

Office of Inspector General City of Jacksonville, Florida



Investigation
STRMU HOPWA Program 2023-2024 Cycle
2025-0000030

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Inspector General

Executive Summary

In April 2025, Kysha Munn, a Program Manager for the City of Jacksonville's Neighborhoods Department, met with the Office of Inspector General (OIG) to discuss the Housing Opportunity Program for People with HIV and AIDS (HOPWA) Short-Term Rent, Mortgage, and Utility Assistance (STRMU) program.

Munn explained that the STRMU HOPWA program provides eligible recipients with up to 21 weeks of financial assistance for rental payments, mortgages, and utility costs. However, it was discovered that some recipients had exceeded the 21-week limit established per STRMU HOPWA guidelines. Munn became aware of this issue during a monthly 2023-2024 STRMU HOPWA cycle meeting amongst the service providers. Munn expressed that these issues arose from the lack of a reliable tracking system. In February 2025, the Neighborhoods Department implemented new measures to prevent this issue by requiring service providers to utilize the Homeless Management Information System (HMIS).¹

The OIG conducted a program review of the 2023-2024 STRMU HOPWA cycle for the fiscal year of October 1, 2023, through September 30, 2024. The primary objective of the review was to propose actionable recommendations for enhancing the program's procedures, to ensure that recipients cannot circumvent the process and that the assistance is allocated effectively to those in need. In addition, the focus was on identifying recipients who violated the program guidelines, identifying avoidable costs, and verifying whether their actions impacted program efficacy and the community served.

Background

COJ has signed a grant agreement with the Department of Housing and Urban Development (HUD) under Federal Grant Award No. FLH22F001 and CFDA No. 14.241. This agreement designates funds for the HOPWA program to provide housing assistance and supportive services for individuals living with HIV/AIDS and their families. The bill appropriates \$3,028,862.00 in annual grant funds from HUD for the HOPWA program.

According to the allocations and approvals specified in Ordinance 2023-338-E, the COJ Neighborhoods Department oversees the HOPWA program. The service providers involved in administering and implementing the STRMU HOPWA program are Catholic Charities, Lutheran Social Services, the Northeast Florida AIDS Network, and JASMYN (Service Providers).

Allegations, Governing Directives, and Findings

Allegations:

¹ HMIS – Homeless Management Information System - HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness.

Recipients went beyond the 21-week limit established by HOPWA guidelines.

Governing Directives:

**HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)
Short-Term Rent, Mortgage, and Utility (STRMU) Assistance HOPWA Housing**

1.3 HOPWA Program and STRMU Assistance

The objective of the HOPWA program is to address the housing needs of low-income persons living with HIV/AIDS and their families. STRMU is one type of HOPWA housing assistance. The goal of STRMU assistance under the HOPWA program is to provide short-term, stabilizing interventions to HOPWA-eligible households experiencing a financial crisis as a result of their HIV/AIDS health condition or a change in their economic circumstances.

STRMU assistance is a preventive housing intervention designed to reduce the risks of homelessness. When utilized in conjunction with other HOPWA efforts, including access to healthcare services, case management, benefits counseling, and employment or vocational services, it works to stabilize assisted households.

3.7 Fraudulent Information

Providing false information to the government when applying for "federal public benefit programs" is unlawful; for more information, see Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801-3812.

7. Waivers

7.1 Waiver Requests

Waivers of the time-limited 21-week eligible STRMU period may be granted by HUD for a period of one year for an individual household. Waivers are subject to approval by the Assistant Secretary for Community Planning and Development (CPD) and the concurrence of the Office of General Counsel (OGC).

Waiver requirements are found in the regulations at 24 CFR 574.330(a)(2). HUD may waive, as it determines appropriate, the STRMU time limitations based on the grantee's or project sponsor's good faith effort to provide permanent housing or housing in a living environment suitable for the client's health or social needs. However, since grantees can make use of rental assistance under 24 CFR 574.300(b)(5) in lieu of continuing short-term assistance, a waiver of the term limit should only be requested in special circumstances and not for reasons of administrative convenience.

