COLLABORATIVE SOLUTIONS, INC.

Moderator: Valencia Moss
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OPERATOR: This is Conference # STRMU Office Hours 10.22.2020

SLIDE 1

Valencia Moss: Hello, everyone, and welcome to HOPWA/COVID-19 STRMU Office Hours. Today is October 22nd, 2020.

Today's webinar is begin recorded and will be made for on-demand viewing through the HUD Exchange website. We will also email a copy of today's PowerPoint presentation being used after the webinar concludes.

I would like to introduce to you your first speaker, Kate Briddell.

Kate Briddell: Thank you, Valencia. Hi, everyone. Welcome again to today's webinar. Today's speakers are going to be me, Kate Briddell, and Crystal Pope from Collaborative Solutions. Monitoring the Q&A box are Emily Fischbein and Christine Campbell also from Collaborative Solutions. And also on the line today are staff from the Office of HIV-AIDS Housing, Rita Harcrow, the Director, and Amy Palilonis, the Senior Program Specialist. Rita, would you like to say a few words?

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Rita Harcrow: Hey, Kate. Yes, I would like to say hi to everyone. Thank you all so much for joining today for another session about STRMU. When the pandemic first started, our goal was to try to make STRMU as flexible as we possibly could.

We were looking at how to waive as much as possible and, again, get that flexibility in place. But along with that comes a lot of questions about how to apply the different flexibilities. It's super confusing to understand tracking and the different waivers and pots of money that are in play for STRMU.

And so, we want to be able to talk through some of that today, answer more questions today about how to be flexible but still understand that there are some rules that apply, so hopefully we can talk through that and get everybody more comfortable with how to use STRMU right now during the pandemic when it's so needed. And again, just welcome, everyone. Thanks.

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Kate Briddell: Great. Thank you, Rita. So today's format is going to be a little bit different than we've typically done. We have many few – many fewer slides, and we're going to get to your questions. So here is some instructions on how to submit your questions. Please be sure to use the Q&A feature and not the chat box. Before we get started with you all inputting your questions, we have some questions of our own. Valencia, can you put up that first poll question for us, please?

So we would like to know from you all if what other office hours you would like to see in the future. Information about U.S. – sorry, using hotel-motels in your community response, remote inspections, supportive services, remote methods or practices, things about the FMR standard waiver, self-certification and income and HIV waiver and policies and procedures. So if you can put your votes in now, that would be terrific. We're going to give people a little bit of time to get their answers in. We probably have a tenth of the people now. And we'll use this information to inform our next office hours.

Valencia Moss: There's a second question to that poll, too.

Kate Briddell: There is a second question to that poll. I'm sorry. I thought that was going to come as a second question. The second question is how long have you been operating a STRMU program? It is multiple choice. The responses are brand new to STRMU. We've been doing this only since COVID; less than a year; between one and five years; and more than five years. And then we have a third question to lighten things up a little bit. Have you made sourdough bread since the start of COVID restrictions? This is also multiple choice. Yes, no, and nope, I'm busier now than before COVID. I should have asked a follow up question to the yes question to find out whether or not it was the first time you've made sourdough bread, but I didn't.

Crystal Pope: Could we queue laughter?

Kate Briddell: It will remain a mystery. Yes, please! I'm (inaudible) up here. (Inaudible).

Crystal Pope: Right.

Kate Briddell: All right, and just over half of you have voted. If you could keep voting, it really does help us understand who our audience is and what you guys need in the future for some assistance. We're at two-thirds of people have voted. Let's get out the vote. We're all in practice. I don't know about you. Being out here in Washington State, we got our ballots a few days ago and mine is already in, so let's keep up that practice of voting and doing our civic duties. Right now we're at 67 percent. Love to see some more voter turnout.

All right, we'll give it about 30 more seconds and then we will close the poll and get onto the meat of our presentation. Great, so here are the poll results. We have an overwhelming request for Policies and Procedures at 58 percent. Then the next strong – highest candidate is Supportive Services. And then we kind of have a tie for almost everything else.

