



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

Special Attention of:

All HOPWA Permanent Supportive Housing (PSH)  
Grantees

All CPD Field Office Directors and  
Deputy Directors

Notice: CPD-25-05

Issued: May 29, 2025

This Notice remains effective until  
amended, superseded, or rescinded.

Cross References: 24 CFR Part 574 –  
Housing Opportunities for Persons With  
AIDS (HOPWA)

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**Subject:** Procedural Guidance for Fiscal Year 2025 HOPWA Permanent Supportive Housing  
Renewal and Replacement Grant Applications

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## **I. Funding Opportunity**

### **A. Purpose**

This Housing Opportunities for Persons With AIDS (HOPWA) notice announces the Renewal Grant Application and Replacement Supplemental Application requirements for eligible HOPWA Permanent Supportive Housing (PSH) grants expiring between June 1, 2025, and May 31, 2026. Eligible applicants will have the opportunity to apply for either a renewal or replacement grant and HUD will make awards to all eligible applicants that meet application and program requirements. The grant terms are for three years and only HOPWA PSH grants that were initially funded through a HUD competition for Fiscal Year (FY) 2010 or earlier are eligible for funding.

### **B. Program Description**

The purpose of the HOPWA program is to provide states and localities with the resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of people with HIV and their families. Through the HOPWA competitive PSH renewal and replacement grants, HUD provides HOPWA funding to states, units of local government, and nonprofit organizations to implement programs that provide permanent housing to people with HIV. Funded programs are expected to work toward goals that increase stable housing, reduce the risks of homelessness, and improve access to care for assisted families. Applicants are encouraged to support these goals by focusing on increasing access to permanent housing,

particularly through Tenant-Based Rental Assistance (TBRA), for low-income people with HIV and their families.

Eligible applicants will either be eligible for a renewal or a replacement grant. For the purposes of this notice, the application to continue an existing HOPWA PSH renewal grant will be referred to as the “Renewal Grant Application.” The application to replace existing program activities with new activities will be referred to as the “Replacement Grant Supplemental Application.”

### **C. Overview**

**Federal Agency Name:** Department of Housing and Urban Development

**HUD Program Office:** Office of HIV/AIDS Housing

**Funding Opportunity Title:** Procedural Guidance for Fiscal Year 2025 HOPWA Permanent Supportive Housing Renewal and Replacement Grant Applications

**Funding Opportunity Number:** CPD-25-05

**Assistance Listing Number:** 14.241

**Authority:** Based on the renewal and replacement authority provided by the Consolidated Appropriations Acts of 2024 (Pub. L. 118-42), the Department will renew or replace all eligible expiring HOPWA Permanent Supportive Housing (PSH) grants that meet program requirements and were initially funded through a HUD competition for Fiscal Year (FY) 2010 or earlier.

### **Key Dates:**

- a. Issued Date: May 29, 2025
- b. Letter of Intent Due: June 9, 2025
- c. Application Submission Deadline: Applications must be submitted by **11:59 PM ET on July 1, 2025.**
- d. Anticipated Awards Date: August 2025

**Agency Contact Information:** HOPWA@hud.gov

### **D. Summary Award Information**

Eligible FY2025 renewal applicants have the opportunity to submit a Replacement Grant Supplemental Application in addition to their Renewal Grant Application. This option allows you to replace the activities in a current expiring PSH grant with new, eligible program activities to reflect the current housing needs of people with HIV in your community.

A replacement grant is defined as replacing the activities in a current PSH award with new, eligible activities that significantly modify the grant. This could include eliminating or implementing new program activities (for example, eliminating facility-based housing and implementing a TBRA program), changing the population served, adjusting the project’s scope, adding or removing project sponsors, or altering the service area (within certain limits).

While submitting a Replacement Grant Supplemental Application is optional, it is encouraged if you are facing challenges implementing your current grant or seeing emerging needs in your community.

If the Replacement Grant Supplemental Application does not meet the scoring requirements, you are still eligible to be awarded a renewal grant, provided the Renewal Grant Application meets all program requirements. Therefore, there is no risk in submitting a Replacement Grant Supplemental Application. For more details, see Section V. of this notice.

## **II. Eligibility Requirements**

### **A. General**

**Renewal Grant Applications** are limited to the same funding activities and scope that are already approved under the expiring PSH grant.

**Replacement Grant Supplemental Applications** must demonstrate significant modifications to the original grant, potentially including new and different eligible activities. Simply requesting to serve fewer households under a currently approved activity is not a valid basis for a replacement grant.

Both renewal and replacement grants must meet the eligibility requirement that at least **51%** of the total funds be used for **permanent supportive housing** activities to eligible households. Permanent Housing is defined as housing where the tenant has a continuous legal right to remain, established by a lease or legally binding occupancy agreement, which is renewable after the first year. Permanent housing must remain the primary grant activity for both expiring and new PSH grants awarded under this Notice. Eligible Permanent Housing Activities include Tenant-Based Rental Assistance (TBRA), Operating Costs, and Leasing. Short-Term Rent, Mortgage, and Utility (STRMU) Assistance and Permanent Housing Placement (PHP) may count toward the PSH requirement depending on program structure and leveraged funds.

### **B. Eligible Applicants and Activities**

Eligible applicants for FY2025 HOPWA Permanent Supportive Housing (PSH) renewal and replacement grant funding are current HOPWA grantees with PSH grants that are set to expire between June 1, 2025, and May 31, 2026. A list of eligible FY2025 applicants is listed in Appendix A of this notice. Any other applicants that apply will be identified as ineligible and their applications will not be reviewed.

The standards for eligible activities under the HOPWA program are outlined in the HOPWA regulations at 24 CFR 574. A brief description of eligible budget line items is located at Appendix B and ineligible activities are listed in Section C. below.

You must submit a Renewal Grant Application to be eligible for funding. If applying for a replacement grant, you must submit the Renewal Grant Application and the Replacement Grant Supplemental Application.

### **C. Ineligible Activities**

The following activities cannot be funded under this notice:

- a. Capital Development. Funds cannot be used for property acquisition, new construction and rehabilitation projects.
- b. Health Services. Health services are ineligible if payment has been made or is expected to be made through insurance, a federal, state, or local program, health benefits, or prepaid services. HOPWA may act as a payor of last resort for health services but only for individuals with HIV, not their family members.
- c. Real Property Taxes and Fees. Property taxes and condominium fees are not eligible costs under Short-Term Rent Mortgage, and Utility Assistance unless they are part of the assisted family's mortgage payment.
- d. Personal Items and Expenses. Funds cannot cover personal items such as clothing, grooming, cash assistance, entertainment, pets, or other non-housing-related costs.
- e. Emergency Shelters and Transitional Housing. Emergency shelters and transitional housing funded with the operating and leasing budget line items are ineligible unless the applicant can establish a clear connection between the emergency and/or transitional housing assistance and the provision of permanent housing activities.

#### **D. Application Eligibility**

Your application is considered eligible for funding if it satisfies the application review requirements in Section V of this notice.

#### **E. Notification of Intent to Renew and Replace**

HUD will send eligible applicants a Letter of Invitation to apply for funding under this notice. We encourage you to thoroughly review the Letter of Invitation because it will have information regarding your current rate of expenditure, a link to the published notice, instructions for completing the Project Confirmation Worksheet (PCW), Letter of Intent deadline, and a HUD-40110-B Drafting Tool to assist you in completing your application.

