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Director and State Public Health Officer

State of California—Health and Human Services Agency
California Department of Public Health



GAVIN NEWSOM
Governor

MEMORANDUM

Office of AIDS
Housing Opportunities for Persons With AIDS Program

Management Memorandum
Letter Number: 22-01

December 26, 2022

TO: Housing Opportunities for Persons with AIDS (HOPWA) Project
Sponsors

SUBJECT: Compliance with U.S. Housing and Urban Development (HUD) Notice
CDP-22-15 Carbon Monoxide Alarms or Detectors in HOPWA-Assisted
Housing

Purpose

This Management Memorandum provides guidance on compliance with the U.S. Department of Housing and Urban Development (HUD) requirement for maintaining carbon monoxide (CO) alarms or detectors in HOPWA-assisted housing.

Background

Section 101 of Title I of Division Q of the Consolidated Appropriations Act, 2021, Pub. L. 116–260, div. Q, title I, §101 (2020 amended HOPWA program legislation to require CO alarms or detectors. On December 8, 2022, HUD released notice [CDP-22-15](#), mandating CO alarms or detectors in all housing funded by the HOPWA program. Notice CDP-22-15 requires that effective December 27, 2022, HOPWA project sponsors ensure CO alarms or detectors are installed in all HOPWA-assisted units and meet or exceed the standards described in chapters



9 and 11 of the 2018 publication of the International Fire Code, as published by the International Code Council.

Policy

Project sponsors must consider the following steps for implementing the new requirement:

- 1) Develop policies and procedures to ensure all existing and future HOPWA-assisted housing have CO alarms or detectors installed.
- 2) For housing activities subject to the HOPWA Housing Quality Standards (acquisition, rehabilitation, conversion, lease, and repair of facilities, new construction, project or tenant-based rental assistance, and operating costs), project sponsors should assess for CO alarms or detectors when completing Housing Quality Standards inspections. Update inspection forms to include this requirement and keep documentation of compliance in assisted households' files.
- 3) For housing activities not subject to HOPWA Housing Quality Standards (short-term rent, mortgage, and utility payments, permanent housing placement), project sponsors may rely on the self-certification of the tenant or owner that the dwelling meets the carbon monoxide alarm or detector requirement. The self-certification should be kept in assisted households' files.
- 4) Project sponsors may bill staff time spent conducting landlord outreach and education on this new requirement, conducting inspections and updating inspection forms, and assisting households with self-certifications. Project sponsors may bill Housing Information Services (HIS) for staff time spent conducting outreach and education on carbon monoxide alarms and detectors to HOPWA-assisted households.
- 5) Project sponsors will be monitored for compliance with this new requirement during HOPWA site visits, via questions on the monitoring tool and the client chart review tool.

Action Required

Project sponsors must be in compliance with these requirements starting December 27, 2022. Project sponsors must forward this information to any subcontractors that own or operate housing facilities funded under HOPWA.

Contact Information

For any questions regarding this management memorandum, please [contact the CDPH HOPWA Program](mailto:HOPWARFA@cdph.ca.gov) HOPWARFA@cdph.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Kent". The signature is stylized with a large initial "C" and a horizontal line extending to the right.

Chris Kent, MA
Chief, Care Housing Unit
Office of AIDS

U.S. Department of Housing and Urban Development (HUD) Carbon Monoxide Alarms or Detectors in Housing Opportunities for Persons With AIDS (HOPWA)- Assisted Housing ([NOTICE CPD-22-15](#))
<https://www.hud.gov/sites/dfiles/OCHCO/documents/2022-15cpdn.pdf>

cc: Abigail West, Care Housing Unit