Updated Section 3 Reporting Requirements in IDIS

Integrated Disbursement and Information System (IDIS) Release 11.23 implemented system functionality that incorporated Section 3 reporting into IDIS for the Housing Opportunities for Persons With AIDS (HOPWA) program. Section 3 requirements apply to activities that receive at least $200,000 of HUD assistance for housing rehabilitation, housing construction, and other public construction.

The Office of HIV/AIDS Housing, Office of Affordable Housing Programs, Office of Block Grant Assistance and Office of Special Needs Assistance Programs will also have guidance released on implementing Section 3 in the near future. Further guidance for the HOPWA program will be released by the Office of HIV/AIDS Housing, which administers the HOPWA program.

For HOPWA, Section 3 requirements are applicable to Facility Based Housing Subsidy Development activities that receive more than $200,000 of assistance, including those that are funded with more than one HOPWA grant year, where HUD funds total more than $200,000.

These activities are reflected in IDIS as any Facility Based Housing Development activity where the Type of Development is any of the following types, and the activity is funded with more than $200,000.

- Acquisition and New Construction
- Acquisition and Rehabilitation
- Lease with Rehabilitation
- New Construction
- Rehabilitation
- Substantial Rehabilitation

In situations where a single development project is funded with more than one grant year of HOPWA funding, grantees will have an IDIS Facility Based Housing Development activity for each grant year. Grantees should choose a single Facility Based Housing Development IDIS activity through which they will report Section 3 data. Additional guidance will be released to support grantees in choosing the correct activity for Section 3 reporting.

This functionality will begin with any HOPWA activities that meet this requirement and have an initial funding date of July 1, 2021 or later. The Section 3 updates to IDIS impact the IDIS Activity Setup Screen, which now includes the question, “Is this activity subject to Section 3?” with an option to answer “Yes” or “No.”

- Answer “Yes” when the Facility Based Housing Development activity includes over $200,000 in HOPWA funding for Rehabilitation or Construction.
- Answer “No” for all other activities, including Facility Based Housing Development activities that exceed $200,000 in total, but for which the Rehabilitation/Construction costs are less than $200,000.
For questions regarding Section 3 requirements or reporting, please visit the HUD AAQ at https://www.hudexchange.info/program-support/my-question/.

Housing is a structural intervention in ending the AIDS epidemic in the United States. Each year, HOPWA ensures housing stability for more than 100,000 American households that are low-income and living with HIV. Want to know more about HOPWA? Go to https://www.hud.gov/program_offices/comm_planning/hopwa

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