#### **F. Letter of Intent**

Letters of Intent (LOI) to apply are due one week after the Letters of Invitation are distributed.

The LOI must include the following:

- A statement indicating your intent to submit a Renewal Grant Application;
- A statement indicating your intent to submit a Replacement Grant Supplemental Application, if applicable;
- Confirmation of current expenditures provided in the PCW and grant balance spend-down plan, if applicable; and
- Confirmation that remaining funds will be expended on or before May 31, 2026.

The LOI must be signed by an authorized representative (executive director or equivalent) and sent via email to both the Office of HIV/AIDS Housing at [hopwa@hud.gov](mailto:hopwa@hud.gov) and your local CPD Field Office Representative. HUD will only consider letters received after the deadline if HUD determines that unique and extenuating circumstances prevented timely submission.

#### **G. Project Confirmation Process**

The Project Confirmation process is one of the tools HUD uses to ensure compliance with HOPWA program requirements, communicate information regarding approved funding limits,

and ensure the most up-to-date contact information for grantees and project sponsors is on file. You must complete this process by submitting confirmation and required documentation with the LOI.

The project confirmation process starts when you receive the project confirmation worksheet (PCW), which will include the information below:

- Eligible funding amount;
- Current approved Budget Line Item (BLI) amounts for each activity;
- Eligible BLI amounts for the FY 2025 renewal grant;
- Spending analysis;
- Period of performance for expiring grant;
- Projected and achieved outputs (from the Consolidated APR/Caper); and
- Next steps to complete the PCW process.

You will be required to confirm or correct the information in the PCW and may be asked to provide additional justification related to the spending analysis. Once the information is confirmed and finalized, data from the PCW should be used as a tool to complete your renewal and replacement applications. The eligible funding amount listed in the PCW is the maximum grant amount for both renewal and replacement grants. After you have completed the PCW process and started the application process, the BLIs listed in the PCW should be used to complete the budget form (HUD-40110-B) for Renewal Grant Applications, but you can adjust the BLIs and associated amounts as part of the Replacement Grant Supplemental Application.

HUD will review and verify the information returned in the PCW. If HUD, in consultation with the grantee, determines that an extension beyond May 31, 2026, is necessary to fully spend the current PSH grant, the grantee will not be eligible to apply for a renewal or replacement grant under this Notice. Instead, you will need to submit an extension request to extend your current grant beyond May 31, 2026, and apply during the next renewal cycle, subject to the availability of funding for future renewal and replacement awards.

### **III. Renewal Application Requirements**

#### **A. Required Documents for the Renewal Application**

You must properly complete and submit the standard forms, assurances, and certifications in the order identified below with your renewal application. You can read more about standard forms on HUD's [Funding Opportunities](#) page.

*You are encouraged to use the tables as a checklist to make sure your renewal application has all the required documents.*

<b>Documents</b>	<b>Submission Requirement</b>	<b>Notes/Description</b>
<input type="checkbox"/> Application for Federal Assistance (SF-424)	Submission is required for all applicants.	The form can be accessed here: <a href="#">SF-424</a>

<input type="checkbox"/> Applicant and Recipient Assurances and Certifications (HUD-424B)	Submission is required for all applicants.	The form can be accessed here: <a href="#">HUD-424-B</a>
<input type="checkbox"/> Applicant/Recipient Disclosure/Update Report (HUD-2880)	Submission is required for all applicants.	The form can be accessed here: <a href="#">HUD-2880</a>
<input type="checkbox"/> Certification Regarding Lobbying	Submission is required for all applicants.	The form can be accessed here: <a href="#">Certification Regarding Lobbying</a>
<input type="checkbox"/> Disclosure of Lobbying Activities (SF-LLL)	Submission is required for applicants participating in lobbying activities.	The form can be accessed here: <a href="#">SF-LLL</a>
<input type="checkbox"/> Representations and Certification in SAM.gov	Completion at <a href="http://www.sam.gov">www.sam.gov</a> is required for all applicants.	To complete this requirement in sam.gov, answer "Yes" to the question "Does [organization] wish to apply for a federal financial assistance project or program or is [organization] currently the recipient of funding under any federal financial assistance project or program?"
<input type="checkbox"/> HOPWA Budget Form (HUD-40110-B)	Submission is required for all applicants.	The form can be accessed here: <a href="#">HUD-40110-B</a>
<input type="checkbox"/> Executive Summary	Submission is required for all applicants.	Page limit: 1 page
<input type="checkbox"/> Code of Conduct	Submission is required for applications that do not have a code of conduct in HUD's eLibrary.	Link: <a href="#">eLibrary</a>

## B. Description of Required Documents

### 1. HOPWA Budget Form (HUD-40110-B)

You must use the HUD-40110-B budget form to provide a clear and complete breakdown of how HOPWA funds will be used. The Summary Page should include details on the overall budget and leveraged funding by BLI activity. There must be a Detailed Budget page for the grantee and each project sponsor that includes the following:

- **Activity Description.** Provide a concise explanation that justifies the requested funding amounts for each BLI. The activity description should include staffing and number of Full-time equivalent (FTE) employees, and a breakdown of specific items/activities included in the BLI. Budget forms that have descriptions that state "see previously approved application" will not be accepted.

- Household/Unit Projection. Provide estimates of the number of households or housing units to be assisted. The total household/unit projection amount should consider annual attrition and present an unduplicated total of households/units to be assisted with the grant funding.
- Total Funding Amount for each BLI. Provide the total funding amount for each BLI. For renewal grant budgets, the total funding by BLI must match the amounts approved in the PCW.

You are strongly encouraged to use the HUD-40110-B Drafting Tool Spreadsheet and PCW to assist you with completing your renewal HUD-40110-B budget document.

### 1. Executive Summary

Submit a one-page summary of the grant including the required information and using the format below:

Required Information	Sample Format (NO Paragraphs)
<p>Grantee:</p> <p>Applicant Mailing Address</p> <p>Authorized Representative name and email</p> <p>Program contact name and email address</p> <p>Total Award Amount</p> <p>Project Sponsor(s):</p> <p>Mailing address</p> <p>Executive Director name and email address</p> <p>Program contact name and email address</p> <p>Award Amount</p> <p>Program Information:</p> <ul style="list-style-type: none"> <li>▪ Purpose of project</li> <li>▪ Activities to be Performed</li> <li>▪ Deliverables and Expected Outcomes</li> <li>▪ Intended Beneficiaries</li> <li>▪ Activities to be Performed by Project Sponsor</li> </ul>	<p><b>Grantee:</b></p> <p>Services of Support (SoS)</p> <p>111 Park Ave</p> <p>Anywhere, CA 12329</p> <p>Authorized Rep:</p> <p>Jane Lewis, <a href="mailto:JLewis@sos.org">JLewis@sos.org</a></p> <p>Program Contact:</p> <p>Aaron Lorde, <a href="mailto:alorde@sos.org">alorde@sos.org</a></p> <p>Award Amount: \$575,000</p> <p><b>Project Sponsor:</b></p> <p>Faith in the Future</p> <p>120 Fourth Street</p> <p>Seattle, WA 29291</p> <p>Executive Director:</p> <p>Marsha Johnson</p> <p><a href="mailto:mjohnson@faithinfuture.org">mjohnson@faithinfuture.org</a></p> <p>Program Contact:</p> <p>Henry Milk</p> <p><a href="mailto:hmilk@faithinfuture.org">hmilk@faithinfuture.org</a></p> <p>Award Amount: \$200,000</p> <p><b>Program Information:</b></p> <ul style="list-style-type: none"> <li>▪ Purpose: To provide permanent housing, homelessness prevention, and supportive services to low-income people with HIV in communities along the west coast.</li> <li>▪ Activities to be Performed by Grantee: Tenant Based Rental Assistance (TBRA), Supportive Services, Permanent Housing Placement (PHP)</li> </ul>