For those of you doing a STRMU program, the majority. Well, I guess it's not a majority. The bulk of you have been doing it for more than five years, but there's a fair number who are brand new to STRMU. And then most of you did not bake sourdough bread. So I don't know if you can see these. Thank you for participating. As I said, this will really help us with our future work. All right, so once again put the questions in the Q&A, please, and we'll get to that. Crystal, please take us through a review.

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Crystal Pope: Yay. So this is going to be different than any of our previous webinars, and we wanted to be more informal and we'll find out how well that works for everyone, but we want to set the stage and do a quick review of some of the basics about STRMU funding options that have been made available through the CARES Act funding and the two HOPWA waivers.

This information, and a lot more, was presented during some of the past STRMU webinars, and you can encourage people who want more information on that to pull those up on the HUD Exchange and take a look at them.

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Thank you. So looking at it this way, these are our three different STRMU program categories. The first is your existing STRMU program, right, if you have one funded through regular HOPWA allocations. And in this program a client can receive up to 21 weeks of assistance in a 52-week period, or you can have caps in place that allow fewer weeks or a cap on the total amount that could be received. All of the normal STRMU rules apply there.

The second is the same – that same existing STRMU program in which you're using the 5-22-20 waiver option that can be applied on an individual household basis to allow people to get up to 12 months of assistance in that 12-month period. And the third is STRMU that's provided using CARES Act funds or FY20 funds that have been specifically set aside in your Action Plan for COVID-19, and we'll make sure and touch on that a little bit later, and that allows STRMU to be provided for up to a total of 24 months.

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So every jurisdiction is going to be somewhat different. There's – I know a lot of people have asked us what's – how can we decided which stream of STRMU to use. So there's really no one recommended way to do that. Each grantee should really look at their HOPWA and non-HOPWA resources as well as any of your information on projected community need or you should be kind of tracking that to help develop a process for making those decisions throughout the life of the program.

And also, agency leadership and our financial folks really need to develop something within the program to work on tracking those balances because that will make a difference, too, to be able to communicate to STRMU staff throughout, and that will help facilitate decisions on which of the funding streams you would use in any given situation.

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And then just a couple of notes on program design, we recommend that you – we talked about this before – that you look at STRMU provided through the – throughout this COVID-19 pandemic as one program regardless of the funding source or sources that you're using.

When we say that, that one program - that's what would be presented outward to your clients, your potential clients, the public, and the community, saying that you'll provide STRMU to help people who are impacted by the pandemic to reduce the risk of homelessness and that there is supplemental funding that will allow some expansion and changes to the program that will help meet those needs, but not talking about them each separately.

We strongly recommend that one program view, which would include having one set of goals, one intake and assessment form (or set of forms) that includes your regular HOPWA plus some of the CARES Act questions – related questions that you would have. And with that in mind, programs can set goals, retool their eligibility and assessment process, and develop some brief additions to policies and procedures.

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So the fact that you have additional funding sources and you're trying to meet greatly increased needs in your area and you're dealing with remote work and your own life, I mean, everybody has been impacted with this, and if there's no time to bake bread, then there's no time for other things, too. So anyway, it makes more sense to keep your processes as simple as possible.

So here are a few of the recommendations that we have made in the past - is to make sure that the program setup always used these terms: to prevent, prepare for, and respond to COVID-19. Those are the – that's the language that's in the CARES Act. If you have questions about how you're using COVID – or

CARES Act funds, make sure you just reflect back on this - that you're meeting one of these things.

You want to make intake and access and assessments as speedy and responsive as possible. This is something that needs to be done quickly. Keep your – again, keep your policies and procedures that you need for this as simple as possible. And remember that you can make – you can and should make decisions about the amount of assistance given to the household incrementally, not all upfront. You don't have to decide how long someone's going to be getting this, but for assessing them right now and what that will look like going forward.

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So just a couple of things on targeting, obviously whenever you have limited funding to use, programs generally need to have some ideas about how to target assistance, where it's needed most, and as noted in this slide the strategies you use for targeting should be based on the amount of HOPWA funding available. Also, you take into consideration, right, the other resources that are available in your community and an assessment of expected need locally.

