



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-26-14

Issued: 10/02/2026

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amended, superseded, or rescinded.

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

Subject: Procedural Guidance for Fiscal Year 2026 HOPWA Permanent Supportive Housing
Renewal and Replacement Grant Applications

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I. Funding Opportunity

A. Summary

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 2026 HOPWA Permanent Supportive Housing Renewal and Replacement Grant Applications

Funding Opportunity Number: CPD-26-14

Assistance Listing Number: 14.241

Key Dates:

1. Date of Publication: 10/01/2026
2. Due Date for Letter of Intent: 10/16/2026
3. Due Date for Application Submission: 11/06/2026
4. Anticipated Awards Date: 02/01/2027

Agency Contact Information: HOPWA@hud.gov

B. Purpose

This Housing Opportunities for Persons With AIDS (HOPWA) notice announces renewal and replacement grant application requirements for eligible HOPWA Permanent Supportive Housing (PSH) grants expiring between June 1, 2026, and December 31, 2027.

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 (42 U.S.C. § 12901). The Consolidated Appropriations Acts of 2024 (Pub. L. 118-42, Mar. 9, 2024) and the Full-Year Continuing Appropriations and Extensions Act of 2025 (Pub. L. 119-4, Mar. 15, 2025) provides that HUD shall renew or replace all eligible expiring HOPWA PSH grants initially funded with appropriated funds from FY 2010 or earlier provided they meet applicable program requirements.

Through this HOPWA notice, the Department of Housing and Urban Development (HUD) will renew or replace eligible HOPWA PSH grants. Renewing or replacing PSH HOPWA grants may reduce the risk of unsheltered homelessness¹, improve access to needed care², and limit the spread of HIV³. PSH grantees are required to provide access to wraparound supportive services. As part of a comprehensive approach, grantees are encouraged to provide access to those support services that will help individuals and families move toward self-sufficiency.

¹ Dasgupta, S., Beer, L., Lu, J. F., Weiser, J., Yuan, X., Nair, P., Banks, L., & Marcus, R. (2023). Needs for shelter or housing assistance among people with diagnosed HIV by jurisdiction: United States, 2015-2020. *AIDS (London, England)*, 37(3), 535–540. <https://doi.org/10.1097/QAD.0000000000003460>

² Quinn, K. G., DiFranceisco, W., Spector, A., Bendixen, A., Peters, A., & Dickson-Gomez, J. (2021). The Effect of Various Supportive Housing Models on ART Adherence Among Persons Living With HIV in Supportive Housing. *Medical care*, 59(Suppl 2), S124–S131. <https://doi.org/10.1097/MLR.0000000000001336>

³ Patterson, M. (2026). The Power of Prevention: An Analysis of Federal HIV Housing Investments. *Journal of Social Service Research*, 1–15. <https://doi.org/10.1080/01488376.2025.2597325>. Accessed 8/25/2026

Eligible applicants (see [Section II.A](#) for applicant eligibility requirements) may apply for either a three-year renewal or a replacement grant. HOPWA PSH grants are funded with HOPWA competitive funding⁴ and are not automatically renewed when the grant expires at the end of the three-year grant period of performance. Renewal Grant Applications are limited to the same distribution of funding activities and scope that are already approved under the expiring PSH grant. Grantees that wish to change the scope must submit for HUD approval a supplemental replacement grant application (see [Section III](#) for application requirements).

All eligible applicants (see [Appendix A](#)) may submit a supplemental replacement grant application. A replacement grant is defined as replacing the activities in a current PSH grant with new, eligible activities that significantly modify the program. Current grantees may choose to pursue a replacement grant for many reasons, including reflecting the current needs of the community or providing new services. Subject to HUD approval, this could include eliminating or implementing new program activities (for example, eliminating facility-based housing and implementing supportive services), changing the population served, adjusting the project's scope, adding or removing project sponsors, or altering the service area.

Applicants must provide PSH as the primary grant activity under a Fiscal Year (FY) 2026 renewal or replacement award. HUD will consider the primary grant activity to be PSH when at least 51 percent of grant funds provide PSH activities to eligible households as described in [Appendix B](#) of this notice. PSH refers to activities that provide eligible households with permanent housing and ongoing access to appropriate supportive services through qualified providers. For the purposes of this notice, "permanent housing" is defined as housing in which the eligible person has a continuous legal right to remain in the unit, established by a lease or legally binding occupancy agreement, which is renewable after the first year.

PSH activities must remain the primary grant activity for both renewal and replacement applications in FY 2026. Additionally, families receiving PSH assistance must also have ongoing access to appropriate supportive services provided through qualified service providers in the area. Tenant-Based Rental Assistance (TBRA), Operating Costs, and Leasing for PSH units are common permanent housing activities. Depending on the structure of the program and usage of leveraged funds, Short-Term Rent, Mortgage, and Utilities (STRMU), and Permanent Housing Placement (PHP) may contribute towards the percentage of grant funds providing PSH to eligible households. HUD will include both supportive services and permanent housing activities in the calculation to determine whether the applicant meets the 51 percent PSH requirement.

For this notice, the application to continue an existing HOPWA PSH renewal grant will be referred to as the "Renewal Grant Application." The supplemental application to replace existing program activities with new activities will be referred to as the "Replacement Grant Application."

⁴ For the purposes of this notice, the term "competitive funding" is used because these PSH grant awards are originally made as "Nonformula Allocations" under section 854(c)(5) of the AIDS Housing Opportunity Act (42 U.S.C. 12901 et seq). PSH grants are subject to the program requirements at 24 CFR part 574. Use of the term Competitive funding in this notice does not imply open competition for funding as only the eligible applicants listed in Appendix A may apply.

C. Program History

The following changes have been made from prior year versions of this notice.

- The period of eligible grants shifted and expanded from June through May to June through December of the following year to better align the application cycle with the fiscal year.
- Executive summary for both renewal and replacement application was expanded so applicants provide a more detailed current explanation of their program.
- Budget narratives for both renewal and replacement applications were added to allow for additional explanation of expenditures and an opportunity to explain leveraged fund usage.
- Approach narrative for renewal applications were added to allow opportunity to describe renewal projects in more depth to ensure they meet all necessary requirements.
- Rating factors for replacement applications include an increased focus on supportive services and self-sufficiency.

II. Eligibility Requirements

A. Eligible Applicants

Eligible applicants for FY 2026 HOPWA Permanent Supportive Housing (PSH) renewal or replacement grant funding are current HOPWA grantees with PSH grants that are set to expire between June 1, 2026, and December 31, 2027. See [Appendix A](#) for a list of eligible FY 2026 applicants. Applications submitted by organizations not listed as eligible in [Appendix A](#) will be considered ineligible and their applications will not be reviewed. Where HUD has awarded a replacement grant to a new grantee, the new grantee has the same right to apply for a renewal or replacement grant as the original grantee would have under this notice. Only the current official grantee of record may apply under this notice.