	<ul style="list-style-type: none"> <li>▪ Deliverables and Expected Outcomes: TBRA-25 households, Supportive Services- 30 households, PHP-28 households</li> <li>▪ Intended Beneficiaries- Low-income people with HIV</li> <li>▪ Activities to be performed by Project Sponsor: Faith in Future: TBRA-10 households, Supportive Services- 45 households</li> </ul>
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## 2. Code of Conduct

You are required to have an updated Code of Conduct on the HUD website for public viewing. Code of Conduct policies must comply with the requirements included in the “Conducting Business in Accordance with Ethical Standards” section of the Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards, as well as any program requirements. Your code of conduct must ensure compliance with federal ethical standards, including conflict of interest requirements under 2 CFR 200.318(c) and HUD-specific policies. Review the Code of Conduct website and elibrary to determine if HUD has your organization’s Code of Conduct policy on file.

If your organization’s Code of Conduct is not on file, you must forward an electronic copy to [askGMO@hud.gov](mailto:askGMO@hud.gov) with:

1. Organization’s UEI number
2. Legal business name
3. Complete mailing address
4. Executive authority contact information
5. Searchable electronic copy of the Code of Conduct

## IV. Replacement Grant Supplemental Application Requirements

### A. General

The replacement application is a supplement to the renewal application. Therefore, the renewal application must be submitted and approved before the Replacement Supplemental Application can be considered. Submitting the renewal application is required because, if your Replacement Supplemental Grant Application does not qualify for funding, you can still receive funding under your renewal application.

The replacement grant option provides current PSH grantees with the opportunity to update their programs to better reflect the current needs in their community. For the purposes of this notice, a replacement grant is defined as the replacement of a current PSH grant’s activities with different eligible activities in a manner that significantly alters the program design. This includes closing current budget line items (activities), opening new eligible budget line items, and changing the scope of the program.

Eligible activities for a Replacement Grant Supplemental Application are listed in Appendix B of this notice.

### **B. Funding Restrictions for Replacement Supplemental Grant Applications**

The following funding restrictions apply to replacement supplemental grant applications.

- The total grant award for a replacement grant may not exceed the maximum allowable grant amount listed on the PCW, described in Section II.F of this notice.
- The supportive services budget line item is restricted to no more than 35% of the total grant award.
- The resource identification budget line is restricted to no more than 10% of the total grant award.

### **C. Replacement Grant Supplemental Application Submission Process**

The Replacement Grant Supplemental Application must be attached and submitted in the same email as the Renewal Application. The Replacement Grant Supplemental Application must include the word “Replacement” in the file name and include all the required documents compiled into a single file.

### **D. Required Documents for the Replacement Supplemental Grant Application**

*You are encouraged to use the tables as a checklist to make sure your renewal application has all the required documents.*

<b>Document</b>	<b>Submission Requirement</b>	<b>Notes/Description</b>
<input type="checkbox"/> Replacement Executive Narrative	Submission is required for all replacement applications.	Page limit: 1 page
<input type="checkbox"/> Narratives to Address the Rating Factors	Submission is required for all replacement applications.	Rating Factors Page Limits Factor 1: 5 pages Factor 2: 3 pages Factor 3: 10 pages Factor 4: 3 pages Factor 5: 5 pages
<input type="checkbox"/> Replacement HOPWA Budget Form HUD-40110-B	Submission is required for all replacement applications.	Form: <u>HUD-40110-B</u>

#### **1. Description of Required Documents**

##### **a. Replacement Executive Summary**

The executive narrative is limited to one page and must include the name of the applicant, authorized representative and program contact name and email, full street address for applicant and project sponsors; an overview of the main components of the planned project including award amount, purpose, activities to be performed, deliverables and expected outcomes, intended beneficiary(ies) and project sponsor activities. The Replacement Grant Supplemental Application

executive narrative should follow the same formatting as the executive summary for the Renewal Application. An example of an executive summary can be seen in [Section III.B.](#)

**b. Narratives to Address the Rating Factors**

You must provide written responses to all five rating factors listed in [Section IV.E.](#) Each response should be placed under a separate heading that clearly identifies the rating factor being addressed. Use the narrative to clearly describe the proposed replacement activities, following the guidelines provided.

Narratives addressing the rating factors should be formatted as described below:

- Page Size: 8.5" x 11"
- Margins: one inch all around
- Font: Arial
- Font Size (body text): 11 point
- Font Size/Style for Headings: 16 point, Bold. (subheadings – 11 point, Bold.)
- Spacing: Double-spaced
- Headers: Left-justified – indicate the rating factor or executive narrative.
- Footers: Left-justified – name of applicant. Right-justified – page number out of total pages. (ex. Page 1 of 5)

**c. Replacement HOPWA Budget Form HUD-40110-B**

A HUD-40110-B form must be submitted to demonstrate how funds will be used for eligible HOPWA activities. The budget should follow the guidelines and requirements within this funding announcement. You are strongly encouraged to use the HUD-40110-B Drafting Tool Spreadsheet to assist you with completing your replacement budget document.

**E. Rating Factors**

The Replacement Grant Supplemental Application rating factors, point values, and page limits are listed below. HUD reviewers will not read past the page limit provided for each rating factor and pages that exceed the page limit will not be scored.

You should be responsive to each criterion for full points as reviewers will not consider information provided in other criteria responses when awarding points. Partial points may be awarded for a criterion if the response does not fully address the information needed for full points.

<b>Rating Factors</b>	<b>Page Limit</b>	<b>Points</b>
Factor 1: Capacity of the Applicant and Relevant Organizational Staff	5 pages (2 additional pages per project sponsor)	20 points
Factor 2: Need/Extent of Problem	3 pages	15 points
Factor 3: Soundness of Approach	10 pages	45 points
Factor 4: Leveraging	3 pages	5 points
Factor 5: Achieving Results and Program Evaluation	5 pages	15 points

### **Rating Factor 1: Capacity of the Applicant and Relevant Organizational Staff**

This factor addresses the extent to which the applicant has the organizational resources necessary to successfully implement the proposed activities. It is important that the applicant demonstrates its administrative and organizational capacity to implement housing and services programs for low-income people with HIV. You should strategically choose and involve team members with relevant experience. Team members should include the project manager and key staff relevant to carrying out the proposed activities. Team members will be evaluated in terms of recent, relevant, and successful experience in undertaking eligible activities.

