



July 20, 2007

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RE: Request for Comments Housing Opportunities for Persons with AIDS (HOPWA) Program Forms (OMB Control Number: 2506-0133)

- a. HOPWA Competitive and Renewal of Permanent Supportive Housing Project Budget Summary (HUD-40110-B)
- b. Annual Performance Report (APR) for Competitive Grantees (HUD-40110-C)
- c. Consolidated Annual Performance and Evaluation Report (CAPER) (HUD-40110-D)

Dear Ms. Deitzer:

It is a pleasure to be given the opportunity to submit comments regarding the Housing Opportunities for Persons with AIDS (HOPWA) Program. The comments enclosed with this letter are the combined comments of national HOPWA technical assistance providers, as well as, national AIDS housing advocates.

The enclosed comments are provided and are based on the collective national experience of working in partnership with HOPWA grantees and project sponsors. The suggestions provided are based on this experience and are made to further streamline reporting, clarify program issues for grantees, and to further enhance the reporting tools available to grantees. In making these comments available to HUD, it is our goal that HOPWA performance outcomes will be accurately and efficiently reported and will demonstrate the effectiveness of the program nationally.

The enclosed joint comments represent comments from the following organizations:

National AIDS Housing Coalition (NAHC)

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We are pleased to provide these comments to HUD to further improve the program. If you require additional information or clarification, please feel free to contact any of the organizations listed above.

Sincerely,



Russell L. Bennett
Executive Director

Cc David Vos
William Rudy

I. Comments on HOPWA Competitive and Renewal of Permanent Supportive Housing Project Budget Summary (HUD-40110-B)

a. Application Budget Summary (all applicants)

i. Page 2, item 6 Tenant-based rental assistance.

Comment: It is unclear if this activity also includes project-based rental assistance (PBRA).

Suggested Action: PBRA should be added to this line item or a new line item should be created.

ii. Page 2, new item:

Comment: Technical Assistance as related to community residence is not included in the budget form, however it is an eligible activity in the HOPWA regulations.

Suggested Action: Below resource identification add a line item for technical assistance related to community residences as outlined in the HOPWA regulations.

b. Detailed Project Budget and Housing Outputs (each organization)

i. Page 3, add new item.

Comment: Technical Assistance as related to community residence is not included in the budget form, however it is an eligible activity in the HOPWA regulations.

Suggested Action: Below resource identification add a line item for technical assistance related to community residences as outlined in the HOPWA regulations.

II. Comments on HOPWA Annual Progress Report (APR) Measuring Performance Outcomes (HUD-40110-C)

a. Part 1: Grantee Information - Section 2, page 2 – Contractor/Subcontractor Information

Comment: The information requested in this section is similar to information requested in Part 5A: Summary of Project Sponsor Information, however clarification has not been made as to why the two are distinct. It would seem information collected under Part 5A would be provided to the grantee and reiterating such information in Part I is burdensome to grantees. Additionally, the use of the terms “contractors” and “subcontractors” are not clear and should be further defined as they relate to the HOPWA program. For example, it is unclear if project sponsor organizations are also contractor or subcontractors and thus must complete the form.

Suggested Action: 1) Clarify the relation to Part I: Contractor/Subcontractor Information to Part 5A: Summary of Project Sponsor Information and 2) Define the terms contractor and subcontractor as it relates to the HOPWA terms grantee and project sponsor.

b. Part 2: Grantee Narrative and Performance Assessment

i. C. Barriers and Recommendations (Page 3)

Comment: To gain better clarity on community barriers that often impact the delivery of or access to permanent housing, add additional barriers often faced within a community.

Suggested Action: Add the following barriers to the list presented: 1) criminal history 2) credit history 3) rental history 4) housing affordability and 5) other barrier, with the option to explain further.

ii. F. Unmet Housing Need: Assessment of Unmet Need for HOPWA Eligible Households. (Page 4)

Comment: The inclusion of the chart to identify unmet housing needs is a positive step towards creating a national picture of the HIV/AIDS housing need. The note in the instructions to this section, limits the completion of the chart to grantees providing housing in non-formula areas. To create a national picture of HIV/AIDS need, HUD should consider expanding this requirement to all grantees regardless of the service area they target.