If HUD determines that an otherwise eligible applicant's expiring grant has a balance large enough to fund activities beyond December 31, 2027, the grant may be deemed ineligible for a renewal or replacement award under this notice. Provided that HUD has determined that the eligible grantee has a history of satisfactory performance in managing Federal awards, the grantee may request a grant extension past December 31, 2027, on their current grant in lieu of applying for a renewal or replacement grant. Grant extensions are subject to HUD approval.

B. Eligible Activities

The standards for eligible activities under the HOPWA program are outlined in the HOPWA regulations at [24 CFR part 574](#). See [Appendix B](#) for a brief description of eligible budget line items (BLI) and [Section II.C](#) below for a list of ineligible activities.

C. Ineligible Activities

The following activities cannot be funded under this notice:

1. Capital Development. Funds cannot be used for property acquisition, new construction and rehabilitation projects.
2. Health Services. Health services are ineligible if payment has been made or is expected to be made through insurance, state program, federal health benefits, or prepaid services.
 - a. HOPWA may act as a payor of last resort for health services but only for individuals with HIV, not their family members.
3. 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.
4. Personal Items and Expenses. Funds cannot cover personal items such as clothing, grooming, cash assistance, entertainment, pets, or other non-housing-related costs.
5. Emergency Shelters and Transitional Housing. Emergency shelters and transitional housing funded with the operating and leasing BLIs 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. An example of a clear connection would be funding transitional housing for eligible persons exiting incarceration to ensure no risk of homelessness as permanent housing is located.

D. Application Eligibility

Your application is considered eligible for funding if it satisfies the application review requirements in [Section IV](#) of this notice.

E. Notification of Intent

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 this published notice, instructions for completing the Project Confirmation Worksheet (PCW), Letter of Intent (LOI) deadline, and a HUD-40110-B Drafting Tool to assist you in completing your application.

Letters of Intent to apply are due by the due date listed in [Section I.A](#) to HOPWA@hud.gov.

The LOI must include the following:

1. A statement that indicates your intent to submit a Renewal Grant Application.
 - a. Renewal Grant Applications are limited to the same funding activities and scope that are already approved under the expiring PSH grant. Justification will be required if you submit a budget with fewer households or decreased leveraged resources.
2. A statement that indicates your intent to submit a Replacement Application, if applicable.
 - a. Replacement Grant Applications must demonstrate significant modifications to the original grant, potentially including new and different eligible activities. Simply requesting to serve fewer households is not a valid basis for a replacement grant.
3. Confirmation of current expenditures provided in the PCW.
4. Spenddown plan, if applicable.

5. Confirmation that remaining funds will be expended on or before December 31, 2027.

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 (OHH) at hopwa@hud.gov and your local Community Planning and Development (CPD) Representative. HUD will only consider letters received after the deadline if HUD determines that unique and extenuating circumstances prevented timely submission.

F. Project Confirmation Process

The Project Confirmation process is one of the tools we use to ensure compliance with HOPWA program requirements, communicate information regarding approved funding limits, and make sure we have the most up to date contact information for grantees and project sponsors. 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 provided below:

1. Eligible total funding amount,
2. Currently approved BLI amounts for each activity,
3. Eligible BLI amounts for the FY 2026 renewal grant,
4. Spending Analysis with data from the Integrated Disbursement and Information System (IDIS),
5. Period of performance for expiring grant,
6. Projected and achieved outputs (from the Consolidated APR/CAPER), and
7. Next steps to complete the PCW.

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 especially if there has been no drawdown in IDIS in the last 90-days. Once the information is confirmed and finalized, you should use the data from the PCW as a tool to complete your renewal or replacement applications. The eligible funding amount listed in the PCW is the maximum grant amount for either a renewal or replacement grant. 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 adjustments can be made to BLI amounts for Replacement Grant Application.

HUD will review and verify the information returned with the PCW. If HUD, in consultation with the grantee, determines that an extension beyond December 31, 2027, is necessary to fully spend the current PSH grant, you 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 grant beyond December 31, 2027.

III. Application Requirements

A. Standard Forms, Assurances, and Certifications

You must properly complete and submit with your application, the standard forms, assurances, and certifications identified below. You can also [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 application has all the required standard forms, assurances, and certifications.

Forms/Assurances/Certifications	Submission Requirement	Notes/Description
Application for Federal Assistance (SF-424)	Required with the application	File name: SF-424
Applicant and Recipient Assurances and Certifications (HUD-424B)	Required with the application	File name: HUD-424B
Applicant/Recipient Disclosure/Update Report (HUD-2880)	Required with the application and after award	File name: HUD-2880
Certification Regarding Lobbying	If applicable, required with the application	File name: Lobbying Certification form
Disclosure of Lobbying Activities (SF-LLL)	If applicable, required with the application	File name: SF-LLL
Fiscal Year 2026 HOPWA Permanent Supportive Housing Renewal and Replacement Threshold Requirement Certification Form	Required with the application	File name: Threshold Certification form

B. Budget

You must use the **HOPWA Competitive Application & Renewal of Permanent Supportive Housing Project Budget Summary** form (HUD-40110-B) to provide a clear and complete breakdown of how HOPWA funds will be used. The **Application Budget Summary** page (budget summary) must show budget and leveraged funds by each BLI. You must also include a **Detailed Project Budget & Housing Outputs** (detailed budget) page for the grantee and for each project sponsor. This page must include:

1. Activity Description
 - a. Give a brief explanation that supports the funding you are requesting for each BLI. Include number of FTE employees and a list of the specific items or activities covered under the BLI.
 - b. Please note that applications that do not provide a full description for each funded BLI will be returned for edits.
2. Household/Unit Projection

- a. Provide estimates of how many households or housing units will be assisted. Make sure the totals account for yearly attrition and show an unduplicated number of households or units supported by the grant.
 - b. Written justification is required for any decrease in projected households.
3. HOPWA Request for each BLI
 - a. List the total funding amount for each BLI. For renewal grant applications, these amounts must match the totals approved in the PCW.

You are strongly encouraged to use the HUD-40110-B Drafting Tool Spreadsheet to help you complete the HUD-40110-B form. The HUD-40110-B Drafting Tool Spreadsheet will be sent to you after the LOI and PCW processes are complete.

All funding amounts must be shown in whole dollars. Check that all amounts add up correctly and match across the budget summary page, detailed budget page(s), and budget narrative. See [Section IV.C.3](#) (renewal) and [Section IV.D.a.1.3](#) (replacement) for more details on the budget narrative and [Section II](#) for more details on eligibility requirements.

C. Narratives and Other Attachments

1. Renewal Application Narratives and Other Attachments

Document	Submission Requirement	Notes/Description
Executive Summary	Required with the application	See Section IV.C.1
Approach Narrative	Required with the application	See Section IV.C.2
Budget Narrative	Required with the application	See Section IV.C.3

2. Replacement Application Narratives and Other Attachments

Document	Submission Requirement	Notes/Description
Rating Factor Narratives	Required with the application	See Section IV.D.1

D. Format

Narratives and other attachments to your application must follow the formatting guidelines below. Do not submit password protected or encrypted files.

Double spaced 12-point (minimum) Times New Roman font on letter sized paper (8.5" x 11") with at least 1-inch margins on all sides.

