Data Analytics Unit

HOPWA: ANALYSIS OF DUVAL COUNTY ADMINISTERED HUD FUNDING 2025

2025-0000092

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Executive Summary

The Housing Opportunities for Persons with AIDS (HOPWA) program is the only federal program dedicated to meeting the housing needs of low-income people living with HIV/AIDS and their families. Under this program, the U.S. Department of Housing and Urban Development (HUD) makes grants to local communities, states, and nonprofit organizations. The AIDS Housing Opportunity Act limits short-term rent, mortgage, and utility assistance to 21 weeks in any 52-week period. The Investigations Unit asked the Data Analytics Unit to examine recipient-level data to identify Duval County clients who received assistance beyond the 21-week limit but certified that they had not received assistance in the last 52 weeks.

Data analysis revealed that 41% of local HOPWA recipients exceeded the statutory 21-week assistance cap, in some cases by several months. These extended benefit periods resulted in substantial additional disbursements beyond what program rules allow. The frequency and scale of these overages point to recurring compliance issues, suggesting that existing verification and monitoring measures may not be sufficient to prevent or detect violations in a timely manner.

Objective Statement

This data inquiry was initiated by the Investigations Unit of the Office of Inspector General (OIG) after concerns arose that clients participating in the HOPWA program may have received assistance beyond the statutory 21-week limit while declaring they had not received assistance in the last 52 weeks. The primary objective of this analysis is to identify such cases, quantify the financial impact of overpayments, and assess whether existing controls adequately detect and prevent fraudulent or misleading client certifications.

The City of Jacksonville's Office of Inspector General (OIG) is empowered to audit, evaluate, and investigate municipal programs, including those funded with federal dollars, to ensure efficiency, effectiveness, and integrity. As part of this mandate, the OIG examines local administration of HUD-funded programs to detect and deter fraud, waste, and abuse, and to gauge the adequacy of internal controls. Because the HOPWA program is delivered through Jacksonville's Neighborhoods Department, the OIG has the authority to review how local grantees and project sponsors manage these funds, even though the funding originates from the federal level.

Summary of Findings on Data Analysis

- **Number of flagged recipients**: 55 individuals out of 133 unique recipients were identified as having received assistance beyond the 21-week limit.
- **Extent of overpayment**: The total excess payments amounted to $116,169.89. The average overpayment was $2,112.18 per client, with a median of $1,982.54.

- **Frequency of violation:** Clients received a mean of 32.5 weeks of assistance, which equates to about 11.2 weeks over the 21-week limit. Weeks of assistance ranged from 23.5 to 46.0.
- **Distribution of time over the limit:**
  - 1-3 weeks over limit: 12 recipients
  - 4-7 weeks over limit: 10 recipients
  - 8-11 weeks over limit: 7 recipients
  - 12-15 weeks over limit: 13 recipients
  - 16+ weeks over limit: 13 recipients
- **Notable cases:** The following table lists the ten clients with the largest overpaid amounts.

Recipient	Weeks of Assistance	Weeks Over Limit	Total Amount Received	Excess Over Allowed Amount
Recipient 1	36	15	$14,554.06	$6,064.19
Recipient 2	36	15	$14,232.43	$5,930.18
Recipient 3	45	24	$9,542.00	$5,089.07
Recipient 4	44	23	$9,616.02	$5,026.56
Recipient 5	45	24	$8,360.16	$4,458.75
Recipient 6	36	15	$10,256.34	$4,273.48
Recipient 7	44	23	$7,647.85	$3,997.74
Recipient 8	40	19	$7,796.87	$3,703.51
Recipient 9	34	13	$9,100.00	$3,479.41
Recipient 10	37	16	$6,469.36	$2,797.56

Scope of Analysis

The analysis draws exclusively on the **'Recipients Over 21 Weeks'** worksheet created by the OIG's Data Analytics Unit at the request of the Investigations Unit. Each record in that worksheet contains the client's name, the total weeks of assistance received, the total dollar amount of assistance, and the average weekly disbursement. The data cover assistance transactions recorded between April 2023 and September 2024 (as inferred from the broader dataset). However, this analysis focuses only on aggregated totals for the 55 clients (out of 133 total recipients) who exceeded the 21-week limit. It does not evaluate the accuracy of underlying payment data or consider other HOPWA services.

Overpayments were estimated by dividing each client's total assistance by their total weeks of support, determining an average weekly disbursement, then multiplying that figure by the 21-week cap to estimate the maximum permissible amount. The difference between this estimated cap and the actual total received was treated as an excess payment for analysis purposes. Because the dataset contained only the total weeks of assistance and the total amount received, not transaction-level payment dates or amounts, these figures represent calculated estimates rather than confirmed overpayment amounts. Weeks over limit were derived by subtracting 21 from the reported weeks of assistance, with no negative values present in this dataset.

Background

The AIDS Housing Opportunity Act authorized the HOPWA program, which is a federal program devoted to meeting the housing needs of people living with HIV/AIDS[1]. Under the program, HUD provides formula and competitive grants to states, localities, and nonprofits to ensure that eligible households obtain and maintain affordable, safe, and stable housing.[2] Assistance may include tenant-based rental assistance, facility-based housing, permanent housing placement, supportive services, and short-term rent, mortgage, and utility (STRMU) payments. [3]

The short-term rent, mortgage, and utility component is intended to address temporary housing crises[4]; the AIDS Housing Opportunity Act stipulates that STRMU assistance may not exceed 21 weeks during any 52-week period.[5]These limits are meant to ensure that

[1] *AIDS Housing Opportunity Act*, Pub. L. No. 100-485, § 858, 42 U.S.C. § 12907 (1988)
[2] 24 C.F.R § 574 (2025)
[3] *Id*.
[4] 24 C.F.R. § 574.300 (2025)
[5] 24 C.F.R. § 574.330(a)(1) (2025)

resources are used as a stop-gap measure while households transition to long-term housing solutions.