You may also present a division or department within the organization as a team member if a group of people are responsible for carrying out a specific activity such as reporting. Responses that generally reference the organization will not receive full points. You may receive a maximum of 20 points for this factor. Responses are limited to 5 pages plus up to two extra pages for each project sponsor.

1. Describe relevant team member experience with implementing programs or projects similar to those proposed in the application. The response should include clear descriptions of similar programs or project activities implemented, households served, and length of organizational experience implementing these programs or projects.

*10 points* – Full points will be awarded if the application presents direct, extensive, and clear evidence of team member experience relevant to the proposed project activities in serving people with HIV and their families.

2. Describe relevant team member experience within the administrative and financial department and their capacity to administer a new project or activity. The response should include processes and systems established to ensure successful project implementation across departments, evidence of relevant financial accounting systems and experience, and relevant staff position titles with length of organizational service.

*10 points* – Full points will be awarded if the application presents direct, extensive, and clear evidence of team member experience, capacity, and knowledge in administering new projects or activities similar to those proposed in the application.

### **Rating Factor 2: Need/Extent of the Problem**

This narrative should show a clear need for the proposed activities and how they will be implemented to address the housing needs of low-income people with HIV in the community. You may receive a maximum of 15 points for this factor. Responses for Rating Factor 2 are limited to 3 pages.

1. Define your planned service area to the county level. You should indicate whether the proposed service area is different than the currently defined service area for your expiring PSH grant, and if it has changed, provide information on what has changed and why.

*2 points* – Full points will be awarded if the planned service area is clearly defined to the county-level and information is provided on whether there is a change in service area from the expiring PSH grant.

2. Describe the proposed replacement activities and how they will address the permanent housing needs of low-income people with HIV in the planned service area. Applicants should demonstrate a clear understanding of the need and the households to be served. Applicants are encouraged to use local data to support the justification of need. Data sources could include census data, health department statistics, Center for Disease Control (CDC) data sets, and other locally available data.

*8 points* – Full points will be awarded if the need in the service area is clearly described, supported with relevant HIV and housing data sources to support the need for the replacement activities, and total projected households to be served is documented. Projected total households must reflect the total households served is maintained or increased from the expiring PSH grant.

3. Describe efforts to include input from stakeholders, such as local AIDS Service Organizations (ASO), Ryan White Planning Councils, project sponsors (if applicable), and low-income people with HIV in the decision-making process.

*5 points* – Full points will be awarded if the applicant clearly describes efforts to obtain input from stakeholders in the decision to replace program activities. The response should include details on the process of engaging stakeholders and any relevant feedback received.

### **Rating Factor 3: Soundness of Approach**

This factor evaluates the approach the organization will use to implement the proposed project from intake through stable housing and the provision of supportive services, and the roles and responsibilities of coordinating organizations. You may receive a maximum of 45 points for this factor. Responses for Rating Factor 3 are limited to a total of 10 pages.

1. Describe the operations plan for the proposed project. Provide detailed information on how new activities will be integrated into the current service model. Include a timeline with details that outline how the replacement activities will be fully operational within 30 days of the grant's period of performance start date. Include the projected number of households to be served for each year of each activity.

*15 points* – Full points will be awarded if a detailed and reasonable plan from referral to enrollment is included with timeframes for completion by number of days and identifies staff responsible for each step in the process, projected number of housing units by type of assistance to be provided through the program by year over a 3-year period.

2. Providing quality supportive services is essential to assisting people with HIV to obtain and maintain stable housing. Describe the expected level of supportive services including:

- Which services will be provided to assisted individuals and families and whether services will be provided directly by the program or through agreements with other organizations;
- Maximum staff case load and justification for case load determination; and
- How the program will ensure the supportive services needs of eligible families are met.

Your response should explain how agreements and project plans will ensure assisted individuals and families can access and coordinate health services, income, mainstream benefits, and supportive services offered by your agency and within your community. The plan should clearly outline how you will document efforts to engage assisted individuals and families in supportive services and assure full access to a range of available services focused on improving housing stability and health outcomes.

*10 points* – Full points will be awarded if there is a precise, feasible plan that ensures eligible families have viable access to a wide variety of supportive services that address the unique needs associated with maintaining stable housing and achieving positive health outcomes for people with HIV.

3. Complete the HOPWA budget form (HUD-40110-B) with the amounts and descriptions that reflect the planned eligible activities outlined in the operational plan.

The budget form should provide a summary of the total budget for the project and a detailed budget page for the grantee and each project sponsor with the following information

- Description. Provide a concise explanation that justifies the requested funding amounts for each BLI activity. The description should include the number of FTE's funded and a breakdown of specific items/activities included in the budget line. Budget forms that state "see previously approved application" will **not** be accepted.
- Households. Provide estimates of the number of households to be assisted annually and for the total grant period of performance. The total number should be unduplicated and consider annual attrition.
- Number of Units. The number of housing units should be provided for the Operating and Leasing BLI activities.
- Funding Amounts. Provide annual amounts and the total amount of funding for each budget line item.
- Leveraged Funds. Provide the amount of leveraged funds committed for each budget line item on the summary budget.

Other housing activities not already authorized at 24 CFR 574.300(b) may be proposed but are subject to HUD's approval. If you are proposing an Other Housing Activity to be approved by HUD, there must be an additional narrative description (maximum two pages which are not included in page limit for Rating Factor 3) describing the Other Housing Activity proposed in the budget. Your proposal must address the expected beneficial impact of this alternative activity in addressing housing needs of eligible households by describing the project impact and the identified performance output and client outcome measures for this other activity. The Other Housing Activity will only be approved through the application review process. HUD will not consider proposals for use of the Other Activity as a budget amendment or at any other time

outside the application process. See Appendix B for a description of all eligible activities, including the Other Housing Activity.

*15 points* – Full points will be awarded if all budget amounts and descriptions reflect the planned activities discussed in this narrative, reflect funding amounts reasonable for the locality, and follow the guidelines and requirements within this funding announcement.

4. Funds for a replacement activity cannot replace state or local funds. The applicant must affirm through narrative response that funds for the proposed replacement activity will not replace any state or local funds.

*5 points* – Full points will be awarded if applicant affirms that funds will not be used to supplant local and state funds.

#### **Rating Factor 4: Leveraging**

This factor evaluates your ability to secure financial contributions for the proposed project from sources outside of this funding opportunity that will contribute to achieving project goals. Leveraging commitments may involve provisions of funding or services through partnerships or commitments from the applicant organization. Leveraged funds may be used for any program related costs, even if the costs are not budgeted or not eligible in the HOPWA program. Leverage may be used to support any activity within the project provided by the grantee or project sponsor. You may receive a maximum of 5 points for this factor. Responses for Rating Factor 4 are limited to 3 pages.

1. Provide a table of leveraged resources that supports the implementation of the proposed project. Include names and addresses of organizations providing the commitments (indicate if the organization is a project sponsor), type of commitment (non-cash resources, volunteer time, in-kind resources or services, or funds), the dollar value commitment, source of the funding or in-kind contribution (ex. federal, state, local, private), and the organization's authorized representative's name, title and contact information making the commitment.

*5 points* – Full points will be awarded if applicant provides clear, detailed information that reflects leverage commitments.