All narratives should be formatted as described here. Page limits for each narrative are provided with a narrative description in [Section IV.C](#) for renewal applications, and rating factor description in [Section IV.D.1](#) for replacement applications.

- Font Size/Style for Headings: 14 point, Bold. (Subheadings – 12 point, Bold.)
- Headers: Left-justified – indicate the rating factor or executive summary.
- Footers: Left-justified – name of applicant. Right-justified – page number out of total pages. (ex. Page 1 of 5)

E. Funding Restrictions

The following funding restrictions apply to replacement 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 BLI is restricted to no more than 50 percent of the total grant award.
- The resource identification budget line is restricted to no more than 10 percent of the total grant award.

F. Submission Process

Email your grant application to HOPWA@hud.gov as one attached PDF file. The file name must indicate if it is a replacement or renewal grant application. Include all required documents in a single file, in the order shown in the tables below. Do not include a table of contents.

IV. Application Review

A. Threshold Review

All submitted applications must satisfy the threshold requirements to advance to merit review. There are six threshold requirements that are listed below.

1. System for Award Management Registration: Your organization must have a current and active SAM.gov registration and valid Unique Entity Identifier (UEI) in SAM.gov at the time of application and throughout the life of the award. You must review and update your information in SAM.gov to make sure the information is current, accurate, and complete. You must include the UEI created in SAM.gov in each application you submit to HUD to apply for funding.
2. Applicants 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 grant agreement requirements, with no significant unresolved audits or monitoring findings.
3. At least 51% of total grant funds must be used for eligible PSH activities. PSH and permanent housing are defined in Section I.B. of this notice. Please see Appendix B for a list of eligible activities including allowable supportive services.
4. Applicants must be listed as an eligible applicant in [Appendix A](#).
5. Applications must be submitted by the deadline listed in [Section I.A](#) of this notice.
6. Project applicants must affirmatively certify the following:

The project applicant will not engage in illegal racial discrimination. This is consistent with the requirements of 2 CFR 200.300(a).

The project applicant will not operate drug injection sites or “safe consumption sites” in violation of 21 U.S.C. § 856(a)(1), knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2), or knowingly distribute drug paraphernalia in violation of 21 U.S.C. § 863. This is consistent with the requirements of 2 CFR 200.300(a).

This certification is not a requirement that HOPWA-assisted individuals must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement.

B. Risk Review

Applications that meet the threshold requirements will undergo a risk assessment per 2 CFR 200.206. HUD will assess risk as outlined below using data gathered in conjunction with HUD Field Offices. Before making any awards, including renewal awards, HUD will evaluate each applicant’s likelihood of successfully carrying out the project. This assessment helps identify risks that may affect the advancement toward or the achievement of a project’s goals and objectives. Here is what HUD looks at:

Past Performance:

- Government-wide performance data, as noted in [2 CFR 200.206\(a\)](#)
- Public sources like news reports, Inspector General findings, Government Accountability Office reports, and complaints with a reasonable basis
- History of performance. The applicant’s record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, failing to make significant progress in a timely manner, failing to meet planned activities in a timely manner, conformance to the terms and conditions of previous Federal awards, and, if applicable, the extent to which any previously awarded amounts will be expended prior to future awards. HUD will not penalize a renewal or replacement applicant who sufficiently complied with the terms and conditions in prior notices that are in direct conflict with those contained herein.
- Reports from past audits, including those performed under 2 CFR part 200, subpart F—Audit Requirements
- History of finishing activities on time and using leveraged funds as proposed in the grant application and approved by HUD.
- Debarments or suspensions
- Misuse of federal funds for purposes outside of the program

Organizational Health:

- Financial stability and capacity, including compliance with cost principles in [2 CFR part 200, subpart E](#) (200.400 et seq.), and where applicable, 2 CFR Part 170
- Quality of management systems and ability to meet the management standards in 2 CFR part 200
- Ability to follow all required laws and rules
- The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities
- Capacity, including staffing structures and capabilities

Results:

- Ability to promote self-sufficiency and economic independence
- Number of people served or targeted for assistance
- Ability to produce positive outcomes and results
- History of illegal discrimination, including illegal racial discrimination
- History of subsidizing or facilitating illicit drug use or other illicit activities that conflict with the purposes of this notice.

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.

HUD in its discretion may use the results of the risk review as a sufficient and independent basis to make adverse funding decisions, including rejecting an award, applying special conditions on an award, or reducing the amount of an award.

C. Renewal Application Review

Renewal applications meeting threshold ([Section IV.A](#)) as well as the listed program and policy requirements ([Section IV.B](#)) will be conditionally awarded. HUD may require renewal applicants to correct or revise information submitted after the final FY 2026 award announcements and prior to executing the grant agreement. For a full list of renewal application requirements please refer to [Section III](#).

1. Executive Summary

The executive summary should provide a high-level summary of the project with the following components:

- a. Grantee
 - a. Grantee name
 - b. Applicant mailing address
 - c. Authorized representative name and email

- d. Program contact name and email
- b. Total award
- c. For each project sponsor
 - a. Project sponsor name
 - b. Mailing address
 - c. Executive Director's name and email
 - d. Program contact's name and email
 - e. Award amount
- d. Purpose: This should include how and where the award funds will be used. The summary should identify your project in one sentence.
- e. Activities: This should include specific housing and supportive service activities identified by BLI to be performed by grantee and each project sponsor. Include one sentence for the grantee activities and one sentence for each project sponsor's activities.
- f. Deliverables and Expected Outcomes: This should include projected annual housing outputs and align with HUD-40110-B. You should list how many households will be assisted in each BLI.
- g. Population to be Served: This should include the identified target subpopulation.
- h. Program Summary: This should include an introductory description of your project and describe the different activities of the project. Specifically, each type of supportive service offered should be described. This should be at least one paragraph. One sentence is not acceptable and will be returned for additional details.

The executive summary is limited to two pages. See [Appendix C](#) for an example.

2. Approach Narrative

The approach narrative must include an operations plan that details all grant activities, the proposed impact of funded activities, and how the grantee will leverage the larger housing and HIV care and treatment system to support assisted individuals and families. Your narrative should include:

- an overview of the types of housing activities provided,
- an explanation of the client engagement process including referral system, enrollment, service plan development and evaluation, and steps to promote self-sufficiency and housing stability,
- a description of the supportive services and assistance offered to assisted individuals and families (e.g., case management, substance use treatment, mental health treatment, and employment assistance) including those that may be leveraged, and how the grantee and project sponsors will ensure that qualified service providers in the area are able to offer adequate supportive services to participants of the program per the requirements at 24 CFR 574.310(a)(1) and 24 CFR 574.500(b)(3), and
- a description of how you and project sponsors will conduct ongoing assessments of housing assistance and supportive services for program participants per 24 CFR 574.500(b)(2).

Please be sure to note which activities (housing or supportive services) will be funded through the grant award, and which will be leveraged.

The approach narrative is limited to four pages.