Because needs assessment processes vary from community to community, it is important to understand the methodology utilized to collect and analyze data, as

well as, give an understanding of the community process used to prioritize such data.

Suggested Action:

- i. Change the instructions to require this chart for all grantees, not just grantees serving non-formula areas.
 - ii. Include a narrative section for grantees to describe their methodology for collecting data, as well as, provide additional information on unmet housing need within their area.
- c. Part 3: Summary Overview of Grant Activities (page 7), B. Budget and Grant Sources for Leveraging.

Comment: This section is much clearer and will be easier for grantees to report as compared to the current APR. The instructions to this section include collecting information on “in-kind” contributions. In the current version of the APR, leveraged sources are limited to cash resources. The inclusion of in-kind resources requires further clarification to aid grantees in understanding the meaning of in-kind resources, how to value these resources, and where to report these resources. The current chart (2. Sources of Leveraging) does not provide a space to capture in-kind resources.

Additionally, the classification of cash resources as federal, state, or local resources is not consistently applied. Some grantees report any source that originates from a federal agency as a federal source, where other grantees determine the source depending upon where the contract for the funds is held. For example, if a grantee has a contract with a state agency the source of funds would be considered state resources even if the federal government provided the funds. HUD should provide clarity on how to distinguish between federal, state, and local resources.

Suggested Actions:

- i.* Define in-kind resources. Include within the definition examples of in-kind resources and a method for determining the value of in-kind resources.
- ii.* Include a space within the chart (2. Source of Leveraging) to report on in-kind resources.
- iii.* Define how federal, state, or local resources are to be defined. Examples might include: Defined by their original source (i.e. CDBG funds given to state agency which contacts with grantee, funds would be considered federal) or defined by the entity that holds the contract with the grantee (i.e. state agency contracts with grantee for CDBG funds, because the grantee contracts with a state agency these funds would be considered state funds).

- d. Part 3: Summary Overview of Grant Activities, C. Performance and Expenditure Information (page 8-9)

Comment: It is unclear where to report scattered-site leasing programs in the provided form or any leasing programs for housing facilities.

Supportive services reporting (page 9, row 9) combines supportive service spending regardless of whether it is combined with HOPWA funded housing. This may be confusing to grantees, since in Part 5: Summary of Project Sponsor Information (pages 16 and 22) supportive services are separated into supportive service in conjunction with HOPWA funded housing and supportive services only. This same division should be provided in the grantee section to reduce confusion and errors in reporting.

Additionally, in row 13 of the chart, resource identification and technical assistance are combined and should be separated into two rows as these are two distinct HOPWA activities in the HOPWA regulations.

Suggested Actions:

- i.* HUD should clarify how units supported through scattered-site leasing programs should be reported. Possible clarification can be given to report such units under “2a: Households in permanent housing facilities” or “2b: Households in transitional/short-term facilities” Housing of the performance and expenditure chart. Additionally, clarification to the term “operating subsidies” should be given to state that operating subsidies including operating costs or leasing costs supported through HOPWA funds.
 - ii.* Additionally, on the row for adjustment for duplication, between rows 4 and 5 – black out the box in column 2. An adjustment for duplication in expended HOPWA funds is not needed. Similarly, black out the box between row 11 and 12 in column 2.
 - iii.* For supportive services reporting (page 9, row 9), create an additional row to separate supportive service reporting into two areas to be consistent with project sponsor reporting. Create: 1) Row 9a. - Supportive Services in conjunction with HOPWA funded housing assistance and 2) Row 9b. - Supportive Services only.
 - iv.* Create an additional row after row 13 and include technical assistance related to community residences in this row. This will create a separate and distinct reporting line consistent with the HOPWA regulations. Strike the reference to technical assistance in row 13.
- e. Part 4: Summary of Performance Outcomes, Section 1: Housing Stability Outcomes (page 10)

Comments: Overall the chart is an improvement over previous versions. HUD should clarify how grantees should report leased housing units, especially those units leased in a scattered-site model.

