

Compliance

2021 HOPWA

Compliance with all U.S. Department of Housing and Urban Development (HUD) regulations, other federal regulations and policies, and all State of Florida regulations and policies are a required component of all Area 8 and Manatee HOPWA subcontracts. Sub-contractor compliance is monitored through monthly audits of at least 5% of client records. Additionally compliance is monitored through an annual onsite monitoring.

All payments related to client services are processed through the project sponsor office. Compliance with regulations is reviewed by the Program Director for each transaction. Monthly, the Finance Director reviews a selection of transactions to ensure compliance. Further, the program is monitored annually through the Florida Department of Health and as a part of the agency's annual fiscal audit.

Renting From Family Members

The HOPWA program follows all procedure as laid out in the Florida State HOPWA Program: Policies and Procedures Manual. Case Managers carefully review client living situations. Landlords are required to complete and sign the Landlord/Mortgage Holder agreement, in which they are required to disclose any relationships to the client. Landlords are also required to submit a W-9 form.

Absent from Unit Policy

The HOPWA Program follows the Florida State HOPWA Program: Policies and Procedures Manual on Justified Absence. Absences more of 30 days are not allowed except in cases of extended hospital stays or other medical-related absences. Client absences are evaluated based on reasonable accommodation following the guidelines in the Florida State HOPWA Program: Policies and Procedures Manual.

HOPWA Inventory Policy

Tagging/Cataloging

All items owned by Health Planning Council (excluding consumables, supplies, etc.) with a value over \$50, are marked with a tag. Each of those tags are numbered and maintained in a database by the Senior Accountant. The database is organized as follows:

<u>Source</u>	<u>Cost</u>	<u>Tag#</u>	<u>Item Description</u>	<u>Location/Custodian</u>	<u>Purchase Date</u>
1224	Compaq 2100 Notebook	Suite 2/Joe Smith 2/1/2006		Dell	999

A physical inventory is conducted every February verifying the location and existence of all items. The revised listing will be provided to the Chief Executive Officer by the end of February and will highlight any items that have been removed from the list.

New items are added to the inventory database and tagged at the time they are purchased.

Portable Items

Items of a portable nature such as notebooks, cell phones, pda's, etc., will be issued by the Sr. Accountant. The employee receiving the items signs a "Receipt of Company Property" form. The form is kept in the employee's personnel file and is updated whenever property is returned or issued. In the event an employee resigns or is terminated, their personnel file is reviewed to ensure that all property issued to the employee is returned.

Unallowable Expenditures

The HOPWA Program follows the Florida State HOPWA Program: Policies and Procedures Manual which is based on Federal guidance to determine which expenditures are unallowable. The following apply for unallowable costs:

- Funds cannot be used to purchase or improve land, or to purchase, construct or permanently improve any building or other facility. The project sponsor cannot pay a mortgage or pay itself rent for the use of a building that it owns.
- No direct cash payments to service clients.
- Funds cannot be used for influencing or attempting to influence members of Congress and other federal personnel.
- Funds cannot be used for foreign travel.
- Funds cannot be used to support employment, vocational, or employment readiness services.
- Funds cannot be used for direct maintenance expenses (tires, repairs, etc.) of a privately owned vehicle or any other costs associated with a vehicle, such as lease or loan payments, insurance, or license and registration fees.
- Funds cannot be used for the following activities or to purchase these items:
 - Clothing
 - Funeral, burial, cremation, or related expenses
 - Household appliances
 - Pet foods or other non-essential products

- Off-premise social/recreational activities, or payments for a client's gym membership

- Purchase or improve land; or to purchase, construct, or permanently improve (other than minor remodeling) any building or other facility
- Acquisition, rehabilitation, conversion, lease, and repair of facilities to provide housing services.
- New construction [for single room occupancy (SRO) dwellings and community residences only].
- Technical assistance in establishing and operating a community residence, including planning and other pre-development or pre-construction expenses;
- and including, but not limited to, costs relating to community outreach and educational activities regarding AIDS or related diseases for persons residing in proximity to the community residence.

Allowable Expenditures

The HOPWA Program follows the policies and procedures of the Florida State HOPWA Program: Policies and Procedures Manual regarding allowable expenditures.

The Florida State HOPWA Program provides the following HOPWA SERVICES to qualified individuals:

- Short-Term Rent, Mortgage, and Utility assistance (STRMU)
- Tenant-Based Rental Assistance (TBRA)
- Permanent Housing Placement (PHP)
- Short-term supported housing facilities (Transitional Housing)
- Resource Identification Services
- Housing Case Management
- Other Supportive Services including, but not limited to, nutritional services, mental health, drug and alcohol treatment; and assistance in gaining access to local, state, and federal government benefits and services.

Eligible HOPWA Activity (right) and type of benefit (below)	A. STRMU	B. TBRA	C. Housing Information Services	D. Permanent Housing Placement (PHP)	E. Housing Case Management as a Supportive Service
1. Rent Payments (for households with a lease)	Yes, 21 week limit	Yes	No	No	No
2. Mortgage payments	Yes, 21 week limit	No	No	No	No
3. First month's rent and security deposits; credit checks	No	No	No	Yes, for reasonable costs to move persons to permanent housing, not to exceed 2 months of rent costs, including security deposits and fees for credit checks	No
4. Utility payments	Yes, 21 week limit	Yes, if part of the rental payment	No	Yes, but only for one-time utility hookup and processing costs	No
5. Information and/or support to locate and apply for housing assistance	No	No	Yes, for costs for providing information and materials that inform clients of available housing	Yes, as support and help to complete PH applications, and eligibility screenings for tenancy or utilities for these units	Yes, such as counseling and help to develop a housing service plan to establish stable permanent housing
6. Move-in support, such as supplies, furnishings, incidental costs, and minor repairs of housing units	No	No	No	No, however programs may coordinate with leveraged resources and donations for these purposes	No
7. Other elements	No	No	No	Life skills and housing counseling on unit cleaning, maintenance and household budgeting	Help to access other benefits, such as health-care and other supportive services



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At this time, the Project Sponsor is not contracted to provide supportive services except for Case Management. These services may be available to clients through partnerships with the Department of Health at the State level.