3. Budget Narrative

The budget narrative must include at least one paragraph for each BLI funded by this grant or supported with leveraged resources. The narrative should clearly explain and expand on the brief explanation provided on the HUD-40110-B under the ‘Activity Description.’

For each BLI, you must list the position title and FTE equivalent. You must clearly identify the specific costs, items, or activities covered under that BLI. If a BLI is funded by both grant funds and leveraged resources, you must clearly explain how the funding is divided. For example, if you receive \$100,000 in TBRA leveraged resources, specifically express the funding source and how those funds will be utilized within the program. Likewise, for grant funding, you must clearly state whether grant funds are used entirely for client rent or if any portion is used for staffing, overhead, or other allowable expenses.

Use the budget narrative to justify any reduction in households served or any decrease in leveraged resources from the amount listed on your PCW.

Leveraged resources are funds or services provided outside this funding opportunity to support and sustain the project outlined in the application. Leveraging commitments may involve provisions of funding or services through partnerships or commitments from the applicant organization. You must include a table that clearly shows all leveraged resources that will be used to carry out your project. For each organization providing support, list the following:

- Organization name and address (state whether it is a project sponsor)
- Specific type of commitment (cash, non-cash resources, volunteer time, in-kind services, or funds), for example 35 hours per client of substance use treatment counseling.
- Dollar value of the commitment
- Funding source (federal, state, local, private, or in-kind)
- Name, title, and contact information of the organization’s authorized representative

The authorized representative for each organization providing support should be able to confirm the type and amount of that support. Leveraged funds may be used for any project-related costs, even if those costs are not eligible or budgeted under the HOPWA program. Leveraged resources may support any activity within the project.

The budget narrative is limited to one page per BLI. For example, if grant funds support TBRA and supportive services, and leveraged resources support TBRA, the narrative is limited to two pages.

D. Replacement Application Review

HUD will review the Replacement Grant Application rating factor narratives and award points for each factor as described below. A maximum of 100 points may be awarded for the Executive

Summary and rating factors. Partial points may be awarded if the applicant does not fully address the information needed for full points. Applicants receiving fewer than 60 points may be required to revise and resubmit their applications for rereview. Additional conditions may also be placed on the grant to ensure compliance with all requirements per 2 CFR 200.208.

1. Rating Factor Narratives

Rating Factor	Total Points Available
Rating Factor 1: Soundness of Approach	65
Rating Factor 2: Leveraging	15
Rating Factor 3: Achieving Results	20

a. Rating Factor 1: 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 65 points for this factor. Responses for Rating Factor 1 (RF1) are limited to a total of ten pages plus one page per BLI (described in 1.5) and will be rated on the below sub-criteria.

1.1 Executive Summary

4 points – To be awarded full points, the executive summary should provide a high-level summary of the project with the components below. See [Appendix C](#) for example.

- I. Grantee
 - a. Grantee name
 - b. Applicant mailing address
 - c. Authorized representative name and email
 - d. Program contact name and email
- II. Total award
- III. For each project sponsor
 - a. Project sponsor name
 - b. Mailing address
 - c. Executive director's name and email
 - d. Program contact name and email
 - e. Award Amount
- IV. Purpose: This should include how and where the award funds will be used. The summary should identify your project in one sentence.
- V. Activities: This should include specific housing and supportive service activities identified by BLI to be performed by grantee and each project sponsor. Include one sentence for the grantee activities and one sentence for each project sponsor's activities.

- VI. Deliverables and Expected Outcomes: This should include projected annual housing outputs and align with HUD-40110-B. You should list how many households will be assisted in each BLI.
 - VII. Intended Beneficiaries: This should include the identified target subpopulation, if applicable.
 - VIII. Program Summary: This should include an introductory description of your project and describe the different activities of the project. Specifically, each type of supportive service offered should be described. This should be at least one paragraph. One sentence is not acceptable and will be returned for additional details.
- 1.2 Provide an operations plan for the proposed project that clearly details the planned project activities to be implemented under the grant and logistics for providing assistance to HOPWA-eligible individuals and families.

26 points – Full points will be awarded based on the below sub-criteria.

- a. Type of Housing Assistance, *3 points*. To be awarded full points, the operation plan should describe all types of housing activities including a detailed and reasonable plan from referral to enrollment with timeframes for completion by number of days. Additionally, the plan should include projected number of housing units by type of housing assistance to be provided through the program by year over a 3-year period.
- b. Staffing Plans, *3 points*. To be awarded full points, the operation plan should provide detailed information on staffing plans and case load size. The staffing plan should include key staff positions, a description for each position of the main responsibilities and functions as it relates to the project, expected time commitment for this project (in FTE), and a contingency plan for turnover or absences. If there are any positions not yet filled provide a hiring plan and a timeline for filling all vacancies.
- c. Implementation Timeline, *3 points*. To be awarded full points, the operation plan must include a timeline with details describing how the newly proposed activity or activities will be fully operational within 30 days of the grant period of performance start date.
- d. Supportive Services, *3 points*. To be awarded full points, the operation plan must describe how you operationalize the requirement at 24 CFR 574.500(b)(3) to assure adequate provision of supportive services to participants in the program and the type of supportive services that will be offered to assisted individuals and families (e.g., case management, substance use treatment, mental health treatment, and employment assistance). Where appropriate, access to treatment for substance use disorder (SUD) and serious mental illness (SMI) should be provided either directly, through a project sponsor, or through written agreements with qualified service providers. Peer support services such as peer navigators, peer mentors, or coaches who have lived experience should be included where possible.
- e. Access to Services, Activities, or Employment, *3 points*. To be awarded full points, describe how the project will provide individualized services for assisted individuals families that will result in at least 20 hours per week of engagement in services activities or employment for all adults, except for those over age 62 or who is an individual with handicaps as defined in 24 CFR 8.3 or with a developmental disability as defined under 24 CFR 582.5 (examples of services or activities include case management, counseling, treatment, volunteering, work therapy, education, job training, community-building activities, etc.). Employment may contribute to the 20 hours per week of engagement.

The project description provided here does not constitute a reporting or documentation requirement.