Suggested Actions:

- i.* Clarify reporting of leased units, especially scattered-site units. These units could be reported under “permanent supportive housing facilities” or “transitional/short-term support facilities,” whichever term applies.
 - ii.* Please note in the instructions to this chart, that columns 2 (Number of Households Continuing) and 3 (Exited Households) summed will equal the total households reported in column 1.
 - iii.* Under B. Transitional Housing Assistance (last two rows of chart, page 10), in Column 3 the term “Other Temporary Housing” (item 2) is used. The addition of the word “other” does not offer added clarity, rather it seems more confusing. It is recommended to delete the word “other” and simply have the item title be “Temporary Housing.” Delete the asterisk behind the statement.

- f. Part 4: Summary of Performance Outcomes, Section 2: Prevention of Homelessness: STRMU Outcomes (page 11)

Comments: This chart is an improvement over previous additions and provides a clear way to report client accomplishments related to STRMU. The chart clearly identifies clients’ housing status with specific outcomes.

The chart is hard to read and may cause some problems to grantees completing the form. The chart should be made easier to read and specific locations for data input should be identified.

Suggested Actions:

- i.* In the example provided for “Maintain private housing without subsidy” (row 1, column 2), it is suggested that the example be made more positive. The following are suggested changes:

(e.g. Assistance provided/completed and client is stable, not likely to seek additional support)

- ii.* It is suggested that an additional row be added to the listing of options for stable/permanent housing (PH) to accommodate individuals that may move from the STRMU assisted private unit into another non-assisted private unit. The recommendation is to add the following as an option:

Other Private Housing without subsidy

The above option would include individuals that move in with family or friends to gain additional care or support and expect to live in the unit for greater than 90 days. Also the option could be used when a client moves to a more affordable non-assisted private unit. Including this option will clearly identify those tenants

that stay in the STRMU assisted unit from clients that move to other private housing situations because of case management intervention.

- iii. In the title for column 3 (page 11) “HOPWA Client Outcomes*,” delete the asterisk.
- iv. In the fifth row, “Likely to maintain current housing arrangements*,” delete the asterisk and pull the additional information into the box. Suggested wording:

Likely to maintain current housing arrangements, with additional STRMU assistance.

- v. To aid in reporting, make the chart easier to read by:
 - i. Divide column 2, Assessment of Housing Status into two columns. The wording for the row should be in the first column and the second column should be used by grantees to report households assisted; and
 - ii. In questions 1a and 1b on STRMU assistance provided in previous years, add a box to report numbers or divided the rows into two columns. One column would contain the question as listed. The second column would provide space for the grantee to report the number of households assisted.
- vi. For question B. Assessment of Households that Received STRMU Assistance and Access to Care, delete this question. The information is collected later in the report and is redundant.

g. Part 4: Summary of Performance Outcomes, Section 3: Access to Care and Support (Page 12)

Comments: The chart is clearer than previous versions. Requiring reporting on households served over the operating year will be easier for grantees than the previous two points-in-time reporting.

Suggested Actions:

- i. In Chart 1A, row 1 it should be clarified that a housing plan should be created for clients receiving STRMU. The outcome could read as follows: 1. Has a housing plan for maintaining or establishing stable on-going housing (includes STRMU assistance).
- ii. In outcome 3, separate this outcome on primary healthcare and medical insurance into two separate outcomes. Suggested reading:

Outcome 3. Has contact with a primary health care provider consistent with the schedule specified in client’s individual service plan. Outcome indicator: Access to Health Care.

*Outcome 4. Has accessed and can maintain medical insurance/assistance.
Outcome indicator: Access to Health Care.*

- iii. Add an additional outcome to measure access to support. The suggested outcome will help to measure client engagement with case management outside of primary health care. Such case management would include access to additional social supports including life skills (i.e. budgeting), transportation, child care etc. Such supports are necessary to maintaining housing stability.

Outcome 5. Has contact with case manager, benefits counselor, or housing counselor consistent with the schedule specified in client's individual service plan. Outcome indicator: Access to Support.