So some of your decision points might be – could be - targeting lower – targeting lower-income households and doing 50 percent and below, or you can do 80. It's just that's an option you have, but we really want to point out that you should consider removing those – some of those existing STRMU assistance caps. It's – a lot of those caps were developed for a different world, and we're in a different time now and it really doesn't make as much sense with COVID-19 and with the different streams of funding.

That may be something you would go back to in the future but probably doesn't make as much sense now. You can certainly add caps if it's needed based on your local planning and funding. For instance, you could make a decision to – with CARES Act funding to provide up to a maximum of 18 months or 12 months or it just depends upon how many people you're expecting to serve and what the need will be, so that's a possibility.

And we always want to say consider giving some priority to home-owners because renters do have some other emergency rent assistance programs that will apply to them, but very few have assistance with mortgages.

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And I think, Kate, that's what I wanted to cover, and back to you.

Kate Briddell: Great. Thanks, Crystal. So we just had some practice suggestions for your STRMU program. We've shared this information with you before, but we wanted to review it again. Just some practice suggestions for assessments.

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Consider adapting your existing assessment forms to include questions relevant to COVID-19. Again, as Crystal said you don't have to create a whole new body of forms for these. You can just amend them to include those questions.

Be as flexible as possible when assessing household needs based on all of the local COVID-19 impact, and include direct and indirect ways the household is impacted by COVID-19 in your assessment notes.

Because client stability may be a longer-term issue during the pandemic and it also might be possibly changing or erratic, if you will, because of the way that these restrictions have been imposed and then relaxed and then imposed again, remember that you're assessing them for a point in time and that further assessment – reassessment may be needed in the future.

And then remember that no immediate decision needs to be made on the total weeks or months of STRMU that you'll be giving. As Crystal said right up front, you don't need to make that decision then. Start by providing what's needed for a reasonable time period based on your assessment of the situation, the budget you have, and your internal policies.

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Some practice suggestions for your ongoing assessment process – establish a process for reassessing or check-ins with those clients at regular intervals. As

I mentioned, the COVID-19 related impact on a family may be volatile and can change quickly. So rather than closing out cases after you've given assistance to a family or a household, consider keeping it open rather than treating it like a one-time help, in case that client needs to come back in, you don't have to go through all of that onboarding or initial paperwork.

And then regular assessments or check-ins can really help you catch problems early, so whether it's rent related or related to other critical needs like food shortages. And then ongoing assessments can also help you address whether STRMU remains the best available solution or if other longer-term rental assistance options might be appropriate when they become and whether or not they're available.

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We do have a one new bit of information to share with you. Well not incredibly new, but there was an executive order issued on August 8. This – I'm sorry. It's a presidential memorandum, not an executive order. The memorandum authorizes $400 a week in additional federal unemployment benefits paid to claimants through the Lost Wages Assistance Programs. The $400 weekly payment is funded by two sources. The federal government contributes 75 percent of it, totaling $300, and the state can contribute the remaining 25 percent. Some states have opted to pay only the federal portion of $300 per week while other states have opted to pay the state portion, increasing that to $400 a week.

The HOPWA program will exclude the $400 or $300 per week of the federal unemployment benefit from the income and rent calculation for participants. This is similar to what had been done for the previous CARES Act payments. So this specific unemployment benefit is excluded based on the presidential memo authorizing the federal contribution through FEMA to provide assistance under the Stafford Act, which is normally excludable income. I know that got a little gobbledygooky at the end, but just remember the $400 or the $300 of the federal income unemployment is not included as income.

Hopefully that made sense. Amy or Rita, did you have anything you wanted to add to that?

Rita Harcrow: I don't – I don't think I have anything to add to that. I know that we have some questions coming in about the different kinds of unemployment insurance, so I don't know if this addressed the question, but feel free to clarify your question if you have something more about this. This was a decision that was just made recently within the last few days for CPD about excluding this particular income.

Crystal Pope: Rita, I know there's another question in right now about whether you would count something called pandemic unemployment assistance?