#### **Rating Factor 5: Achieving Results and Program Evaluation**

Responses to this factor must describe the project's proposed goals and outcomes and how data will be collected to make sure reporting is accurate and complete. The response should also include a plan to monitor and evaluate project achievements. You may receive a maximum of 15 points for this factor. Responses for Rating Factor 5 are limited to 5 pages.

1. Provide a strategy for measuring progress toward achieving performance measures linked to the HOPWA program purpose of meeting the housing needs of low-income people with HIV and their families. You should develop performance measures for each of the following areas: a) housing stability, b) housing permanency, c) health outcomes, and d) self-sufficiency. Performance measures should include goals, indicators, targets, data source, and baseline data.

*10 points* - Full points will be awarded if there is at least one performance measure for each required area and goals are all SMART (specific, measurable, achievable, relevant and time-bound).

2. Provide a plan for collecting client-level data to accurately complete the HOPWA Consolidated APR/CAPER (form HUD-4155). You should show that you have systems or processes in place to accommodate the data collection for the replacement activity.

*5 points* – Full points will be awarded if there is a clear data collection plan to gather the data elements in the required reporting form under this notice.

## **V. Application Review Information**

### **A. Threshold Requirements**

All submitted applications must satisfy the threshold requirements to advance to merit review. If you fail to meet one or more threshold requirements, your application is not eligible for funding and will not advance to the next phase of review. There are six threshold requirements that are listed below.

1. System for Award Management (SAM) Registration:
  - Your organization must be registered in SAM.gov before you submit an application to HUD.
  - Your organization must have a current and active registration in SAM.gov at all times while you have an active Federal award as a recipient or have an application under consideration by a Federal agency. Your organization must also review and update your information in SAM.gov annually from the date of your first registration or last update in SAM.gov to make sure the information is current, accurate, and complete.
  - You must have a valid Unique Entity Identifier (UEI) from SAM.gov to apply for funding and you must include the UEI in each application you submit to HUD.
2. Permanent Supportive Housing Activities:
  - Your submitted budget form must have at least 51% of total grant funds supporting permanent housing activities for eligible households.
  - Eligible Permanent Housing Activities include Tenant-Based Rental Assistance (TBRA), Operating Costs, and Leasing. Short-Term Rent, Mortgage, and Utilities (STRMU) and Permanent Housing Placement (PHP) may count toward the PSH requirement depending on program structure and leveraged funds. Additional information on permanent housing activities can be found in Appendix B.
3. History of Compliance with All Program Requirements. You must demonstrate a history of compliance with:
  - Program regulations at 24 CFR Part 574;
  - Terms and conditions of prior HOPWA grants, including timely submission of annual performance reports; and
  - Timely expenditure of funds consistent with notice of award requirements, with no significant unresolved audits or monitoring findings.



4. Complete Application
  - You must include all required documents as outlined in Section III.A and Section IV.D of the notice.
  - The Renewal Grant Application and, if applicable, the Replacement Supplemental Grant Application must be submitted together to be considered complete.
5. Grants Expiring within Eligibility Period:
  - Eligible applicants are those with HOPWA PSH grants expiring between **June 1, 2025, and May 31, 2026**. A list of eligible applicants can be found at Appendix A.
6. Application Submission Date:
  - Applications must be submitted by **11:59 PM ET on July 1, 2025**.
  - Late applications will only be considered if HUD determines that unique, extenuating circumstances prevented timely submission.

## **B. Risk Assessment**

Applications that meet the threshold requirements will undergo a risk assessment prior to the application's merit review, per 2 CFR 200.206. The Office of HIV/AIDS Housing (OHH) will work with HUD Field Offices to evaluate applicant risk. Examples of data that may be used to assess risk include data collected during and in response to program monitoring, information submitted in the Integrated Disbursement and Information System (IDIS), and data from the most recent Consolidated APR/CAPER.

In evaluating risks posed by applicants, the following areas may be evaluated:

1. Financial Stability. This includes a review of your timeliness of payments to project sponsors, contractors, staff, and landlords (if applicable), and documentation of compliance with tax filing including no instances of tax liens or bankruptcy.
2. Management Systems and Standards. This includes a review of your ability to meet the standards outlined in 2 CFR Part 200 and the quality of the organization's grants management system.
3. History of Performance. This will review your record of performance in managing federal awards, including timeliness of applicable reporting requirements, adherence to the terms and conditions of the federal award, and if applicable, the extent to which any previously awarded amounts will be expended prior to awarding funding under this notice. HUD may deny your application for renewal if your HOPWA Consolidated APR/CAPER is determined to be substantially incomplete, or you have failed to fulfill program reporting requirements.
4. Organizational Capacity. This includes a review of your ability to effectively implement statutory, regulatory and program requirements.
5. Monitoring and Audit Reports. This includes a review of reports and findings from audits performed under subpart F of 24 CFR Part 574. A monitoring or audit finding is considered unresolved if it is not addressed through a corrective action plan approved by the local HUD Field Office or auditor. Unresolved monitoring or audit findings may result in you being denied funding.

HUD may also identify capacity concerns based on the application content submitted under this notice, which could affect the awarding of grant funding. In accordance with 2 CFR 200.208,

HUD may impose specific conditions on the renewal or replacement grant if a risk evaluation determines it is warranted, either before or after the grant award.

### **C. Renewal Application Review**

Renewal applications meeting threshold and program requirements will not be denied funding. HUD may require renewal applicants to correct or revise information submitted after the final FY2025 award announcements and prior to executing the notice of award.

### **D. Replacement Application Review**

HUD will review the Replacement Grant Supplemental Application rating factor narratives and award points for each factor as described in Section IV.E. A maximum of 100 points may be awarded under Rating Factors 1 through 5. Partial points may be awarded for a criterion if you do not fully address the information needed for full points. You must receive a minimum of 70 points to be awarded a replacement grant. If the Replacement Grant Supplemental Application does not receive the minimum required rating factor score, then you will still be eligible to receive funding under the Renewal Grant Application.

### **E. Application Deficiencies**

If during the review process, HUD identifies deficiencies in the application, they must be resolved before the notice of award is executed. Deficiencies could include discrepancies in the submitted budget or inconsistencies with information provided in the application. The following steps will be taken to resolve application deficiencies.

- HUD will email the authorized representative and program contact listed on the SF-424 to set up a meeting to discuss identified deficiencies. The authorized representative must participate in the call. HUD recommends that any staff who participated in the application development be included in this meeting. You will be provided with no more than two meetings to review and resolve the identified deficiencies.
- After each meeting, you will be provided with up to, but no more than four (4) business days to address application deficiencies and to re-submit documents as requested by HUD.
- HUD will review the information and determine whether all deficiencies have been corrected. If the application resubmission, after the second meeting, still contains significant deficiencies, your grant administration capacity may be re-evaluated, and HUD may impose additional special conditions to address organizational capacity.
- You will be granted no more than two meetings, and two re-submissions to resolve application deficiencies and special conditions. After the second meeting, HUD reserves the right to make minor adjustments to the budget forms as needed.

### **F. Award Notice**

Following the review process, HUD will notify you by email that your final application has been approved and recommended for funding. The notification will include a copy of your final approved application which will be incorporated into the notice of award. We strongly encourage program and finance staff to familiarize themselves with the requirements and budget in the final approved application because the program must be implemented as approved in the final application.