- iv. Repeat the Sources of Income and Sources of Medical Insurance charts listed on page 13 on page 12. Some grantees may not complete both sections and including such information on both pages will ease grantee reporting. If this is done, delete the note in the instructions that states: For information on types and sources of income and medical insurance/assistance, refer to Charts 2C and 2D on page 13.

- h. Part 5: Summary of Project Sponsor Information, B. Summary of all Supportive Services (Page 16)

Suggested Actions: In the instructions to this section, edit to clarify that project sponsors should report on activities that they deliver through HOPWA funds, as well as, activities delivered through contracts with third parties through HOPWA funds. Insert the suggested wording as underlined: *Provide the (unduplicated) total of all households and expenditures for supportive services, housing placement, and grant administration and other activities provided or administered by the project sponsor...*

The following changes in the chart are recommended for clarity in reporting:

- i. Move row a. *TOTAL Supportive Services Provided* under row o. *Other* to be consistent with other sections of the chart. After moving row a., insert a row between row o. *Other* and the Total Supportive Services row to include a row for *Adjustment for Duplication*, similar to other sections of the chart. This row is necessary as individuals may receive multiple supportive services.
- ii. In the newly added *Adjustment for Duplication* row, in the second Column *Amount of Funds Expended by Project Sponsor*, black out the box, as it will not be needed.
- iii. Note in the instructions to this chart, that the numbers reported in this section will correspond to the totals reported in the grantee section, page 9, row 9.
- iv. In row R. *Total Housing Placement Assistance*, change the following: *(unduplicated, total rows 16+17)* edit to read *(unduplicated, total rows [enter corresponding letters])*.

- v. Under the *Housing Placement Assistance Categories*, in the row for *Adjustment for duplication*, second column for reporting HOPWA expenditures, black out this box. HOPWA expenditures will not have to be unduplicated.
 - vi. Insert a new row under row s. Resource Identification to allow for reporting of Technical Assistance as related to community residences as outlined in the HOPWA regulations.
- i. Part 5: Summary of Project Sponsor Information, C. Housing Assistance and Supportive Services (page 18)

Suggested Actions:

- i. Requested change in terminology used in Section 1. Tenant-based rental Assistance (TBRA), row b. *Rental Assistance (RA) program using a reduced subsidy, as approved in the grant agreement.* It is suggested that such terminology not be used as this may be confusing to grantees. Further it suggests that the option of providing rental assistance with reduced subsidies is an activity currently supported by HUD and new grantees could seek HUD approval to undertake this activity. Suggested options include: 1) delete this row and include within the instructions to this section that grantees undertaking any rental assistance program report under row a. Tenant-based rental assistance; or 2) rephrase the wording in row b. to read *Other Approved Rental Assistance Programs.*
 - ii. Row d. *Total TBRA Supportive Services*, collects information already reported in other sections of the report. Delete this row from the chart.
 - iii. In section 2. Short-Term Rent, Mortgage and Utility Assistance (STRMU), row b. *Total STRMU assistance to homeowners (mortgage and/or utility)*, edit the wording to read as follows: Of the above, total STRMU assistance to homeowners (mortgage and /or utility).
 - iv. Row c. *Total STRMU Supportive Services*, collects information already reported in other sections of the report. Delete this row from the chart.
- j. Part 5: Summary of Project Sponsor Information, D. Facility-based Housing Assistance and Supportive Services. (Pages 19-21)

Comments: Overall the instructions for this section are confusing and it is unclear which sections have to be completed for each facility. The separation of facilities into short-term, transitional, or permanent is repeated throughout this section which creates added reporting burdens and confusion. For example in pages 19-21, project sponsors are asked to define if their projects are short-term, transitional, or permanent housing facilities in each section. Streamlining facility-based reporting by requiring pages 19-21 to be completed for each facility would reduce redundancy, ease reporting, and increase accuracy in reporting.

