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Office of AIDS
HIV Care Program

Management Memorandum No. 24-03
Supersedes HCP MM No. 18-01

DATE: October 15, 2024

TO: HIV Care Program Subrecipients

SUBJECT: Rental Security Deposits

I. Purpose

The purpose of this Management Memorandum is to update HIV Care Program (HCP) subrecipients and their providers on rental security deposit allowability for clients. The Health Resources and Services Administration (HRSA) released a [program letter](#) on June 26, 2024 that improves access to housing for people living with HIV (PLWH), by allowing Ryan White HIV/AIDS Program (RWHAP) funds to cover security deposits for eligible clients under the Housing Services category.

II. Background

The absence of stable housing has a detrimental effect on the health outcomes of PLWH. HCP clients with stable housing experience a greater rate of viral suppression compared to those with unstable housing. The prior HRSA guidelines that prohibited security deposits were a barrier to helping clients achieve housing stability. To alleviate this barrier, this Management Memo updates guidelines to allow security deposits with RWHAP funds for eligible HCP clients, effective immediately.

III. Policy

HCP providers interested in providing security deposits under Housing Services must ensure the following: (a) security deposits are available and accessible in a clear and transparent manner to all eligible HCP clients who seek them (b) security deposit checks are issued directly to the landlord and without any reference to HIV/AIDS, (c) all returned security deposits are given back to the HCP provider upon termination of the rental contract, not to the HCP client, and (d) payor of last resort requirement is met.

Emergency Financial Assistance should not be used for security deposit payments for HCP.



IV. Implementation

HCP providers who would like to fund rental deposit must take the following steps:

1. Ensure that Housing Services is funded on your budget. Submit budget revision if necessary.
2. Provide landlords and clients a written document outlining the security deposit policy upon entering the rental agreement, including the HCP client name, rental property address, amount of the security deposit, and a clearly written statement that the security deposit must be returned directly to the HCP provider.
3. Enter security deposits on the Services screen in HIV Care Connect (HCC).
4. Establish a tracking system for security deposits that includes client name, property address, lease agreement dates, security deposit amount, and as applicable the deposit amount returned, and when/how program income was used.
5. Spend security deposits returned as program income first before other HCP funds on any allowable HCP service category, Clinical Quality Management (CQM), or administrative costs.

Security deposits will be monitored under the Housing Service category. Monitored items will include: (a) policies, procedures, and agency document sent to landlords/clients, (b) fiscal tracking system for security deposits, and (c) how the program income is utilized once remaining security deposits are returned.

Thank you for your collaboration to improve health outcomes for PLWH. If you have questions about this memorandum, please contact your assigned program advisor.

Sincerely,

A handwritten signature in cursive script that reads "Sean Abucay". The signature is written in black ink on a light-colored background.

Sean Abucay, Chief
Care Program Section
HIV Care Branch