Rita Harcrow: Right, and so I was actually on the side here trying to pull up the memo about that. So there is guidance about that that's been issued for CPD, and that particular memo involved the multiple kinds of pandemic unemployment insurance, the PUA. There was a short-term bump that's no longer in place. I think that's been replaced by this particular presidential memorandum for an additional bump. So let me – give me a minute to pull that memo and hopefully we can get that out to everybody so you'll have the different kinds of pandemic unemployment listed. I just – PUA, I think there are three or four listed in that memo, so I don't want to say the wrong thing, but I will work on that one.

Kate Briddell: I appreciate that, Rita. Thank you. Well that's it for our slides. Now we are on to your questions. Christine or Emily? You're muted, Christine. There you go.

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Christine Campbell: (I know, I just unmuted me). So one of our questions we have, it's generally for HOPWA in general, but I think it's important we highlight it. If a person in the HOPWA program is non-compliant with medical care and is a practicing substance abuser, can we remove him from the voucher program? Even with COVID restrictions and recommendations he could remain in the apartment if he paid his total monthly rental.

Crystal Pope: So I can address that, and anybody else can jump in, too. There's – there is no HOPWA requirement either from the regulations or the guidance that states that people have to be compliant with medical care or with any appointments or referrals that you make, or be not using substances in order to receive HOPWA housing whether it's STRMU or TBRA.

I understand that some local programs may have some restrictions like that, but I would just as a reminder HOPWA looks at termination as a last resort and only for very egregious kind of circumstances. And so, I would say we really strongly encourage the use of housing first and harm reduction methods and working with people who are having these kinds of issues while they're in housing, but not terminating housing because of those things.

Amy Palilonis: And this is Amy. I really recommend viewing our termination presentation from the HOPWA Institute, which really talked about making sure you have strong policies and procedures around termination. And I'll put a link to that presentation in the – in the Q&A as a response so you have that.

Emily Fischbein: OK. Ready for the next question? We have a question: can we pay rental arrears more than once for a client?

Kate Briddell: Yes.

Crystal Pope: Yes, we were just trying to figure out what that meant, exactly. Certainly, this – the different kinds of STRMU through – gives you more leeway to be able to do that over a longer period of time, but yes, you can certainly have circumstances where you are doing arrears and then somebody gets behind again.

Unless you are continuing to work, you're going to be – best case scenario is you're continuing to kind of stay with that client or check in with them and have regular kind of check ins, like Kate was talking about, so that you would catch those things early so they wouldn't, again, be in an arrears situation. But, the basis answer is yes.

Christine Campbell: Thanks Crystal. Is there a financial analysis tool available to grantees so they can determine if the assistance stabilized the recipient?

Crystal Pope: I think this one had to do with the foreclosure, right?

Christine Campbell: Exactly, so that could determine if a household would be foreclosed regardless if they got the assistance.

Crystal Pope: Yes, I – well I would say there's not an actual tool to do that. I mean, we usually advise that if you are looking at paying someone's mortgage, you have to be cognizant of whether it's – they're already so much in arrears that they will lose that house before you make a decision about it. But there's no real set guideline that I'm aware of.

Emily Fischbein: Thanks Crystal. OK, here's a question, if you have HOPWA formula CV funds and HOPWA competitive CV funds, would you recommend spending down one or the other as a priority, putting aside balances and grant end dates and spend downs? I guess the last part probably means if all is considered equal, would you advise spending formula funds or competitive funds first?

Kate Briddell: That would be a local decision that you would need to take into consideration with your financial folks. Crystal had said something about that earlier.

Amy Palilonis: This is Amy, I would say one consideration is that you can't start – if you're going to designate a portion of your FY '20 formula funds for COVID response, you can't start using that until the CARES Act have been spent down. That doesn't necessarily answer your question, but it's just a consideration when thinking about your spending.

Christine Campbell: Thanks Amy and Kate – so for this next question, if we can scroll back up to that slide with timeframes, we have a question of are we able to assist more than 26 weeks due to COVID?

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Crystal Pope: OK, just so – again, just to clarify on this, but regular – if you're using regular STRMU, it's 21 weeks, right. And if – and you can go above that 21 weeks if you are using – if you have asked for and are using the waiver to go up to 52 weeks. And if you're using CARES ACT funding, you can go up to 24 months.

Christine Campbell: We will be providing these slides so you will have that chart as a guide.