Findings

The OIG collaborated with the Neighborhoods Department to request that the service providers responsible for administering the STRMU HOPWA program submit comprehensive records and documentation. This request included a detailed list of all recipients who received assistance from the STRMU HOPWA program during the 2023-2024 cycle, along with the respective dates the financial assistance was provided, the amounts disbursed, and the number of weeks of assistance corresponding to each amount.

The OIG's review revealed recipients who had received STRMU HOPWA assistance from multiple service providers. Although it is permissible for recipients to receive assistance from more than one service provider, it is essential to note that, according to STRMU HOPWA guidelines, they cannot exceed the program's maximum assistance duration of 21 weeks without documentation of a waiver.

A review of the data provided to the OIG revealed that 65 recipients exceeded the program's maximum assistance duration of 21 weeks without documentation of a waiver. Upon further review of the 65 recipients, 55 had submitted erroneous information concerning their previous receipt of STRMU HOPWA assistance within the last 12 months. This issue was especially evident in cases where recipients responded with "No" or, in instances where they acknowledged receiving assistance with a "Yes," they failed to provide the full context or neglected to clarify whether they had indeed received any assistance.

Recipients seeking assistance from an alternative service provider were required to complete that provider's specific application and submit all necessary documentation. Although uniformity is not required, the applications utilized by the service providers were not standardized; each provider had its own application. This became particularly clear in the disclosures on Intake Assessment forms about whether recipients had previously received assistance from the HOPWA program. Certain service providers require recipients to complete a Certificate of Prior Housing form, designed to verify whether they had received HOPWA assistance within the previous 12 months. In completing this form, recipients were committed to ensuring that the information they provided was both accurate and truthful. They were made aware that any failure to disclose prior receipt of HOPWA assistance would result in denial of assistance. Conversely, other service providers required only a yes or no response—either verbally or in writing—to ascertain if the applicant had received HOPWA assistance within the past 12 months. It is important to note that the use of differing applications does not constitute a violation.

Out of the 65 recipients, 15 exceeded the maximum assistance duration of 21 weeks as stipulated by the program. These recipients indicated in their applications that they had previously received support from the HOPWA program.

OIG's Data Analytics Unit review revealed that \$326,335.77 in assistance was disbursed to 55 recipients who had exceeded the program's maximum assistance duration of 21 weeks without

the requisite documentation of a waiver. If unit assistance had been capped for 21 weeks, they would have been eligible for only \$218,493.88 based on their average weekly disbursement. Therefore, this resulted in approximately \$116,169.89 in excess payments.²

The OIG contacted the Neighborhoods Department and relevant service providers and subsequently inquired regarding the following response.

- Did the misleading information the 55 recipients provided lead to a depletion of the service providers' HOPWA funds?
- Did the misinformation that they provided hinder other recipients from obtaining the essential assistance they needed?
- Did the actions in question inadvertently result in a reduction of available resources, such that a truthful declaration could have allowed for greater allocation of funds to other recipients in need?

The service providers responded and indicated that the HOPWA funds allocated to the recipients who provided misleading information did not result in the depletion of HOPWA funds. Furthermore, it did not prevent others from accessing the assistance they required.

Based on the response from the COJ Neighborhoods Department, they indicated that, while the actions in question may have inadvertently resulted in a reduction of available resources, a truthful declaration could have facilitated a greater allocation of funds to those in need.

The OIG concluded that the additional assistance leading to the excess disbursement of the approximate \$116,169.89 could have been avoided if HMIS had been implemented prior to the 2023-2024 HOPWA Cycle.

The OIG would like to commend the Neighborhoods Department for bringing to our attention the deficiencies identified in the STRMU HOPWA program 2023-2024 cycle. Additionally, the OIG expresses gratitude to the Neighborhoods Department, Catholic Charities, Lutheran Social Services, Northeast Florida AIDS Network, and JASMYN for their cooperation and assistance during this review.