Suggested Actions:

- i. Edit instructions to this section to require completion of D. Facility-based Housing Assistance and Supportive Services (pages 19-21) for each facility being developed or supported through HOPWA funds.
 - ii. If HUD required this section for each facility, the reporting on a facility as short-term, transitional, or permanent could be completed on page 19 and would be consistent throughout the remainder of this section (pages 20-21). Thus all references to short-term, transitional, and permanent housing should be deleted.
 - iii. On page 20, the chart of housing facility types should be modified. Delete the following: c. *Short-term or transitional housing facility*, as the type of facility is reported on page 19. The suggested listing may read as:
 - a. Single room occupancy dwelling
 - b. Community residence
 - c. Units leased by project sponsor
 - d. Project-based rental assistance units
 - e. Other housing facility. Specify
 - iv. In the definitions section to the APR, it is recommended that HUD provide a definition for community residence and housing facilities, as these are two different housing scenarios. To ensure accurate reporting from HOPWA grantees, these terms should be defined and related to the HOPWA regulations.
 - v. Section 3a and 3b that capture expenditure data on housing facilities, these two charts could be combined into one chart as the separation of permanent housing and short-term/transitional is not needed, as it is reported on Page 19.
 - vi. In the new chart, on row e. *Adjustment to eliminate duplication*, in the second column, *Total HOPWA funds expended*, black in the box as expenditures will not need to be unduplicated.
 - vii. Delete row g. *Total Facility-based Supportive Services*, as this duplicates information collected in other sections of the report.
- k. Part 5: Summary of Project Sponsor Information, E. Supportive Services ONLY (page 22)

Suggested Actions: Make edits as suggested above. See comments on Part 5: Summary of Project Sponsor Information, B. Summary of all Supportive Services (page 16).

- l. Part 6: Worksheet – Determining HOPWA Outcomes (page 25).

Suggested Actions:

- i. Delete Chart 2. STRMU Prior Year Assessment. The chart does not offer any other benefit to grantees as a tool and repeats requested information in the required chart on page 11 of the APR.
- ii. In the definition of Temporary Housing (page 25), delete the reference to “other temporary housing” as this is no longer needed per the edits made above.
- iii. Clarify or delete reference to Tenure Assessment (page 26), as it does not refer to the worksheet on the previous page.
- iv. Delete STRMU Prior Year Assessment instructions (page 26) as this chart is now deleted, per i. above.

III. Comments on Consolidated Annual Performance and Evaluation Report (CAPER) (HUD-40110-D)

- a. Part 1: Grantee Executive Summary - Sections 2 & 3, page 3 – Contractor/Subcontractor Information

Comment: The use of the terms “contractors” and “subcontractors” are not clear and should be further defined as they relate to the HOPWA program. For example, it is unclear if the contractor form (section 3) applies to both contracts between grantees and contractors and contracts between project sponsors and contractors. Additionally, the instructions state that the form should be completed for organizations holding a contract with grantees, project sponsors, or other organizations. The term “other organizations” should be defined.

Suggested Action:

- i. Define the terms contractor and subcontractor as it relates to the HOPWA terms grantee and project sponsor.
 - ii. Define the term “other organization” as it relates to contracts and subcontracts.
 - iii. Separate sections 2 & 3, Project Sponsor Information and Contractor Information onto different pages. Since multiples of each document may be submitted, separating the forms on to different pages will ease grantee reporting.
 - iv. Include in Section 3. *Contractor Information Form*, the grantee or project sponsor organization name so contract information can be tied back to the contracting organization.
- b. Part 1: Grantee Executive Summary - Narrative , C. Barriers and Trends Overview (page 4)

Comment: To gain better clarity on community barriers that often impact the delivery of or access to permanent housing, add additional barriers often faced within a community.

Suggested Action: Add the following barriers to the list presented: 1) criminal history 2) credit history 3) rental history 4) housing affordability and 5) other barrier, with the option to explain further.

- c. Part 1: Grantee Executive Summary, D. Unmet Housing Needs (page 5)

Comment: Because needs assessment processes vary from community to community, it is important to understand the methodology utilized to collect and analyze data, as well as, give an understanding of the community process used to prioritize such data.