Emily Fischbein: We have a follow-up question to that, which is, with regular STRMU, clients are eligible up to 21 weeks within a 52 week period. If we use CARES Act funds, do we track it as part of the clients 21 weeks or do we track it separately, even if the client has not used their full regular STRMU of 21 weeks?

Crystal Pope: So the CARES Act funds that allow you to go up to 24 months does not have a period of performance like your regular STRMU funds. And so it – you can switch from one to another. And – so just repeat the last part of that question again, Emily?

Emily Fischbein: Does the – do the CARES Act funds need to be considered part of the regular 21 weeks?

Crystal Pope: Right, so no. They are completely separate. You will need to continue to track anything that you spend, expend, for that client with your regular STRMU, up to the 21 weeks, and you have a 12-month eligibility period, right. The 12-month eligibility period and anything that you have spent with regular HOPWA, STRMU, has absolutely no connection to the 24 months – to the up to 24 months that you can provide with CARES Act funding.

So potentially and theoretically, you could give someone 21 weeks -with regular STRMU you could find that they needed more assistance than that through your ongoing assessments. You could decide to use the waiver and continue them on regular STRMU up to the 52 weeks. And if they still needed more assistance, you can switch them to CARES Act funding and you could theoretically give them a full 24 months of STRMU assistance. That's probably not going to happen, but that is kind of the way it's staged.

Emily Fischbein: Thanks, thanks Crystal.

Christine Campbell: Do you know what the reporting will look like for HOPWA CV, will it be similar to regular reporting in the CAPER and APR forms currently used?

Crystal Pope: Kate, did you want to take that or you want…

Kate Briddell: I was just waiting to see if one of the OHH folks wanted to jump into this, but I think the answer is the guidance currently is that the reporting will be a separate APR and CAPER for your HOPWA CV funds. At present, there is no additional reporting needed at present.

Amy Palilonis: Yes, and this is Amy. As soon as we have more information on exactly what the reporting is going to look like, we're going to absolutely push that out to all of you.

Kate Briddell: Thanks Amy.

Rita Harcrow: Yes, and I'll – this is Rita, also just – we appreciate your patience on that. It's something that we are trying to work out across the board for reporting on CARES Act, so what – if you are a grantee that does have some other form of CARES Act, don't assume that what you have to report there will be the same as what we're doing for HOPWA. So, we're trying to work around a lot of obstacles as we try to push the money out first and network, having to work on some of the other aspects, so just stay tuned.

Emily Fischbein: Okay, here we have a question - Just for clarification, must we spend our CARES Act STRMU funds before spending any STRMU funds from FY '20 or assistance under a waiver from FY '20?

Kate Briddell: No, you – sorry Amy, go ahead.

Amy Palilonis: No, I was going to say – sorry if I caused confusion. That's only if a formula grantee is designated – designating a portion of their FY '20 funds for COVID-19 response in order to get the same flexibilities as the CARES Act. If they're doing that, they can only spend down that portion of designated funds once the CARES Act funds are drawn down.

Emily Fischbein: Thanks Amy.

Christine Campbell: This sounds like (inaudible).

Crystal Pope: For all of you project sponsors who may not get that, you may need to check with your grantee to make sure that they have actually set aside specific FY '20 funds for COVID-19 that would be in their Action Plan. Not all grantees have done that, by any means.

Christine Campbell: Well, this sounds like a one-off question, I think it's important because it talks about proof need – proofs needed, but they have a client that has a mortgage and was unable to pay the mortgage for a month due to a renter that he had leaving during COVID. What proof would he need to have in order to utilize HOPWA COVID money to assist with one month of mortgage payments to get him back up to date?

Crystal Pope: Well, you know, when you're doing an assessment, it is – it's not necessarily that someone has lost in income, although it – they may have lost the rental income they had. You'd be doing an assessment of how much money the person has right now, what their debts are, what their expenses are, and making a decision about that. The only thing that they would have to do to qualify, other than that assessment, is that they actually have that mortgage, what is owed on it, and so forth.

Emily Fischbein: OK. We have a question, and if it's not clear perhaps you can let us know and the requestor can clarify a little more, but we have a question can full rents be paid even though there is income in the household?

