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MEMORANDUM

Office of AIDS
Housing Opportunities for Persons With AIDS Program

Management Memorandum
Letter Number: 24-01

November 29, 2024

TO: Housing Opportunities for Persons with AIDS (HOPWA) Project Sponsors

SUBJECT: Compliance with the U.S. Department of Housing and Urban Development (HUD)
HOPWA recordkeeping requirements for client charts

Purpose

This Management Memo provides a reminder to Project Sponsors on compliance with HUD's HOPWA recordkeeping requirements for client charts.

Background

Earlier this year, the U.S. Department of Housing and Urban Development (HUD) conducted a remote monitoring of Housing Opportunities for Persons with AIDS (HOPWA) program to assess the California Department of Public Health (CDPH), Office of AIDS (OA) performance and compliance with applicable Federal program requirements. HOPWA program performance was assessed through a review of operations, client charts, and staff interviews.

During their review of client charts, HUD found that Project Sponsors are not collecting and maintaining accurate and complete client files. This can raise questions regarding clients' eligibility for the program and the amount of assistance provided to clients. Similarly, if a Project Sponsor does not have documentation of a habitability standards inspection, it could result in clients living in unsafe or unsanitary housing conditions. Finally, recordkeeping is an important service to clients, as it provides them with records that can help them qualify for other assistance programs.



Policy

All HOPWA documentation must be collected for HOPWA clients prior to service deliver during the fiscal year and maintained for a minimum of four years after the close of the contract period.

1. Eligibility Documents
 - a. Proof of HIV diagnosis (do not repeatedly request if already on file)
 - b. Proof of income
 - c. Proof of current residency
2. Program Enrollment
 - a. Self-Declaration of Zero Income (if applicable)
 - b. Household income eligibility worksheet
 - c. HOPWA program agreement
 - d. Demographic data
 - e. Consent to release or obtain confidential information
3. Short Term Rent, Mortgage, and Utilities (STRMU) Services
 - a. STRMU tracking worksheet and requirement attachments
 - b. Documentation of need
4. Tenant-Based Rental Assistance (TBRA) Services
 - a. Rent standard and rent reasonableness examination and required attachments
 - b. Rental assistance worksheet and requirement attachments
 - c. Violence Against Women Act (VAWA) lease addendum
 - d. Housing Quality Standards (HQS) Certification
5. Housing Case Management
 - a. Budget worksheet
 - b. Housing Plan
 - c. Case notes

6. Recertifications

- a. Recertification worksheet and required attachments

7. Outcome Data

- a. Service outcome assessment
- b. Termination letter (if applicable)

Action Required

Project Sponsors must adhere to the HOPWA recordkeeping requirements stated in this Management Memorandum. Please take the following actions:

All Project Sponsors must review their current processes and procedures to ensure that they are collecting and maintaining the aforementioned documents. Project Sponsors must make any necessary adjustments to their processes and procedures by January 1, 2025 to ensure compliance.

After HIV Care Connect is deployed later in the spring, OA will host a webinar to teach Project Sponsors how to utilize the system to document client eligibility and performance outcomes. Projects Sponsors are expected to attend.

Contact Information

For any questions regarding this Management Memorandum, please [contact the HOPWA Program](mailto:HOPWARFA@cdph.ca.gov) at HOPWARFA@cdph.ca.gov.

Sincerely,

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