiration of most recent Income Certification)
- Timely notification of rent share adjustments (in writing)
- Written policy for changes in income during 12-month certification period
- Apply EID for all eligible households



TBRA:

HOPWA Shared Housing

- **HOPWA regulations allow for shared housing:**
- Rent based on a pro-rata share of the appropriately-sized portion of the dwelling used by the household
- **Example: Household using 1-bedroom 3-bedroom:**
- The rent standard would be 1/3 of the 3-bedroom FMR/Payment Standard
- Shared housing arrangements should be voluntary
- Shared housing counts each occupant/family as a separate household for reporting purposes



STRMU:

A Closer Look...

- Short-term Rent, Mortgage, & Utility Assistance is:
- Short-term homelessness prevention
- Assistance to promote & maintain stable living when unexpected HIV/AIDS or income-related situations impact ability to afford housing
 - Not intended to provide continuous or perpetual assistance
 - “Needs-based” assistance – **not** an entitlement
 - <https://www.hudexchange.info/resource/1015/hopwa-short-term-rent-mortgage-and-utility-strmu-assistance-fact-sheet/>



STRMU

- Statute limits assistance to no more than 21 weeks in any 52-week period
- 21 weeks do not need to be consecutive
- In Iowa, tracked by calendar year (beginning in January 2016)
- Habitability/HQS inspection not required

STRMU

- Recipients must already be housed for a time prior to eligibility for assistance:
- With name on the lease &/or demonstrate the responsibility for payment debt payment
- With name on a utility account &/or demonstrate the responsibility for paying debt
- With documented proof of the debt & reason for assistance need

STRMU: Documentation

- Documentation includes:
- Default or late payment notices
- Verifiable evidence of job loss, or other sources of income decrease or loss
- Verifiable evidence from a healthcare professional of a hospitalization &/or inability to work due to HIV/AIDS
- Reasonable indication that STRMU assistance is the most appropriate intervention for client's need at the time of the request

STRMU:

Assessing Need

- **Assessing “need” for STRMU is the most challenging of all HOPWA housing activities:**
- Recipients must already be housed for a time
 - No resources to meet rent, mortgage, or utility payments
 - No other sources of assistance are available
 - In the absence of STRMU assistance the applicant would otherwise be at risk of homelessness
 - With reasonable assistance the tenant is likely to remain stably housed into the future



STRMU:

Assessment, Services, & Housing Plans

- Assessment of housing & utility needs & financial circumstances must be conducted with each request
- Continuous money mis-management or lack of budgeting skills is not a valid reason for continued assistance
- Repeated use of STRMU from year-to-year may indicate the need for a deeper housing subsidy or a more affordable housing unit



STRMU:

Assessment, Services, & Housing Plans (Cont.)

- Housing plans should be created to address the issues leading to housing instability
- Housing plans should be regularly updated & monitored to address the on-going needs of the household
- Supportive services should be provided (or connected through referrals) to help achieve housing goals



STRMU:

Smoke Detector Certification

- Since unit is not subject to inspection requirement, but still must have adequate working smoke detectors
- Client may sign verification remotely

Client Files



Client Files: Contents

- Well maintained client files with adequate documentation are critical!
 - Completed intake/assessment forms with client data
 - Health status
 - Family composition
 - Income/employment
 - Behavioral health needs
- Signed Release of Information (ROI) **annually updated**
- Valid HIV/AIDS verification
- Completed household income verification with supporting documents - **annually updated**

Client Files: Contents (Cont.)

- Verification of expenses & supporting documents
- Signed program service agreement
- Housing plan/individual service plan with updates
- Completed gross income eligibility worksheet updated annually or when significant change occurs
- Completed gross & adjusted income & rent calculation worksheet for TBRA or facilities, updated annually or when significant change occurs



Client Files: Contents (Cont.)