- f. Ongoing Housing Assistance and Supportive Services Assessment, *3 points*. To be awarded full points, the operation plan should demonstrate that the proposed project includes ongoing housing assistance and supportive services assessments for each assisted family to meet the requirement at 24 CFR 574.500(b)(2). The assessment should be developed with assisted family or a surrogate and should include the services to be provided, when and how often those services will be provided, by whom all services will be provided and schedule for regularly completing the assessment. The assessment should include client goals, strategies for achieving those goals, and target dates for achievement to focus on improved health and wellness, housing stability, and, when applicable, increased employment income leading to financial stability and self-sufficiency.
 - g. Care Coordination, *4 points*. To be awarded full points, the operation plan should describe your organization's care coordination model. Care coordination should support continuity of care across service providers, including facilitated referral, and effective linkage to social services based on the individual or family's specific needs including but not limited to active linkage to childcare, vocational, educational, transportation, nutrition assistance, healthcare system navigation including facilitated referral and linkage to routine and ongoing physical healthcare, and follow-up to ensure individuals are engaged and retained in HIV care and treatment as well as assistance enrolling in benefit programs as needed (e.g., Social Security Disability Insurance and Supplemental Security Income, Temporary Assistance for Needy Families, Supplemental Nutrition Assistance Program, and prescription assistance programs). Applicants are encouraged to coordinate with local behavioral healthcare providers including Certified Community Behavioral Health Clinics (CCBHC) or Community Mental Health Centers (CMHC), as well as employment training and work opportunities including Department of Labor (i.e., Senior Community Service Employment Program, American Job Centers), where feasible, and include information about this coordination in their response.
 - h. Transition Plan, *4 points*. To be awarded full points, the operation plan must encourage self-sufficiency for eligible families receiving housing assistance during the 36-month grant period of performance. There may be families that are unable to achieve self-sufficiency due to age or disability and may require an ongoing housing subsidy. There should be a clear, feasible plan to transition assisted families into alternative permanent housing or self-sufficiency, that allows flexibility and the necessity to address varying needs of families receiving housing assistance, without any risk of homelessness or housing instability.
- 1.3 Complete the HOPWA budget form (HUD-40110-B) based on the guidance in [Section III.B](#) of this notice. If you are proposing an Other Housing Activity not already authorized at 24 CFR 574.300(b) to be approved by HUD, there must be an accompanying narrative description (maximum two pages which are not included in the page limit for RF1) specifically describing the Other Housing Activity proposed in the budget. The narrative 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. At least 20 percent of the total grant award must be used for eligible supportive services. The 20 percent allocation may be met through a combination of supportive services BLI funds and leveraged resources dedicated to supportive services.

15 points – Full points will be awarded if all budget amounts and descriptions reflect the planned activities discussed in application narratives, reflect funding amounts reasonable for the locality, and follow guidelines and requirements within this notice. If you are proposing an Other Activity to be approved by HUD, there must be a clear description of the proposed Other Activity including the project impact, the performance output, and client outcome measures, and how the funds included in the budget will be expended. Further, at least 20 percent of the total grant award must be used for eligible supportive services. The 20 percent allocation may be met through a combination of supportive services BLI funds and leveraged resources dedicated to supportive services. Eligible supportive services must be designed to improve client outcomes, promote self-sufficiency, and ensure long-term stability beyond the three-year award period.

- 1.4 Budget Narrative: The budget narrative must include at least one paragraph for each BLI funded by this grant or supported with leveraged resources. The narrative should clearly explain and expand on the brief explanation provided on the HUD-40110-B under the ‘Activity Description.’

15 points – Full points will be awarded if for each BLI, you list the position title and FTE equivalent. Specific costs, items, or activities covered under that BLI must be identified. If a BLI is funded by both grant funds and leveraged resources, you must clearly explain how the funding is divided. For example, if you receive \$100,000 in TBRA leveraged resources, state specifically what those resources go toward. Likewise, for grant funding, you must clearly state whether grant funds are used entirely for client rent or if any portion is used for staffing, overhead, or other allowable expenses. An additional page may be added to the total 10-page limit for RF1 for each BLI. For example, if grant funds support TBRA and supportive services, and leveraged resources support TBRA, a total of 12 pages is allowed for RF1. Additionally, affirm through narrative response whether your organization is a RWHAP provider and if not, the name of the local RWHAP provider your organization has an agreement with to ensure clients are referred to for HIV treatment.

- 1.5 Funds for 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 through narrative response that funds will not be used to replace any state or local funds.

b. Rating Factor 2: Leveraging

This factor evaluates the applicant’s 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 15 points for this factor.

2.1 You are strongly encouraged to support your PSH project with resources from other public or private sources. These may include existing health, social services, housing, and employment programs. Taxpayer dollars should be used efficiently, and projects are expected to leverage support whenever possible.

You must include a table that clearly shows all leveraged resources that will be used to carry out your project. For each organization providing support, list the following:

- Organization name and address (state whether it is a project sponsor)
- Type of commitment (cash, non-cash resources, volunteer time, in-kind services, or funds).
- Dollar value of the commitment
- Funding source (federal, state, local, private, or in-kind)
- Name, title, and contact information of the organization's authorized representative

The authorized representative of each organization providing support should be able to confirm the type and amount of support. Your score will be based on how much outside support you secure. The percentage of leveraged resources is calculated by comparing the total value of committed resources to the total grant amount. Stronger leveraging demonstrates responsible use of taxpayer funds and will improve your application score.

15 points – 200% or greater

12 points – 150% to 199.9%

9 points – 100% to 149.9%

6 points – 50% to 99.9%

3 points – 1% to 49.9%

c. Rating Factor 3: Achieving Results

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 20 points for this factor. Responses for Rating Factor 3 are limited to 5 pages.

3.1 Provide a clear plan for collecting client-level data and other necessary project data to produce accurate and complete HOPWA Consolidated APR/CAPER reports. You should show you have systems or processes in place to accommodate the data collection.

7 points – Full points will be awarded if you present a clear, organized plan for collecting data. Your plan should show that you are prepared to track results accurately and report them on time. You could clearly explain how you will collect, store, and manage data for each client served. This includes intake information, services provided, and outcomes achieved. Your plan must demonstrate that data will be complete, accurate, and consistent and that strong internal and external controls are in place to safeguard taxpayer dollars.

- 3.2 Provide a clear plan to monitor and evaluate the delivery of housing and services that objectively measures actual achievements against anticipated achievements. This should include a timeline of activities, benchmarks, and performance indicators and staff responsible for monitoring.

7 points – Full points will be awarded if you present a clear, results-driven plan to monitor and evaluate the delivery of housing and services. Your plan must show how you will measure actual performance against expected outcomes. You should identify specific, measurable performance indicators for housing stability, service delivery, self-sufficiency, and health outcomes, and explain how they will be tracked as well as who is responsible for tracking and monitoring. Performance indicators should be based on actions you can take (i.e., decrease number of days from initial contact to housing or refer clients for job training) not client's actions (i.e., achieve viral suppression or gain employment). You should demonstrate disciplined oversight, measurable results, and a strong commitment to accountability.

- 3.3 Describe how you will use the data to manage, monitor, and enhance the program.

6 points – Full points will be awarded if your response shows that data is reviewed regularly and used to guide decisions. You should describe how leadership and staff use data to track results, identify service gaps and performance challenges including variations in outcomes across demographic groups, age cohorts, and household types. You should show how data is used to inform programmatic adjustments such as referral and coordination practices. You demonstrate the mechanisms for incorporating client feedback into quality improvement efforts.

E. Application Deficiencies

If during the review process, HUD identifies deficiencies in the application, they must be resolved before the grant agreement 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. We suggest that any staff who participate in the application development also participate. 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 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, the applicant's grant administration capacity may be re-evaluated, and HUD may impose additional special conditions to address organizational capacity.
- Applicants 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.

Failure to meet deadlines or requirements may result in delays in funding.

F. Award Notice

Following the review process, HUD will notify applicants by email that HUD review has been completed, and they've been recommended for funding. The notification will include a copy of the applicants' final approved application which will be incorporated into the grant agreement. 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.