Once funding is approved, you will receive a grant award letter notifying you of approval for either a renewal or replacement grant and final funding amount. You will then receive the official notice of award shortly before your current grant ends. You should keep your program running and use up your current funds before signing the new notice of award because the new grant period of performance begins on the date you sign the notice of award. If you run out of funds before your new grant start date, you may request approval to incur pre-award costs in accordance with 2 CFR 200.458. HUD will ensure you have adequate support to properly set up the grant and make the first drawdown in IDIS.

## **VI. Award Administration Information**

### **A. Budget and Program Amendments**

Budget and program amendment requests may not be submitted in the first year of the grant. HUD will accept amendments for review at the beginning of the second year. Any requested change to the budget or program should be based on actual expenditures and changing needs of the community. If there is a situation where an amendment is needed in the first year, HUD will consider the amendment only if the grantee provides sufficient justification that the grant cannot be operated as approved but is still able to meet other applicable requirements.

The regulations at 24 CFR 574.260 govern the process for making budget and program amendments within scope and purpose of the grant. You should consult with your local field office CPD Representative for more information on budget and program amendments.

The following are non-approvable budget amendments:

- Funding adjustments that exceed the statutory limits for administrative costs (i.e., 3 percent of the grant award for the grantee and 7 percent for a project sponsor).
- Funding adjustments that would result in the Supportive Services BLI exceeding 35 percent of the total award.
- Changes in the committed leveraging amounts used in the coordination of housing assistance and supportive services. If leveraged resources are withdrawn, you will be required to secure additional leveraged resources to maintain the level committed in the application. You may not reduce the level of leveraged resources.
- A request to open a BLI that was not approved in the grant application.
- Any changes that are not within the purpose and scope of the grant.

### **B. Data and Reporting**

1. HOPWA Consolidated APR/CAPER (form HUD-4155). You will be required to submit a HOPWA Consolidated APR/CAPER (form HUD-4155) report within 90 calendar days after the end of each operating year. In the final year of the grant, the HOPWA Consolidated APR/CAPER report will be due within 120 calendar days after the period of performance end date.

2. Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282) as amended (FFATA). FFATA requires information on federal awards be made available to the public via a single, searchable website, which is [www.USASpending.gov](http://www.USASpending.gov). Accordingly, each award HUD makes under this NOFO will be subject to the requirements provided by the Award Term in

Appendix A to 2 CFR part 170, “REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION,” unless the Federal funding for the award (including funding that may be added through amendments) is not expected to equal or exceed \$30,000. Requirements under this Award Term include filing subaward information in SAM.gov by the end of the month following the month in which the recipient awards any sub-grant equal to or greater than \$30,000.

### **C. IDIS**

You are required to use the Integrated Disbursement and Information System (IDIS) for financial transactions for approved project activities. IDIS requires separation of duties for drawing down funds, therefore, you must have at least two employees with access to IDIS. To ensure a smooth transition and timely access to funding, new user access should be requested at least 90 days before your current grant expires. Information on IDIS account creation and maintenance can be found [here](#).

### **D. Information Collection**

The information collection requirements contained in this document have been approved by the Office of Management and Budget under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and are assigned the OMB control number of 2506-0133 (exp. 12/31/2027).

### **E. Federal Requirements**

Renewal and Replacement activities are subject to all HOPWA requirements at 24 CFR Part 574. This section is intended to highlight some of the recent changes in the applicable federal requirements. Grantees will be required to comply with the applicable requirements at 2 CFR part 200, as may be amended from time to time. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in 24 CFR part 574, activities carried out under the grant after the effective date of the part 200 amendments will be governed by the part 200 requirements as replaced or renumbered by the part 200 amendments.

#### **1. Uniform Administrative Requirements and Cost Principles, and Single Audit.**

On April 22, 2024, the Office of Management and Budget published a notice of final guidance, which makes significant changes to 2 CFR part 200 and other parts of title 2 of the Code of Federal Regulations (2 CFR). The new changes became effective October 1, 2024. HOPWA grantees are strongly encouraged to review the April 22, 2024, notice, because all HOPWA grantees must comply with the applicable requirements at 2 CFR part 200, as may be amended from time to time, except where those requirements conflict with the HOPWA program statute or regulations. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in 24 CFR part 574, activities carried out under the grant after the effective date of the part 200 amendments will be governed by the part 200 requirements as replaced or renumbered by the part 200 amendments. The notice of the changes is available at: <https://www.federalregister.gov/documents/2024/04/22/2024-07496/guidance-for-federal-financial-assistance>

#### **2. Carbon Monoxide Alarms.**

As explained in Notice CPD-22-15, all HOPWA grantees and project sponsors must now ensure carbon monoxide (CO) alarms or detectors are installed as required by 42 U.S.C. 12905(i) in all HOPWA assisted units. This includes units assisted with acquisition, rehabilitation, conversion, lease, and repair of facilities to provide housing and services (24 CFR 574.300(b)(3)); new construction (24 CFR 574.300(b)(4)); project or tenant-based rental assistance (24 CFR 574.300(b)(5)); short-term rent, mortgage, and utility payments (24 CFR 574.300(b)(6)); permanent housing placement (24 CFR 574.300(b)(7)); and operating costs (24 CFR 574.300(b)(8)). Please refer to Notice CPD-22-15 for further guidance on this new requirement.

### 3. Environmental Requirements.

HOPWA PSH grants are subject to environmental review under 24 CFR Parts 50 and 58 and the HOPWA environmental regulation at 24 CFR 574.510. The grantee, its project partners, and their contractors are prohibited from taking any choice limiting actions under 24 CFR 58.22, such as acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a project, or committing or expending HUD or non-HUD funds for such actions, until the responsible entity (as defined by 24 CFR 58.2(a)(7)) has completed the environmental review procedures required by 24 CFR part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved, if applicable, in compliance with the National Environmental Policy Act and implementing regulations at 24 CFR part 58, or HUD has performed an environmental review under 24 CFR part 50 and the grantee has received HUD approval of the proposed activity. HUD will not release grant funds if the recipient or any other party commits grant funds (i.e., incurs any costs or expenditures to be paid or reimbursed with such funds) before the recipient submits and HUD approves its RROF, where such submission is required. Extensive information on the environmental review process can be found online here.

Although all HUD-assisted activities require the completion of HUD's environmental review process, many eligible activities under this Notice are exempt or categorically excluded from NEPA environmental review requirements and only require a lower level of environmental review. Eligible applicants should be aware that there are certain eligible activities and circumstances that may require a higher level NEPA environmental review. For example, the relocation of existing facility-based assistance and the leasing of new units not selected by the tenant would both be subject to NEPA environmental review requirements. Responsible entities must document the environmental review process for all activities.

### 4. Lead-Based Paint Requirements.

When providing housing assistance funding for purchase, lease, support services, operation, or work that may disturb painted surfaces of pre-1978 housing, you must comply with the lead-based paint evaluation and hazard reduction requirements of HUD's lead-based paint rules (Lead Disclosure; and Lead Safe Housing (24 CFR Part 35)), and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR Part 745)). When providing education or counseling on buying or renting housing that may include pre-1978 housing, when required by regulation or policy, inform clients of their rights under the Lead Disclosure Rule (24 CFR Part 35, subpart A), and, if the

focus of the education or counseling is on rental or purchase of HUD-assisted pre1978 housing, the Lead Safe Housing Rule (subparts B, R, and, as applicable, F - M).