- Shared housing rent calculation worksheet (if applicable)
- Current Fair Market Rent (FMR) & utility allowance charts (if applicable)
- Rent Reasonable comparison sheet
- Housing Inspection – Housing habitability/HQS inspection completed & Lead-based Paint Notification - **Annually updated** (if applicable)
- Case notes indicating client interactions & progress in meeting desired goals



Monitoring



Monitoring

- HUD ► Grantees ► Project Sponsors
 - Ensure requirements & stated program goals are met
 - Ensure funds are used for eligible purposes
 - Monitor compliance with standards
 - Enhance capacity through technical assistance
 - Forge working partnerships
 - Identify areas in need of improvement
 - Informed consent notice for clients: IFA and/or HUD may have access to client information for program monitoring.

Monitoring: Provides Verification Of...

- Compliance with HOPWA regulations, cross-cutting regulations, and applicable OMB Circulars
- Properly documented medical/income eligibility
- Properly documented housing quality standards
- Properly documented rent calculations
- Adherence to rental assistance timelines
- Program funding limits
- Maintenance of client confidentiality

Monitoring:

Provides Verification Of... (Cont.):

- Sound fiscal management, accounting & administrative practices
- Compliance with Fair Housing practices
- Adherence to procurement & disposition requirements
- Timely & accurate reporting
- Progress in meeting program goals
- Staffing –capacity, training, & turnover
- Assurance of “good practices” for each client



Monitoring:

Types of Monitoring

1. Remote monitoring:

- Timely & accurate invoices
- Adequate documentation to back-up invoices
- Pace of spending is within expectations
- Billing matches approved activities
- Audit reports received from sponsor
- Timely & accurate performance & outcome reporting

Monitoring:

Types of Monitoring

2. On-site monitoring:

- Sponsors have adequate written financial policies & procedures
- Internal cash controls are in place
- Sponsors adequately track grant & activity spending
- Sponsors properly allocate direct & indirect costs
- Time record documentation for all personnel costs, including administrative staff

Monitoring: On-site Visits

- What to expect:
 - Generally at least every other year
 - Typically will arrange in advance, some flexibility if necessary
 - Select random sampling of client files on site—usually around 10%, depending on total number of clients—at least 5 total files
 - Select additional agency documentation for review: last month financial statements, board meeting minutes for the past year, recent audit/financial review, financial policies/procedures, program policies, personnel policies
 - May last three-four hours total
 - Include interviews with program staff, financial staff, case manager, and often a client (arranged by the agency)
 - Agency staff not required to be present for entire visit—most of visit is spent reviewing files and documentation

Monitoring: Visit Follow-up

- IFA issues a letter detailing:
 - Findings: noncompliance with regulations
 - Concerns: issues that may lead to noncompliance
 - Recommendations: lesser concerns, suggestions for changes
- Letter will include:
 - An overview of what the visit found
 - Specific steps required
 - Timeline to complete follow-up steps
- If follow-up steps are completed:
 - In most cases, any findings or concerns are closed.

Monitoring: Monitoring Workbook

- Review workbook and client file checklist
 - What are the key areas monitored?
 - Who from your program would need to be involved?
 - Any surprises?

Financial Management



Financial Management: Key Components

- **Internal Controls**
- **Budgets**
- **Cash Management**
- **Record Keeping**
- **Procurement**
- **Property Controls**
- **Audits**



Financial Management: Requirements

- Approved applications & budgets
- Satisfactory audits
- Written internal policies & procedures
- Charts of accounts & accounting manual
- Separation of duties; clear lines of responsibility
- Regular reconciliations
- Maintenance of vendor invoices, bank statements, timesheets, purchase orders