Suggested Action: Include a narrative section for grantees to describe their methodology for collecting data, as well as, provide additional information on unmet housing need within their area.

d. Part 2: Sources of Leveraging (page 6)

Comment: This section is much clearer and will be easier for grantees to report as compared to the current CAPER. The instructions to this section include collecting information on “in-kind” contributions. In the current version of the CAPER, leveraged sources are limited to cash resources. The inclusion of in-kind resources requires further clarification to aid grantees in understanding the meaning of in-kind resources, how to value these resources, and where to report these resources. The current chart (Sources of Leveraging) does not provide a space to capture in-kind resources.

Additionally, the classification of cash resources as federal, state, or local resources is not consistently applied. Some grantees report any source that originates from a federal agency as a federal source, where other grantees determine the source depending upon where the contract for the funds is held. For example, if a grantee has a contract with a state agency the source of funds would be considered state resources even if the federal government provided the funds. HUD should provide clarity on how to distinguish between federal, state, and local resources.

Suggested Actions: 1) Define in-kind resources. Include within the definition examples of in-kind resources and a method for determining the value of in-kind resources; 2) Include a space within the chart (Source of Leveraging) to report on in-kind resources; 3) Define how federal, state, or local resources are to be defined. Examples might include: Define funds by their original source (i.e. CDBG funds given to state agency which contacts with grantee, funds would be considered federal) or defined by the entity that holds the contract with the grantee (i.e. state agency contracts with grantee for CDBG funds, because the grantee contracts with a state agency these funds would be considered state funds).

e. Part 3: Accomplishment Data – Planned Goal and Actual Outputs (page 7)

Comment: It is unclear where to report scattered-site leasing programs in the provided form or any leasing programs for housing facilities.

Supporting services reporting (page 7, row 10) combines supportive service spending regardless if it is combined with HOPWA funded housing. This may be confusing to grantees, since later in the CAPER supportive service accomplishments are divided based on connection to HOPWA funded housing (pages 10 and 11). This same division should be provided in the chart provided on page 7 to reduce confusion and errors in reporting.

Additionally, in the chart, technical assistance as related to community residences is not included as an available line item even though it is an allowable expense in the HOPWA regulations.

Suggested Actions: HUD should clarify how units supported through scattered-site leasing programs should be reported. Possible clarification can be given to report such units under “2a: Households in permanent housing facilities” or “2b: Households in transitional/short-term facilities” Housing of the performance and expenditure chart. Additionally, clarification to the term “operating subsidies” should be given to state that operating subsidies include operating costs or leasing costs supported through HOPWA funds.

For supportive services reporting (page 7, row 10), create an additional row to separate supportive service reporting into two areas to be consistent with charts on pages 10 & 11. Insert: 1) Row 10a. - Supportive Services in conjunction with HOPWA funded housing assistance; 2) Row 10b. - Supportive Services only; 3) insert row 10c. Total Supportive Services.

Create an additional row after row 15 and include technical assistance related to community residences in this row. This will create a separate and distinct reporting line consistent with the HOPWA regulations.

f. Part 4: Summary of Performance Outcomes, Section 1: Housing Stability (page 8)

Comments: Overall the chart is an improvement over previous versions. HUD should clarify how grantees should report leased housing units, especially those units leased in a scattered-site model.

Suggested Actions:

- i. Clarify reporting of leased units, especially scattered-site units. These units could be reported under “permanent supportive housing facilities” or “transitional/short-term support facilities” whichever term applies.
- ii. Please note in the instructions to this chart, that columns 2 (Number of Households Continuing) and 3 (Exited Households) summed will equal the total households reported in column 1.
- iii. Under B. Transitional Housing Assistance – in Column 3, row 2. “Other Temporary Housing.” The addition of the word “other” does not offer added clarity, rather it seems more confusing. It is recommended to delete the word “other” and simply have the item title be “Temporary Housing.” Delete the asterisk behind the statement.
- iv. In the instructions to this section which reads: *Note: Refer to the destination codes that appear in Part 6: Appendix: Worksheet on Determining HOPWA Outcomes and Connections with HMIS.* Edit to read: *Note: Refer to the ~~destination~~ housing stability codes that appear in Part 5: Worksheet - Determining Housing Stability Outcomes.*

g. Section 2: Prevention of Homelessness: STRMU Outcomes (page 9)

Comments: This chart is an improvement over previous additions and provides a clear way to report client accomplishments related to STRMU. The chart clearly identifies clients' housing status to specific outcomes.