Per Investigator interviews and research, funding for HOPWA flows from the U.S. Department of Housing and Urban Development (HUD) to the City of Jacksonville's Neighborhoods Department. The City then allocates these funds to multiple nonprofit project sponsors, such as Catholic Charities, Northeast Florida AIDS Network (NFAN), and Lutheran Social Services, that deliver housing assistance directly to clients. Each sponsor conducts its own intake, eligibility review, and payment processing, and while they are subject to HUD and City rules, they operate independently of one another in their day-to-day administration of HOPWA assistance.

Data Collection and Methodology

Data Sources

The OIG's Data Analytics Unit compiled the aggregated worksheet titled **'Recipients Over 21 Weeks',** summarizing total assistance received by clients who exceeded 21 weeks. This worksheet, prepared in response to the Investigations Unit's request, contained each client's name, total weeks of assistance, total dollar amount received, and the calculated average weekly disbursement. No personally identifiable information beyond names was analyzed. The master dataset used for this analysis was compiled by the lead investigator from spreadsheets provided by each HOPWA project sponsor. Each sponsor's file contained recipient-level details, including weeks of assistance, total assistance amounts, and related eligibility information. The investigator aggregated these files into a single master spreadsheet that calculated combined totals for weeks of assistance and amounts received for each client across all sponsors.

Data Preparation

Records with missing names were excluded to ensure accurate per-recipient analysis. For each client, weeks over the limit were calculated by subtracting 21 from the total weeks. The allowed 21-week disbursement was computed by multiplying the average weekly disbursement by 21. Overpaid amounts were then derived by subtracting this allowed amount from the total assistance received.

Analytical Techniques

Descriptive statistics (counts, sums, averages, medians, and ranges) were used to summarize the extent of over-assistance and characterize the distribution of weeks over the limit. Recipients were grouped into categories based on how many weeks they exceeded the limit, and a top-ten ranking identified cases with the largest excess payments. All calculations were performed using Python's Pandas library.

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Software and Tools Utilized

- **IDEA 12.2**: For data triage, normalization, and cleansing of the source spreadsheets.
- **Excel**: For preliminary data validation and initial exploratory analysis.
- **Python 3.13**: For final data calculations and field visualization.

Findings

1. Number of recipients exceeding the statutory 21-week limit

A total of **55 clients** received assistance beyond the 21-week limit. Clients averaged 32.5 weeks of assistance, with a range from 23.5 to 46.0 weeks. This means that a typical client received about **11.4 extra weeks** of support. The distribution indicates varied amounts of excessive payments: 12 clients exceeded the limit by only 1 to 3 weeks, while 13 clients received at least 16 extra weeks of assistance. Such a pattern suggests that both minor and major overruns occur and that monitoring mechanisms may not be flagging problems consistently.

2. Significant financial impact of excess assistance

The flagged clients collectively received $326,335.77 in assistance. When the 21-week limit is applied, the amount that should have been disbursed to these clients is $218,493.88. Therefore, $116,169.89 represents payments beyond what the program allows. The average excess per client was $2,112.18, and some overpayments exceeded $6,064.19. The recurring nature of these overpayments demonstrates a risk of waste and potential fraud.

3. Noncompliance concentrated among a subset of clients

While overages of 1–3 weeks were common, these smaller week overruns still represented roughly a quarter of the total overpayment dollars, which is about the same proportion as the 13 clients with 16 or more extra weeks of assistance. This shows that even small week overruns can add up to substantial costs, while larger overruns concentrated in fewer clients also drive a comparable share of excess payments. The largest overpayment (more than $6,064.19) occurred for a client who had 42 weeks of assistance (21 extra weeks).

4. False certifications enabled over assistance

The provided HOPWA information indicated that all clients listed in the dataset declared that they had not received assistance in the last 52 weeks. However, aggregated payment data from all HOPWA program sponsors show that these clients did in fact receive prior assistance; the higher total weeks and average weekly disbursements make this evident. According to the lead investigator, sponsor intake forms asked whether recipients had received HOPWA from other sponsors, but did not make the 52-week limit explicit. Regardless of any misunderstanding, these certifications were false under program rules, and the higher total weeks and average weekly disbursements from aggregated data confirm prior assistance. This indicates that the certification process relies heavily on self-reporting without sufficient verification against a central database or cross-program records.

5. Potential programmatic and control weaknesses

HOPWA assistance in Duval County is administered through multiple project sponsors, each responsible for intake, eligibility verification, and payment processing. The fact that clients were able to receive assistance beyond statutory limits indicates weaknesses in monitoring and coordination across these sponsors. In this case, more than 40% of all known recipients in the dataset exceeded the 21-week limit, suggesting that current systems for tracking weeks of assistance and verifying prior aid are insufficient.

Conclusion

The analysis of the '**Recipients Over 21 Weeks'** dataset reveals that approximately 41% of clients received payments exceeding the HOPWA program's 21-week limit for short-term rent, mortgage, and utility assistance. 55 clients were identified as having received assistance beyond the statutory cap despite certifying that they had never previously received assistance, resulting in more than **$116,169.89** in excess payments. The pattern of violations, which ranges from minor overruns to cases where clients more than doubled the permissible weeks, underscores significant weaknesses in verification, monitoring, and record-keeping. This may result in Jacksonville citizens, who are in need of assistance, not receiving help due to a depletion of available funds by ineligible recipients.