Financial Management: Samples of Internal Controls

Requiring 2 signatures on checks

Separate responsibilities for receiving cash & checks from depositing

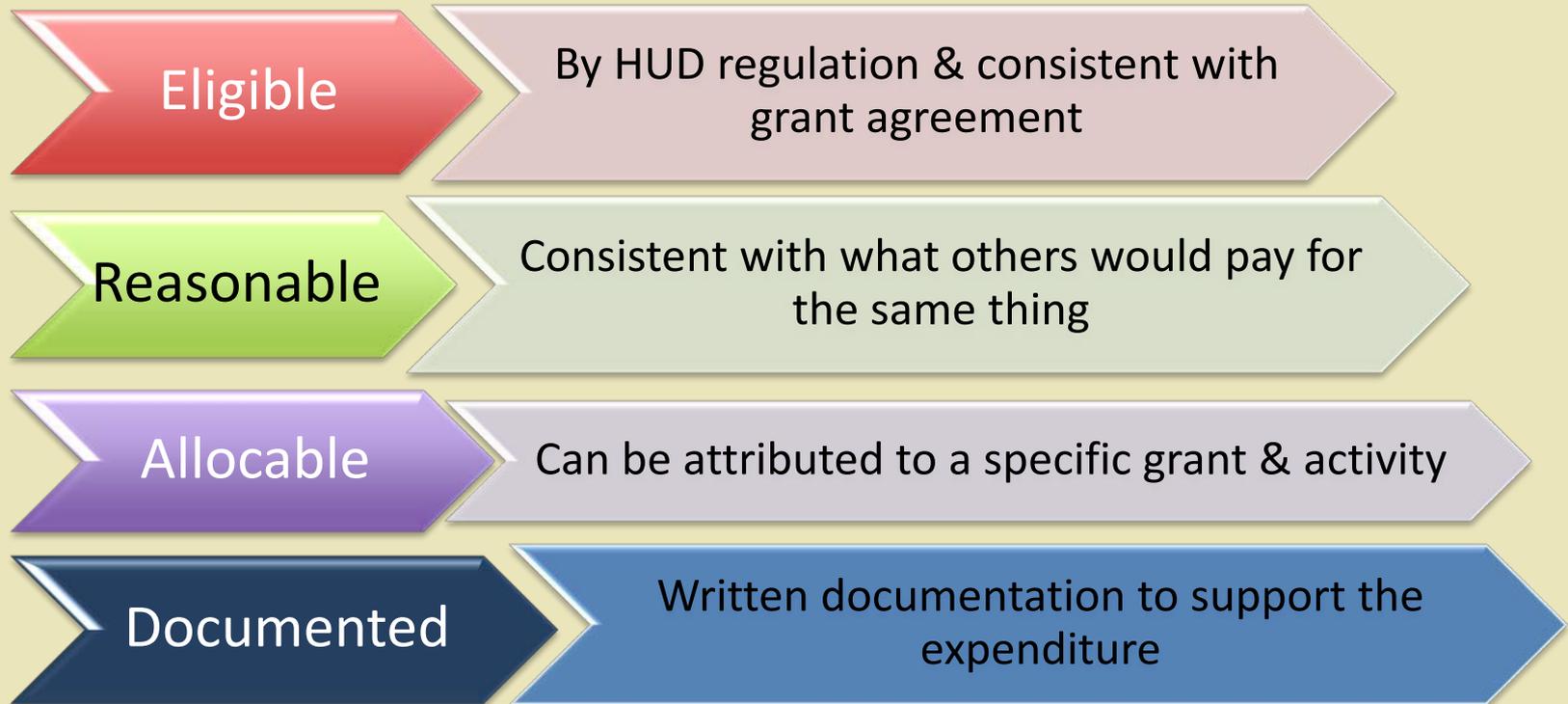
Having someone other than bookkeeper reconcile bank statements

Board involvement in financial management oversight



Financial Management:

Basic Principles of Allowable Costs



Financial Management: Administrative Costs

Definition

- General management
- Oversight & coordination
- Evaluation
- Reporting

Based on Actual Costs

- Cannot simply bill an = % of each month's expenditures
- Must have documentation of actual costs

Admin Vs. Program Activity

- Costs of managing rental assistance is a direct cost
- Supervision of case managers is a direct cost



Financial Management: Records Keeping & Documentation

- Accounting records must identify the source & use of all funds
- Accounting records must be supported by source documentation
- Controls must be in place to assure that costs charged to HUD grant are eligible for funding
- Financial records maintained for 5 years

Financial Management: Timesheets

- Time sheets must reflect actual times - not percentages
- Time sheets must be signed & dated by staff & supervisor
- If time is split between programs (RW, HOPWA, homeless) time sheets must reflect split
- Only actual HOPWA incurred costs can be charged to HOPWA



Financial Management: Receipts

- Must be legible
- Must be itemized
- Must clearly indicate which items were paid with HOPWA
- Should indicate a date expenses were incurred—within the time frame of the grant

Financial Management: Why Does it Matter?