Crystal Pope: Well, I mean that would have to be – that would come from your assessment of their income versus their debts and bills to be paid. So there's no – you could certainly, in that assessment, just – and in that discussion with clients suggest that they pay a portion of whatever rents are due or you may decide that you need to pay all of it based on what the need is.

Emily Fischbein: Thanks Crystal.

Christine Campbell: So I'm going to ask this question but I also know that there may not be an answer yet, but I know a lot of people are thinking about it - is there intent that the waiver period will go beyond 5/2021 – 5/20/2021 and can you explain if there is not an extension how this can impact household receiving STRMU in 2021?

Amy Palilonis: So this is Amy, I can try to answer that. Right now, we don't really know, but as Rita started this call, we are trying to be as flexible as possible during these unprecedented times. And so there's definitely a possibility that there will be more waivers or waiver extensions in the future.

It's just right now it's sort of too soon to really decide that or to commit to that, but that's not – it's not out of the question and we're sort of designing our waivers in response to what's going on and also what we hear from you all about what is needed in your communities.

Christine Campbell: Thanks Amy.

Emily Fischbein: OK, I think this one is important to just reiterate for folks, because we seem to come across this question sometimes. Does a client need to verify that they were COVID-19 positive or their family had COVID-19 between March and December of 2020 in order to access CARES funds?

Kate Briddell: No. This is Kate again with my simple one-word answer. No, the client does not have to be and nor does their family member have to have tested positive in order to be impacted by COVID-19. We're looking at this broadly, and most communities are impacted by COVID-19 and most households have been impacted in some way by COVID-19, but you do not have to demonstrate that you tested positive for COVID-19 in order to receive benefits. Is there anything anyone else would like to add to that?

Rita Harcrow: This is Rita, I would just like to add to that as I started out talking about flexibilities, I mean, this is the time that we really do need to be flexible with our expectations in assisting clients. So I've heard some stories of households in – who are in need of assistance being required to get letters from employers about changes in income and have that notarized and that puts them in direct contact with multiple people unnecessarily, so do think about that as you're carrying out the work of your program.

Emily Fischbein: Thanks, Rita.

Crystal Pope: And I would just follow that by just reminding people again that probably right now more than any time flexibility in how you approach people's personal and financial situations is important.

We want you to still be following the base rules of the program, but I think there are a lot of things that are happening in people's lives other than just loss of income. But needing to use money for other kinds of things, and family issues, and just all kinds of things.

And so I would just say maintain as much flexibility as possible when you're doing these assessments, especially if the end result may be their instability and possible homelessness.

Christine Campbell: Thanks Crystal. This is the follow-up to our questions regarding when these waivers end. If a person is authorized prior to the 5/21 deadline, can STRMU assistance continue for up to two years past that date?

Crystal Pope: OK, I think somebody is mixing waivers with CARES Act. So the waiver – the 12 month waiver where you could go up to 12 months with your regular STRMU, that waiver right now ends on, what 5-21-21?

Christine Campbell: Right.

Crystal Pope: Is that right?

Christine Campbell: Yes.

Crystal Pope: And it has nothing at all to do with CARES Act funding in the 24 months. And right now – and Rita and Amy, you may have something to add to this, but the way we're interpreting the waiver right now, and the dates is that if you start someone using that waiver, any time up to that end date you can carry that assistance out to the 12 months from that starting date.

Amy Palilonis: Correct. Yes, as long as they're not exceeding the 52 weeks in a 52-week period.

Crystal Pope: Right.

Amy Palilonis: But if it's authorized before that end date of the waiver memo.

Crystal Pope: I mean, it's – everything about this is awkward, because you have those – you have a possibility of doing up to 12 months, but you've also got your regular 12-month eligibility period that you've got to keep in mind.

And so I think that is going to leave some people to then switching people over to CARES Act funding which does not have that ceiling on it. And people can be moved back and forth between these categories, and (they) may need to have to be kind of creative about that.

Christine Campbell: Thanks.

Emily Fischbein: OK, here's a pretty basic one about - is there a set date that all CARES Act funds need to be spent?