Recommended Corrective Actions

To enhance the STRMU HOPWA program's defenses against fraud, it is crucial for service providers administering and implementing the STRMU HOPWA program to establish effective strategies for preventing, detecting, and responding to fraudulent activities. The OIG suggests that the COJ Neighborhoods Department communicate with the service providers to carry out the following recommendations.

² HOPWA Analysis of Duval County Administered HUD Funding #2025-0000092

1. The OIG recommends that service providers establish clear anti-fraud policies. These policies should define what constitutes fraud, outline procedures for preventing and responding to fraudulent activities, and specify the consequences for engaging in such behavior. Additionally, it is essential to create defined reporting channels for employees to report suspected fraud. This may include options like a hotline, an email address, or a designated reporting officer.
2. Ensure the fraud policy is readily available and easily understood by all relevant parties, including staff and clients.
3. Promote a confidential and accessible reporting mechanism by establishing a clear, accessible, and confidential system for reporting fraud.
4. The OIG recommends that the Neighborhoods Department require a uniform application process for sub-recipients to deter fraud and ensure accountability.
5. The OIG recommends that service providers upload fraudulent documentation submitted by a denied client during the application for assistance into HMIS. Furthermore, it is advised that service providers integrate detailed explanations into HMIS concerning instances of duplicate payments, suspected fraud, and denial of assistance.
6. The OIG recommends that service providers affirmatively verify clients' employment and income information.
7. According to HOPWA guidelines, service providers are required to complete a visual assessment training course and conduct housing quality standard inspections for recipients of STRMU assistance who meet the following criteria: the assistance lasts more than 100 consecutive days, the house was built before 1978, and the household includes pregnant individuals or children under the age of six. The OIG recommends that service providers implement these practices if they are not already doing so.
8. Regarding recipients who provide false information about their previous receipt of STRMU HOPWA assistance, the OIG recommends that the appropriate action be taken in accordance with HOPWA regulations as listed:

3.7 Fraudulent Information

Providing false information to the government when applying for "federal public benefit programs" is unlawful; for more information, see Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801-3812. Grantees are encouraged to contact their legal counsel and local HUD Field Office for guidance in addressing potential fraud by a HOPWA-assisted household. In some cases, termination may be necessary. The HOPWA regulations provide guidance on terminating assistance at 24 CFR 574.310 (e)(2).

Management's Response

Thank you for your review of the City of Jacksonville's HOPWA Short-Term Rent, Mortgage, and Utility (STRMU) program and for the recommendations provided to strengthen the program against fraud and improve accountability.

In December 2024, the Housing and Community Development Department (HCDD) identified deficiencies in the STRMU process that created opportunities for recipients to exceed the 21-week limit without proper documentation. Recognizing these concerns, HCDD immediately began implementing major corrective measures to combat fraud and strengthen program integrity.

A central component of these corrective actions was the implementation of the Homeless Management Information System (HMIS) in March 2025. All service providers are now required to use HMIS to track every applicant who seeks STRMU assistance, whether approved or denied. This change ensures that comprehensive, centralized records are maintained and eliminates the gaps in oversight that previously allowed duplication of benefits. The system also allows us to identify fraudulent applications and prevent applicants from exceeding allowable time limits across multiple providers.

In addition to implementing HMIS, HCDD has taken steps to enhance training, strengthen monitoring, and reinforce clear accountability measures with service providers. These changes have substantially improved the integrity of the program and provide stronger safeguards to ensure funds are directed appropriately to those most in need.

We are committed to working closely with OIG, HUD, and our partner service providers to further strengthen fraud prevention efforts and implement your recommendations, including developing clear anti-fraud policies, requiring uniform application processes, and ensuring proper documentation is uploaded into HMIS.

We appreciate your partnership and oversight as we continue to improve program operations to safeguard resources, protect program integrity, and best serve the community.

Inspector General Standards

This report/review has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles and Quality Standards for Investigations.

"Enhancing Public Trust in Government Through Independent and Responsible Oversight"