You'll receive a grant award letter notifying you of approval for either a renewal or replacement grant and final funding amount. Your new grant period of performance begins on the date the grant agreement is executed. 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](#) after you receive the grant award letter. OHH will ensure the grantee has adequate support to properly set up their grant and make the first drawdown in IDIS.

V. Post-Award Requirements and Administration

A. Program Implementation Expectations

You are expected to continue approved program activities throughout the grant operating period, unless otherwise approved through the grant amendment process. The start date for the new grant will be the day the grant agreement is signed by the local HUD field office director. You should coordinate with them to ensure the new grant aligns with the expiration date of the existing grant. If you experience a brief overlap in grant periods of performance due to when a grant is signed by HUD, you should make every effort to fully expend the expiring grant before incurring cost on the new renewal or replacement grant to avoid duplication on reporting forms.

You must update your project sponsor agreements prior to project sponsors conducting activities under the renewal or replacement agreement. All project sponsor agreements must reflect the most up-to-date HOPWA requirements for grantees. You should ensure that project sponsors are aware of HOPWA requirements and agree to comply with such requirements, inclusive of any new requirements put out by the federal government.

B. 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 and 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.

1. Non-approvable BLI Changes

The following are not eligible for budget amendments:

- Funding adjustments that exceed the statutory limits for administrative costs (i.e., three percent of the grant award for the grantee and seven percent for a project sponsor).
- Funding adjustments that exceed 50 percent of the total funding award for the supportive services BLI.
- 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.
- Any changes that are not within the purpose and scope of the grant.

C. 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. Accordingly, each award HUD makes under this notice 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 the Federal Funding Accountability and Transparency Act (FFATA) Sub-award Reporting System (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.

3. The recipient hereby acknowledges that HUD is in the process of implementing new grants management and reporting tools for all records pertinent to the Federal award. The recipient

agrees to report on grant performance and financial activities (including vendor and cash disbursement supporting details for the recipient and its subrecipients) using these new tools when they are released and to satisfy occasional requests for records pertinent to the federal award, consistent with the requirements for recordkeeping, access to records, and reporting laid out in 2 CFR part 200, which may be amended from time to time. HUD will work with the recipient to support its transition to the new reporting tools. HUD reserves the right to exercise all its available rights and remedies for any noncompliance with these grants management and financial reporting requirements, to include, without limitation, requiring additional or more detailed financial reports, suspension of disbursements, and all other legally available remedies, to the furthest extent permitted by law.

D. 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. IDIS accounts are deleted after 45 days of inactivity. Please ensure all employees maintain IDIS account access by logging at least once every 45 days.

To ensure 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](#).

E. HOPWA Closeout

You must ensure the timely closeout of expired grants. All financial, performance and other required reports outlined in the terms and conditions of the award must be submitted to HUD, no later than 120 calendar days after the end of the period of performance. Closeout of HOPWA grants is subject to [2 CFR 200.344](#) and [CPD-26-12](#), unless superseded by a subsequent notice or regulation.

F. 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 24 CFR 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.

2. Additional Post-Award Requirements:

- A. Awards made under this notice will not be used to engage in illegal racial discrimination, including racial preferences.

- B. Awards made under this notice will not be distributed in a way that violates or otherwise is used to interfere with constitutional protections guaranteed for speech and religious beliefs and the free exercise of religion.
- C. Awards made under this notice will not be used to fund, promote, encourage, subsidize or facilitate the use of illicit drugs.
- D. Awards made under this notice will not be used to fund any project, service provider, or organization that operates illegal drug injection sites or "safe consumption sites" in violation of 21 U.S.C. § 856, knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2), or knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863. This is not a requirement that HOPWA-assisted individuals must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement.
- E. Pursuant to [2 CFR 200.332\(b\)\(2\)](#), all agreements or contracts made with subrecipients under this notice must contain the same terms and conditions as those in the grant agreement issued by HUD. Any conflicting terms and conditions must be approved by HUD.

3. Carbon Monoxide and Smoke Alarms.

As explained in Notice FR-6469-N-01, all HOPWA grantees and project sponsors must ensure carbon monoxide (CO) alarms or detectors and smoke alarms are installed as required by 42 U.S.C. 12905(i) and (j) 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 FR-6469-N-01 for further guidance on these requirements.

4. 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 pursuant to 50.19(b)(2), (3), (11), (12), (13), and (15); 58.34(a)(1) and (2); and 58.35(b)(1), (2), (3), and (5) 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.

5. 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 assisted families 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 pre-1978 housing, the Lead Safe Housing Rule (subparts B, R, and, as applicable, F - M).

6. 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, Mar. 21, 2023), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver.

7. Severability.

If any part or provision of the grant agreement or terms of this notice are enjoined or held to be void or unenforceable in any jurisdiction, they shall be ineffective as to such jurisdiction and only to the extent of such prohibition or injunction and shall not invalidate or affect the legality or enforceability of the remaining provisions and applications of the agreement and notice. In the event the injunction of such provisions is stayed, dissolved or reversed, the full terms of the grant agreement and notice, including such provisions, will automatically become effective. This clause is self-executing and will become effective, binding, and enforceable automatically upon issuance of this notice.

8. Standard Post-award Requirements.

You must follow the applicable provisions in the [Administrative, National & Departmental Policy Requirements and Terms for HUD Financial Assistance – 2026](#):

Administrative

1. Build America, Buy America (BABA) (Sections 70901-52 of [Public Law 117-58](#); [41 U.S.C. 8301 et seq](#); and [2 CFR Part 184](#))
2. Uniform Relocation Assistance and Real Property Acquisition Policies Act ([42 U.S.C. § 4601 et seq.](#); [49 CFR part 24](#); and applicable program regulations)
3. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR part 200](#))
4. HUD requirements related to safeguarding resident/client files consistent with [2 CFR 200.303\(e\)](#)
5. The Federal Funding Accountability and Transparency Act (FFATA) ([2 CFR part 170](#))
6. Eminent Domain
7. Participation in HUD-Sponsored Program Evaluation ([12 U.S.C. 1701z-1](#); 12 U.S.C. 1702z-2; [24 CFR part 60](#); and [FR-6278-N-01](#))
8. The Freedom of Information Act (FOIA) ([5 U.S.C. § 552\(b\)](#) and [24 CFR 15.107\(b\)](#))
9. Presidential Executive Actions affecting federal financial assistance programs
 - [Executive Order \(EO\) 14332](#) (*Improving Oversight of Federal Grantmaking*)
 - [EO 14303](#) (*Restoring Gold Standard Science*)
 - [EO 14219](#) (*Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative*);
 - [EO 14218](#) (*Ending Taxpayer Subsidization of Open Borders*);
 - [EO 14202](#) (*Eradicating Anti-Christian Bias*);
 - [EO 14205](#) (*Establishment of the White House Faith Office*)
 - [EO 14182](#) (*Enforcing the Hyde Amendment*);
 - [EO 14173](#) (*Ending Illegal Discrimination and Restoring Merit-Based Opportunity*);
 - [EO 14168](#) (*Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*)
 - [EO 14151](#) (*Ending Radical and Wasteful Government DEI Programs and Preferencing*); and
 - [EO 14148](#) (*Initial Rescissions of Harmful Executive Orders and Actions*)