#### 5. Build America, Buy America.

The Grantee must comply with the requirements of the Build America, Buy America (BABA) Act, 41 USC 8301 note, and all applicable rules and notices, as may be amended, if applicable to the Grantee's infrastructure project. Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver.

### F. Reporting

HUD is implementing new grant management and reporting tools, which will be rolled out for use by grantees in the near term. Grantees will be required to report on grant performance and financial activities (including vendor and cash disbursement supporting details for recipients and sub-recipients) using these new tools when they are released. HUD will work with grantees to support the transition to this new reporting environment. Once implemented, timely reporting in this new environment will be mandatory. HUD reserves the right to exercise all available rights and remedies for any noncompliance with these grant management and financial reporting requirements, to include requiring 100% review or stopping future disbursements altogether if reporting is not timely submitted.

### G. Presidential Executive Actions Affecting Federal Financial Assistance Programs

Regarding current and future Presidential Actions, all recipients of Federal financial assistance are responsible for making sure activities funded by Federal awards comply with applicable existing and future executive orders and other Presidential Actions, as advised by the Department, whether the recipients carry out those activities directly or use contractors or subrecipients to carry out those activities. The list below highlights some of the executive orders that apply to recipients of HUD's financial assistance programs. However, the below list is not intended to include an exhaustive list of all executive orders applicable to HUD awards.

Recipients may find additional executive orders at the following webpage: [Presidential Actions – The White House](#).

Executive Orders (EOs)	EO Summary	Link to EO
EO 14219, <i>Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative</i>	EO 14219 requires agencies to focus its limited enforcement resources on regulations authorized by constitutional Federal statutes.	<a href="#">14219 (Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative)</a>
EO 14218, <i>Ending Taxpayer Subsidization of Open Borders</i>	EO 14218 prohibits taxpayer resources and benefits from going to unqualified aliens.	<a href="#">14218 (Ending Taxpayer Subsidization of Open Borders)</a>
EO 14202, <i>Eradicating Anti-Christian Bias</i>	EO 14202 establishes a taskforce to eradicate Anti-Christian bias within the	<a href="#">14202 (Eradicating Anti-Christian Bias)</a>

	U.S. Department of Justice.	
EO 14205, <i>Establishment of the White House Faith Office</i>	EO 14205 establishes the White House Faith Office within the Executive Office of the President to empower faith-based entities.	<a href="#">14205 (Establishment of the White House Faith Office)</a>
EO 14182, <i>Enforcing the Hyde Amendment</i>	EO 14182 prohibits the use of Federal taxpayer dollars to fund or promote elective abortion.	<a href="#">14182 (Enforcing the Hyde Amendment)</a>
EO 14173, <i>Ending Illegal Discrimination and Restoring Merit-Based Opportunity</i>	EO 14173 requires Federal agencies to terminate all discriminatory and illegal preferences.	<a href="#">14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity)</a>
EO 14168, <i>Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government</i>	EO 14168 sets forth U.S. policy recognizing two sexes, male and female.	<a href="#">14168 (Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government)</a>
EO 14151, <i>Ending Radical and Wasteful Government DEI Programs and Preferencing</i>	EO 14151 requires the Director of the Office of Management and Budget (OMB) assisted by the Attorney General and the Director of the Office of Personnel Management (OPM) to coordinate the termination of all discriminatory programs and activities.	<a href="#">14151 (Ending Radical and Wasteful Government DEI Programs and Preferencing)</a>
EO 14148, <i>Initial Rescission of Harmful Executive Orders and Action</i>	EO 14148 revokes 67 EOs that were each issued between January 20, 2021, and January 16, 2025; and 11 Presidential memoranda issued between March 13, 2023, and January 14, 2025, to advance fairness, safety, and improve the economy.	<a href="#">14148 (Initial Rescissions of Harmful Executive Orders and Actions)</a>

**Appendix A – Eligible Applicants**

<b>Grantee Name</b>	<b>Expiring Grant #</b>
AIDS Alabama	AL-H220014
Vivent Health	WI-H210051
Cascade AIDS Project	OR-H220001
City of Baltimore	MD-H220018
City of Dallas	TX-H220003
City of Key West	FL-H220017
Cornerstone Services, Inc.	IL-H220016
Frannie Peabody Center	ME-H220002
Health Care for Homeless, Inc.	MD-H220007
Health Services Center, Inc.	AL-H220015
I.M. Sulzbacher	FL-H220013
Justice Resource Institute	MA-H220011
Kentucky Housing Corporation	KY-H220005
Oregon Health Authority	OR-H220009
Public Health Management Corporation	PA-H220012
State of New Hampshire	NH-H220050
The State of Rhode Island Office of Housing and Community Development	RI-H220006
The State of Rhode Island Office of Housing and Community Development	RI-H220004
Unity of Greater New Orleans	LA-H220051
Doorways (MO)	MO-H210013
Community Healthlink, Inc.	MA-H210052
New Jersey Department of Health	NJ-H210021
Bailey House, Inc.	NY-H210017



## **Appendix B – Eligible Activities**

The standards for eligible HOPWA activities are established in the HOPWA regulations at [24 CFR 574.300](#).

### **Operating Costs**

Funding may be used for the grantee's or project sponsor's cost of operating housing owned or leased by the grantee or project sponsor, to the extent the costs are necessary to house eligible households.

Eligible Operating Costs include:

- Utilities (like water, electricity, gas, etc.);
- Property insurance.
- Small repairs and regular maintenance inside and outside the building;
- Procurement and contracting of services for facility operation or maintenance;
- Furniture and appliances that will remain with the facility/program;
- Food purchases and kitchen operation for HOPWA households living in the housing;
- Housing inspections to ensure HOPWA habitability standards are met;
- Verification of household eligibility for HOPWA;
- Calculation of resident rent payment (if applicable); and
- Staff time for directing and carrying out any of the eligible operating costs mentioned above.

### **Leasing**

Funding may be used to lease all or a portion of a building as needed to provide housing to eligible households. The lease is always in the organization's name. The furniture, housing equipment, and supplies, eligible under the operating costs Budget Line Item (BLI), belong to the organization and remain in the unit for the next household's use.

Eligible Leasing costs include:

- Verification of household eligibility for HOPWA;
- Calculation of resident rent payment (if applicable);
- Monthly lease payments for a housing facility or scattered site units;
- Staff time to negotiate lease terms with lessor or landlord;
- Housing inspections to ensure HOPWA habitability standards are met; and
- Reasonable travel costs to units for housing inspections.

For eligible individuals or families unable to hold leases in their names, funding may be used to master lease units, where the eligible households choose the units, the grantee or project sponsor leases the units and pays the full rent to the landlord, and the eligible households pay the grantee or project sponsor the amount required by 24 CFR 574.310(d). This type of master leasing can be administered as “turnkey” housing assistance, to be replaced with TBRA if the landlord agrees to transfer the lease to the eligible person.

Funding may also be used to master lease units to be operated as transitional housing for eligible households. For example, post-incarceration programs often lease a unit to temporarily house an eligible household returning to the community until other more permanent housing arrangements can be made.