Serious Consequences

- Funds recaptured
- Fines, penalties, & worse

Not Documented = Un-allowed

- Not just fraud & intentional
- Without document backup, funds can be recaptured

Sustain or Destroy Organization

- Proper procedures & systems are essential to organizational survival



Financial Management: HOPWA Financial Management Workbook

- Draw/Reimbursement Request Cover Form
- Draw Itemization Form
- Budget Revision Form

Discuss: How do the Cover Form and Expenditure Detail form fit together?

Discuss: When are budget revisions necessary? What is the process?

Financial Management: Data Reports with Draws

- Goals:
 - Data completeness
 - Data quality
 - Data timeliness
- Required with every draw—monthly or quarterly

Financial Management: Review of Sample Draw Documentation

- Review sample draw documents
 - Can you tell which category an expense belongs in?
 - Can you tell how much is charged to HOPWA?
 - Is it legible?
 - Is it HOPWA-eligible?
 - Does it show an expense was incurred?
 - Does it show a time period/date?
 - How/where would it be recorded in the draw worksheets?
 - How would the packet be organized?
 - When/where would it be submitted?
 - Is anything missing?

Financial Management: Submitting Draws

- Submit to Judy by mail, email, or fax (if fax, make sure to note that it is for Judy, or Homeless Programs)
- Quarterly or monthly
- Deadlines: end of month following end of quarter
- Should include all applicable expenses for that quarter
- Final draw deadline January 31st

Financial Management:

HUD HOPWA Financial Management Training and Certification

- Every sponsor must have at least one qualified representative that has completed the training and certification.

<https://www.hudexchange.info/training-events/courses/hud-hopwa-financial-management-online-training/>

Data Collection & Reporting



Data Collection & Reporting: HUD Reporting Requirements

- CAPER--Consolidated Annual Performance & Evaluation Report
 - CAPER #1: HOPWA CAPER
 - Sponsors send in client data, narrative details, and expenditure data for this
 - CAPER #2: the “big” CAPER—includes HOPWA and several other HUD formula programs—HOME Program, Emergency Solutions Grant, and Community Development Block Grant
 - We pull some data directly from the Institute for this
- IDIS - Integrated Disbursement & Information System
 - IDIS is our payment system currently with HUD
 - Sponsors request payment from IFA; we request payment from HUD in IDIS
 - Currently some limited accomplishment data required in IDIS
 - All CAPER reporting eventually moving into IDIS

Data Collection & Reporting: HMIS

- Web-base data collection & management system
 - Simplifies & improves reporting burden
 - Generates valid data for accountability, evaluation, & policy
 - Improves coordination with other HUD & federal programs
 - Increases collaboration
 - Streamlines intakes & coordination for case managers
 - Simplifies service access for clients
 - Improves benefits screening
 - Enhances service delivery
- HMIS Data & Technical Standards:

<https://www.hudexchange.info/hmis/hmis-data-and-technical-standards/>

Data Collection & Reporting: HOPWA & HMIS

- HOPWA sponsors in Iowa are required to participate in HMIS.
- HMIS Lead Agency in Iowa is the Institute for Community Alliances.
- Every user must be individually trained and certified. Do not share log-on credentials.
- Minimum requirement for client notice of data collection: **HMIS Notice of Data Collection poster visible in any location where client data is collected.** Recommended: Clients also sign Notice of Data Collection form, and keep in client file.