Civil Rights and Other Protections

10. The Fair Housing Act ([42 U.S.C. 3601-3619](#)) and Civil Rights laws (24 CFR 5.105(a))
11. Affirmatively Furthering Fair Housing (AFFH) requirements ([42 U.S.C. § 3608\(e\)\(5\)](#) and [24 CFR 5.150 et seq](#))
12. Economic Opportunities for Low-and Very Low-income Persons ([12 U.S.C. § 1701u](#) and [24 CFR part 75](#))

13. Compliance with Immigration Requirements ([8 U.S.C. § 1601-1646](#), and [Executive Order 14218](#), *Ending Taxpayer Subsidization of Open Borders*)
14. Accessible Technology requirements ([29 U.S.C. § 794d](#); [29 U.S.C. 794](#); and [42 U.S.C. 12131-12165](#) and implementing regulations at 36 CFR part 1194 (Section 508 regulations), [24 CFR § 8.6](#) (Section 504 effective communication regulations), [28 CFR part 35, subpart H](#) (DOJ Web Access Rule), and [28 CFR part 35, subpart E](#) (DOJ's Title II communications regulations))
15. Ensuring, when possible, the consideration of small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms consistent with [2 CFR 200.321](#)
16. Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with [42 U.S.C. 2000bb et seq.](#); [24 CFR 5.109](#); [Executive Order \(EO\) 14202](#), *Eradicating Anti-Christian Bias*; and [EO 14205](#), *Establishment of the White House Faith Office*
17. Accessibility for Persons with Disabilities requirements ([29 U.S.C. § 794](#) and implementing regulations at [24 CFR parts 8](#) and [100](#); [28 CFR part 35](#))
18. Applicable Violence Against Women Act (VAWA) requirements in the Housing Chapter of VAWA ([34 U.S.C. § 12491-12496](#)); [24 CFR part 5, subpart L](#); and program-specific regulations
19. Trafficking in persons ([Section 106\(g\) of the Trafficking Victims Protections Act of 2000 \(TVPA\)](#), as amended [22 U.S.C. § 7104\(g\)](#) and implementing regulations at [2 CFR part 175](#))

Environmental

20. Environmental requirements that apply in accordance with [24 CFR part 50](#) or [part 58](#); [42 U.S.C. 4321 et seq.](#)

Business Integrity

21. Conducting Business in Accordance with Ethical Standards (Code of Conduct), including [2 CFR 200.317](#), [2 CFR 200.318\(c\)](#), and other applicable conflicts of interest requirements
22. Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment ([41 U.S.C. § 3901](#) and [2 CFR 200.216](#))
23. Waste, Fraud, Abuse, and Whistleblower Protections ([41 U.S.C. § 4712](#))
24. Drug-Free Workplace ([2 CFR part 2429](#))

G. Remedies for Noncompliance

HUD may terminate all or a part of your award as described under 2 CFR 200.340 through 200.343 pursuant to the terms and conditions of your award, including, to the extent authorized by law,

- if an award no longer effectuates the program goals or agency priorities; or
- in the case of a partial termination, if HUD determines that the remaining portion of the award will not accomplish the purposes for which the HUD award was made.

HUD may also impose specific conditions on your award or take other remedies as described by 2 CFR 200.339 through 200.343, if you do not comply with your award terms and conditions.

H. Contact

Email: HOPWA@hud.gov

I. 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) and 2501-0044 (exp. 02/28/2027).

Appendix A - Eligible Applicants

Grantee Name	Expiring Grant #
Alaska Housing Finance Corp	AK-H230010
AIDS Alabama, Inc.	AL-H230002
Health Services Center, Inc	AL-H230016
Pima County	AZ-H230004
Cochise County	AZ-H230014
City and County of San Francisco	CA-H220008
City of San Jose	CA-H220010
Bernal Heights Neighborhood Center	CA-H220019
Alameda County	CA-H230012
Del Norte Neighborhood Development Corp.	CO-H230051
Resources for Human Development, Inc.	DE-H220020
City of Savannah, Project House Call	GA-H230001
City of Savannah, Daniel Flagg Villas	GA-H230006
Maui A.I.D.S. Foundation	HI-H230018
Gregory House	HI-H240055
AIDS Foundation of Chicago	IL-H230003
The Board of Trustees University of Illinois, College of Medicine	IL-H230011
AIDS Foundation of Chicago	IL-H230013
City of Chicago Public Health Dept.	IL-H240005
Lexington-Fayette Urban County Government	KY-H230019
Central MA Housing Alliance, Inc.	MA-H210052
Action, Inc.	MA-H230053
Cass Community Social Services, Inc.	MI-H240053
Clare Housing	MN-H230050
The Salvation Army	MN-H230052
Clare Housing	MN-H230055
Grace House	MS-H230056
State of Montana	MT-H230005
State of Montana - MT Department of Public Health & Human Services	MT-H240002
Harbor Homes	NH-H230007
City of Nashua	NH-H230017
Merrimack Valley Assistance Program	NH-H240052
Santa Fe Community Housing Trust	NM-H240051
Bailey House, Inc. (Stars)	NY-H240001
Oregon Health Authority	OR-H230009
Kingsport Housing & Redevelopment Authority	TN-H230057
Tarrant County	TX-H240003
Meeting the Needs of Our Community	VI-H230008
Vermont Housing and Conservation Board	VT-H230015
State of Washington	WA-H240054
Vivent Health	WI-H230054
Wyoming Department of Health	WY-H240004

Appendix B - List of Eligible Activities

The use of both renewal and replacement grant funds are subject to the eligibility requirement that at least **51 percent** of the funds under the grant must be used to provide PSH activities to eligible households, as described in this Appendix.

Tenant-Based Rental Assistance (TBRA), Operating Costs, and Leasing for PSH units are common permanent housing activities. Depending on the structure of the program and usage of leveraged funds, Short-Term Rent, Mortgage, and Utilities (STRMU), and Permanent Housing Placement (PHP) may contribute towards the percentage of grant funds providing PSH to eligible households.

Operating Costs

Funding may be used to cover operating costs for housing facilities owned or leased by the grantee or project sponsor, if the costs are necessary to house eligible families. Examples of eligible Operating Costs include:

Category	Examples/Details
Utilities	Electricity, water, gas
Property Insurance	Coverage for the facility
Minor Repairs & Upkeep	Small-scale repairs to maintain the facility
Maintenance	Indoor and outdoor facility maintenance
Contracted Services	Services hired for facility operations or maintenance
Furniture & Appliances	Items that remain with the facility
Food & Kitchen Operations	Food purchases and kitchen operations for HOPWA eligible families residing in the facility
Housing Inspections	Ensuring the facility meets HOPWA habitability standards
Income Verification	Confirming household income eligibility for assistance

Leasing

Funds can be used to lease part or all a building to provide housing for eligible households. Eligible staff time costs for leasing include verifying income, calculating rent payments, negotiating lease terms, housing inspections, and travel expenses for inspections.