The chart is hard to read and may cause some problems to grantees completing the form. The chart should be made easier to read and specific locations for data input should be identified.

Suggested Actions:

- i. Column 2, row 1 – Maintain private housing without subsidy – delete asterisk.
- ii. In the example provided for “Maintain private housing without subsidy” (row 1, column 2), it is suggested that the example be made more positive. The following are suggested changes:
 1. *(e.g. Assistance provided/completed and client is stable, not likely to seek additional support)*
- iii. It is suggested that an additional row be added to the listing of options for stable/permanent housing (PH) to accommodate individuals that may move from the STRMU assisted private unit into another non-assisted private unit. The recommendation is to add the following as an option:

Other Private Housing without subsidy

The above option would include individuals that move in with family or friends to gain additional care or support and expect to live in the unit for greater than 90 days. Also the option could be used when a client moves to a more affordable non-assisted private unit. Including this option will clearly identify those tenants that stay in the STRMU assisted unit from clients that move to other private housing situations because of case management intervention.
- iv. In the fifth row, “Likely to maintain current housing arrangements*,” delete the asterisk and pull the additional information into the box. Suggested wording:

Likely to maintain current housing arrangements, with additional STRMU assistance.
- v. To aid in reporting, make the chart easier to read by:
 - a. Divide column 2, Assessment of Housing Status into two columns. The wording for the row should be in the first column and the second column should be used by grantees to report households assisted; and
 - b. In questions 1a and 1b on STRMU assistance provided in previous years, add a box to report numbers or divided the rows

into two columns. One column would contain the question as listed. The second column would provide space for the grantee to report the number of households assisted.

- vi. For question B. Assessment of Households that Received STRMU Assistance and Access to Care, delete this question. The information is collected later in the report and is redundant.
- h. Section 3: Access to Care and Support (Page 10 & 11) - comments apply tables 1A, 1B, 2A, & 2B

Comments: The chart is clearer than previous versions. Requiring reporting on households served over the operating year will be easier for grantees than the previous two-points in time reporting.

Suggested Actions:

- i. In Chart 1A, row 1 it should be clarified that a housing plan should be created for clients receiving STRMU. The outcome could read as follows: 1. Has a housing plan for maintaining or establishing stable on-going housing (includes STRMU assistance).
- ii. In outcome 3, separate this outcome on primary healthcare and medical insurance into two separate outcomes. Suggested reading:

Outcome 3. Has contact with a primary health care provider consistent with the schedule specified in client's individual service plan. Outcome indicator: Access to Health Care.

Outcome 4. Has accessed and can maintain medical insurance/assistance. Outcome indicator: Access to Health Care.

- iii. Add an additional outcome to measure access to support. The suggested outcome will help to measure client engagement with case management outside of primary health care. Such case management would include access to additional social supports including life skills (i.e. budgeting), transportation, child care etc. Such supports are necessary to maintaining housing stability.

Outcome 5. Has contact with case manager, benefits counselor, or housing counselor consistent with the schedule specified in client's individual service plan. Outcome indicator: Access to Support.

- iv. Repeat the Sources of Income and Sources of Medical Insurance charts listed on page 11 on page 10. Some grantees may not complete both sections and including such information on both pages will ease grantee reporting. If this is done, delete the note in the instructions that states: For information on types and sources of income and medical insurance/assistance, refer to Charts 2C and 2D on next page.

i. Part 5: Worksheet – Determining Housing Stability Outcomes

Suggested Actions:

- i. Delete Chart 2. STRMU Prior Year Assessment. The chart does not offer any other benefit to grantees as a tool and repeats requested information in the required chart on page 9 of the CAPER.
- ii. In the definition of Temporary Housing (page 12), delete the reference to “other temporary housing” as this is no longer needed per the edits made above.
- iii. Clarify or delete reference to Tenure Assessment (page 13), as it does not refer to the worksheet on the previous page.
- iv. Delete STRMU Prior Year Assessment instructions (page 13) as this chart is now deleted, per i. above.