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

Funds may be used to provide long-term rental subsidies for eligible households. Unlike leasing, tenants receiving TBRA hold their own lease. TBRA has no time limit, but grantees and project sponsors should engage with assisted families to connect them with available supportive services and community resources that promote self-sufficiency or transition to other housing subsidies.

Eligible TBRA costs include:

- Verification of household eligibility for HOPWA;
- Calculation of resident rent payment;
- Monthly rent payments;
- Unit inspections for compliance with habitability standards,
- Review of rent reasonableness and rent standards;
- Resolution of landlord issues related to TBRA, and
- Reasonable travel costs to units for housing inspections.

Security deposits are not an eligible expense under TBRA. Permanent Housing Placement (PHP) can be used in conjunction with TBRA, where PHP covers the security deposit and TBRA covers ongoing rental subsidy.

### **Short-Term Rent, Mortgage, and Utility (STRMU)**

Funds may be used to provide short-term assistance (up to 21 weeks per 52-week period) to prevent homelessness for eligible households who rent or own their homes. This can cover rent, mortgage, or utility payments based on the household's specific needs. The amount of STRMU assistance provided to an eligible family should be based on that specific family's need, as opposed to a uniform dollar amount per household.

Eligible STRMU costs include:

- Up to 21 weeks of the eligible family's rent, mortgage, and/or utility costs;
- Costs of staff time to review and determine family program eligibility; and
- Staff time to make the STRMU payments.

STRMU mortgage assistance may include costs for taxes, insurance, or condo fees if these are included in the monthly mortgage payment either by federal regulation or the terms of the mortgage. Taxes, insurance, or condo fees not included in the monthly mortgage payment are ineligible.

### **Housing Information Services**

Funding for Housing Information Services may be used to provide counseling, information, or referral services to assist eligible families to locate, acquire, finance, and maintain housing.

Eligible Housing Information Services costs include:

- Helping families search for housing whether HOPWA subsidized or not;
- Providing fair housing guidance;
- Housing counseling for financing and acquiring a home; and
- Developing and using Homeless Management Information System (HMIS) elements to coordinate housing assistance for eligible households.

HMIS costs billed to housing information services must be pro-rated and not include HMIS reporting. Costs related to Homeless Management Information Systems (HMIS) for tracking housing assistance must be billed separately. The use of HMIS for reporting purposes is considered an administrative activity and must be billed to administrative costs.

### **Permanent Housing Placement Assistance (PHP)**

Funding may be used for PHP authorized under Supportive Services at 24 CFR 574.300(b)(7) in connection with the provision of housing support provided under these awards. Although PHP is included as a supportive service in the HOPWA regulations, HUD has established a dedicated BLI for PHP to distinguish it from other supportive services.

PHP funds can cover one-time costs to help households secure permanent housing, such as:

- Security deposits (up to two months of rent);
- Rental application fees, credit checks, and utility hook-up fees;
- Utility arrears and rent arrears when determined to be a barrier to establishing new permanent housing;
- Verification of household eligibility for assistance; and
- Staff time to assist with lease execution and resolving landlord issues at lease up.

PHP cannot be used for moving costs such as movers, truck rentals and packing materials or ongoing rent or utilities in already established housing.

### **Other HUD-Approved Activities**

Other housing activities not already authorized at 24 CFR 574.300(b) may be proposed under a Replacement Grant Supplemental Application subject to HUD's approval. The proposal must address the expected beneficial impact of this alternative activity in addressing housing needs of eligible households by describing the project impact and the identified performance output and household outcome measures for this activity.

Examples of previously approved Other housing activities include:

- Moving costs;
- Deep or shallow rental assistance subsidies;
- Landlord incentives; and
- Homeownership assistance.

Acquisition, new construction, or rehabilitation of housing facilities, or other activities described as ineligible in Section II.C. of this notice are not eligible as Other housing activities.

### **Supportive Services**

Funds can be used for Supportive Services to help assisted families maintain stable housing and access medical care, income, and other resources to improve housing and health outcomes.

Subject to the requirements in 24 CFR part 574, eligible Supportive Services include:

- Time spent by staff to create and update housing and service plans for assisted families;
- Time spent connecting assisted families to services and treatment based on the plans;
- Meetings between caseworkers and supervisors to ensure plans meet the family's needs;
- Health and mental health assessments;
- Outpatient mental health treatment from licensed professionals;
- Alcohol or substance use disorder services from licensed or certified professionals;
- Therapy for individuals or groups to address mental health and substance use issues;
- Nutritional services like food banks, supplements, and counseling from nutrition specialists;
- Life skills training, such as budgeting, resolving conflicts, using public transportation, and unit maintenance;
- Credit counseling;
- Education programs, including health, substance use prevention, literacy, and job training;
- Job coaching, such as resume writing assistance;
- Transportation for clients to medical care, employment, childcare, or other necessary services; and
- Transportation costs for service providers to meet with assisted families for supportive service needs.

In all cases, HOPWA grantees must ensure that HOPWA-eligible individuals and families maintain access to available healthcare benefits and are able to fully participate in their healthcare plan. HOPWA grantees should promote adherence to prescribed HIV medications, so assisted family members with HIV are able to achieve durable viral suppression and protect their immune health. Grantees and project sponsors must promote access to other needed services and benefits that are available through other resources, including healthcare assistance, AIDS drug assistance program (ADAP) under the Ryan White HIV/AIDS Treatment Extension Act of 2009, Affordable Care Act, and/or other federal, state, local, and private resources. More information on treatment as prevention and the importance of viral suppression can be accessed [here](#).

### **Administrative Costs**

HOPWA regulations (24 CFR 574.300(b)(10)) limit a grantee's administrative costs to 3 percent of the grant amount and limit each project sponsor's administrative costs to 7 percent of the amounts the project sponsor receives under the grant.

Eligible Administrative costs are expenses related to managing, overseeing, coordinating, evaluating, and reporting on approved grant activities. This includes staff time spent gathering data and preparing the HUD-4155 HOPWA Consolidated APR/CAPER form to meet annual reporting requirements.

Administrative costs do not include costs directly related to carrying out eligible activities, since those costs are eligible as part of the activity delivery costs of those activities. Accordingly, staff costs directly related to the delivery of housing assistance or supportive services activities are billable to the associated housing or supportive service BLI. Staff costs should not be billed entirely under administration or entirely to supportive services. If staff are providing services under a specific BLI (e.g., TBRA or STRMU), their staff costs should be charged to that BLI.

**Resource Identification**

Resource Identification activities may be proposed under a Replacement Grant Supplemental Application. Resource Identification funds may be used to establish, coordinate, and develop permanent housing assistance resources for low-income people with HIV.

Eligible Resource Identification costs include:

- Coordinating with local systems like Homeless Continuum of Care or Ryan White HIV/AIDS Program recipients;
- Needs assessments to inform program design; and
- Conducting research or feasibility studies on housing models for people with HIV.

HOPWA grantees and project sponsors are encouraged to coordinate with their local Continuum of Care coordinated entry system to ensure housing options are available to eligible families experiencing homelessness. In addition, coordination with local Ryan White HIV/AIDS Program recipients is encouraged to streamline resources and improve housing and health outcomes for assisted individuals.