HOPWA CAPER



HOPWA CAPER

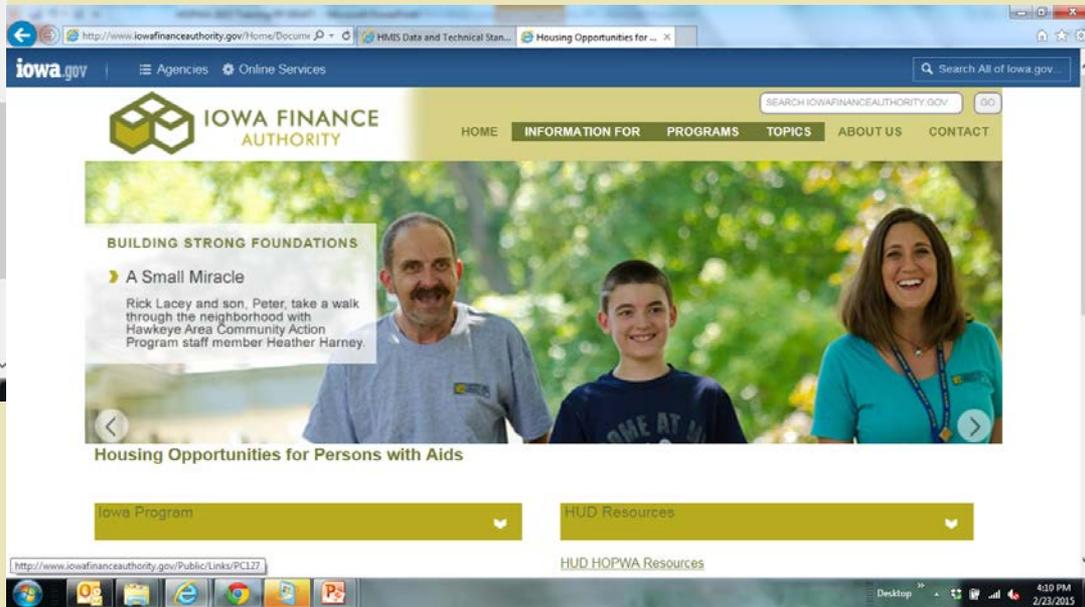
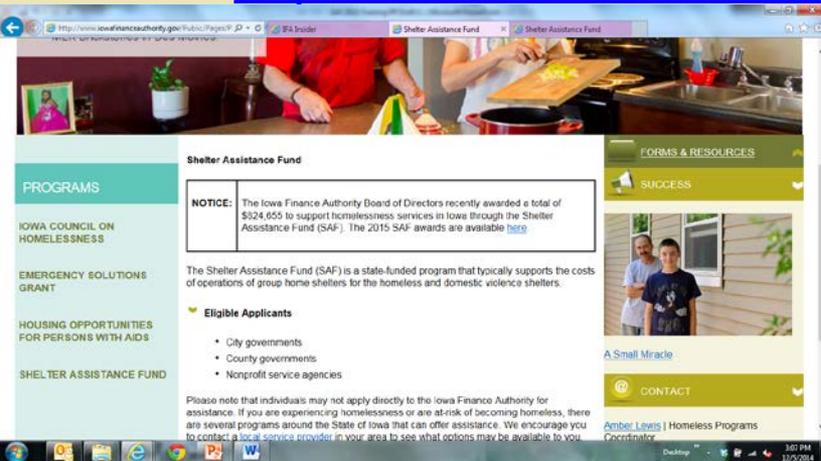
- CAPER associates HOPWA activities with Consolidated Plan & HUD performance
- Project Sponsor Information
- Program accomplishments & challenges
- Total numbers served & demographics
- Planned goals
- Actual performance,
- Expenditures & outcomes by activity
- Other funds leveraged
- Housing stability & access to care outcome
- Reports are submitted to HUD within 90 days after close of program year

Other Resources



Other Resources: IFA HOPWA Webpage

<http://www.iowafinanceauthority.gov/Programs/Homelessness>



Questions

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