For individuals or families unable to hold leases in their name, funding may be used to master lease units where the eligible families choose the units, the grantee or project sponsor leases the units and pays the full rent to the landlord, and the family pays the grantee or project sponsor the amount required by 24 CFR 574.310(d). If the landlord agrees to transfer the lease to the eligible person, the client may take over the lease to transition off master leasing. If this is part of project plans, the project should include funding or leveraged funds for both leasing and TBRA.

Funding may also be used to master lease units as transitional housing for eligible families until they are able to transition to permanent housing. For example, post-incarceration programs often lease a unit to temporarily house an eligible person returning to the community until other more permanent housing arrangements can be made. The lease is always in the organization's name. Any furniture, housing equipment, and supplies, eligible under the operating budget line item, belong to the organization and remain in the leased building or unit for the next household's use.

Tenant-Based Rental Assistance (TBRA)

Funds may be used to provide long-term rental subsidies for eligible families. Unlike leasing, TBRA allows tenants to hold their own lease. TBRA has no time limit, but HOPWA 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.

Security deposits are not covered by TBRA but may be paid through Permanent Housing Placement (PHP).

Eligible TBRA costs include:

- Verification of income and calculating rent,
- Monthly rent payments and 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.

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 families. This can cover rent, mortgage, or utility payments based on the family's specific needs. The amount of STRMU assistance provided to an eligible family should be based on that specific family's need. STRMU may include costs for taxes, insurance, or condo fees if these are part of the mortgage payment. However, taxes or fees not included in the mortgage statement are ineligible.

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.

Housing Information Services

Funds can be used for services to help eligible families find, secure, and maintain housing. This includes:

- Helping families search for housing,
- Providing fair housing guidance to prevent discrimination,
- Housing counseling for financing and acquiring a home, and
- Developing and using Homeless Management Information System (HMIS) elements to coordinate housing assistance for eligible families.

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 at [24 CFR 574.300\(b\)\(7\)](#) in connection with the provision of housing support provided under these awards and is not considered a supportive service. Funds can cover one-time costs to help families secure permanent housing, such as:

- Security deposits (up to two months of rent).
- Rental application fees, credit checks, and utility hook-ups.
- Rent or utility arrears that prevent access to new housing.
- Staff time to assist with lease execution and resolving landlord issues.

PHP cannot be used for 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 Application but are subject to HUD's approval. The proposal must address the expected beneficial impact of this alternative activity in addressing housing needs of eligible families by describing the project impact and the identified performance output and household outcome measures for this activity.

Examples include:

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

Supportive Services

Funds can be used for supportive services to help individuals maintain stable housing and access to healthcare, benefits, and other resources, subject to the supportive services requirements in 24 CFR part 574.

Examples include:

- Housing and service planning,
- Health and mental health services by licensed professionals,
- Life skills training, such as budgeting or conflict resolution,
- Job training and education programs, and
- Transportation for medical care or essential services.

Eligible supportive services costs also includes staff time to develop, update, and review individualized housing and service plans for assisted families; staff time to connect families to appropriate services and treatment in accordance with their housing and service plans and case staffing between caseworker and supervisor to ensure the housing and service plan is responsive to all the assisted family's needs; health and mental health assessment services; direct outpatient treatment by licensed professionals of mental health services; substance use disorder services provided by licensed or certified professionals; individual, family, or group therapy to address co-occurring disorders; nutritional services including food banks, nutritional supplements, and counseling by certified nutrition specialists; life skills trainings such as budgeting resources,

resolving conflict, using public transportation, unit maintenance; credit counseling; education services.

In all cases, HOPWA grantees must ensure that HOPWA-eligible individuals maintain access to available healthcare benefits and are able to fully participate in their healthcare and housing stability plan. HOPWA grantees should promote adherence to prescribed HIV medications, so eligible individuals are able to achieve durable viral suppression and protect their immune health. The program must maintain or enhance access to other needed services and benefits that are available through mainstream resources, including healthcare assistance, AIDS drug assistance program (ADAP) under the Ryan White HIV/AIDS Treatment Extension Act of 2009, mental health counseling services, substance use treatment services, Affordable Care Act, and/or other federal, state, local, and private resources. If your organization is not a Ryan White HIV/AIDS Program (RWHAP) provider, it is recommended that your organization work with a local RWHAP provider to refer clients for treatment. 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 the 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. HOPWA funds may be used for administrative costs as provided under 24 CFR Part 574, including staff costs of compiling data for and preparing the form HUD-4155, HOPWA Consolidated APR/CAPER, to meet the annual reporting requirements at the end of each operating year.

As provided in 24 CFR 574.3, staff expenses for direct service delivery should be billed under the relevant activity, not administrative costs.

Resource Identification

Resource Identification activities may be proposed under a Replacement Grant Application. Funds may be used to develop new housing resources and coordinate with local systems like Continuum of Care or Ryan White Planning Councils. HOPWA grantees are encouraged to coordinate with their local Continuum of Care coordinated entry system to ensure housing options are available to potential eligible families experiencing homelessness. Resource identification activities can include research, feasibility studies, and community needs assessments.

Appendix C - Example Executive Summary

Grantee

- Services of Support
- 111 Park Ave, St. 0126, Oakland, CA, 12329
- Authorized Rep: Jane Lewis (JLewis@sos.org)
- Program Contact: Aaron Lorde (ALorde@sos.org)
- Award Amount: \$575,000
- Activities to be performed:
 - Tenant Based Rental Assistance
 - Supportive Services
 - Permanent Housing Placement

Project Sponsor

- Faith in the Future
- 120 Fourth Street, Seattle, WA, 29291
- Executive Director: Marsha Johnson (MJohnson@faithinfuture.org)
- Program Contact: Henry Milk (HMilk@faithinfuture.org)
- Award Amount: \$200,000
- Activities to be performed:
 - Tenant Based Rental Assistance
 - Supportive Services

Purpose: To provide permanent housing, homelessness prevention, and supportive services to low-income people with HIV in communities along the west coast.

Deliverables and Expected Outcomes:

- Tenant Based Rental Assistance: 35 households
- Supportive Services: 75 households
- Permanent Housing Placement 28 households

Intended Beneficiaries: Low-income people with HIV and their families

Program Summary:

Services of Support will continue the West Coast Housing Options for Persons with HIV/AIDS project that operates in a 22-county area of the coast of California, Oregon, and Washington. In addition to providing Tenant Based Rental Assistance to 35 low-income people with HIV and their families over the course of the grant period, the program also supports Permanent Housing Placement for 28 households. Supportive services will assist 75 households with moving towards self-sufficiency through education for employment, job training skills, and budgeting. Additional supportive services will complement housing support and help assisted families achieve their health and wellness goals by providing linkage to primary health, HIV case management, substance use counseling, and mental health treatment to community providers across the 22-county area. The project is a collaborative partnership with Faith in the Future.