Amy Palilonis: So the CARES Act funds, just like regular HOPWA funds come with a three year period of performance. So it's – the period of performance is three years from the signing of the grant agreement.

Emily Fischbein: Thanks, Amy.

Christine Campbell: Can a participant get STRMU CARES assistance from one organization and HOPWA CARES assistance from another organization in the same month?

Rita Harcrow: I'm not sure I understand that question. So they're asking can they get STRMU from two different sources? Is it …

Christine Campbell: Sounds like the STRMU activity versus another HOPWA CARES activity, but they may be from two different organizations.

Rita Harcrow: I think that would depend on the kinds of activity. So they're getting STRMU from one organization, even up to their full rent or whatever it is they're getting under STRMU. And then they access, say, PPE or cleaning supplies from another organization, that would make sense. But I'm not clear how they would be getting STRMU (inaudible) paid by two different sources. So, I hope that answers the question – I'm going to try to see the question, if there's any more nuances to that.

Crystal Pope: Let me just add something to that, because we've had a few questions about – where grantees have added additional project sponsors doing STRMU, so multiple agencies doing STRMU within one EMSA, and they're all covering the same area.

And that's certainly allowable, but it's – it would be – it's always super important for those agencies to be working together and cross referencing their clients. Because what you don't want is for people to be – you know, getting funds from both agencies for the same time period, or – you'd have to have some rules locally that keep that from happening.

Christine Campbell: Thanks.

Emily Fischbein: We have a question, is there a waiver on using FMR? If so, how long is this waiver? Will the individual be able to continue to receive STRMU funded by CARES Act after the FMR waiver has ended?

Crystal Pope: So the FMR waiver – oh, I'm sorry, go ahead.

Kate Briddell: I was going to say there is an FMR waiver, but it doesn't have anything to do specifically with STRMU. Did you have other things you were going to say, Crystal?

Crystal Pope: Oh, no, I think that's just some confusion about the waivers. The STRMU waiver really has to do with rental assistance programs, not with the short-term assistance like STRMU. And there may be some programs that put limits on – put caps on their STRMU and will only help people whose housing fits within the FMR.

That's generally not a requirement. So, you can make your own decisions about that, but you are not influenced by that waiver at all when you're running a STRMU program, not by the FMR waiver. Thanks.

Christine Campbell: Thanks. To approve the use of CARES Act funds for STRMU, we have to provide documentation regarding how COVID affected the client's finances. Depending on the situation the client may not be able to provide official documentation such as paystubs or letters from former employers. If we make notes of how COVID affected the client's finances, will this be acceptable?

Amy Palilonis: Yes. Yes, if you're able to just note in their file how COVID has impacted them, I feel like that is consistent with the guidance that we have been providing.

Christine Campbell: Thank you.

Emily Fischbein: We have a question again which is about someone who has been receiving regular STRMU, and then can they use CARES Act STRMU. And the question is, if a client's spouse died before COVID and the client has been given HOPWA STRMU – regular STRMU, I presume, can the client still be eligible for CARES Act STRMU because the current loss of income has created a hardship with the increased (inaudible) household expenses?

Kate Briddell: Yes. Absolutely, you can go ahead and serve that client with STRMU.

Amy Palilonis: So the time limits for regular STRMU don't impact the CARES Act STRMU, so you could provide someone with regular STRMU assistance and then go on and provide them with up to 24 months of CARES Act STRMU.

Emily Fischbein: Thank you.

Rita Harcrow: And I would also add to that, if the question was about the documentation, or tying the use of CARES Act funds to COVID-19, that's still applicable to that particular case. Certainly it would be difficult to make up that lost income right now, with the unemployment levels that we are seeing related to COVID.

Christine Campbell: So, a participant is behind five months in rent, and pending sixth month. The household was unable to work due to contracting COVID-19. The property manager wants all the back rent which is a significant amount. The household is undocumented and has not been able to obtain help from local resources, and unable to return to work fulltime. (Inaudible) arrears is a significant portion of (their) STRMU budget, what might be the best way to proceed?

Amy Palilonis: I would say there's a lot there. It might need to be something that we work with you offline. I can put generally about – the guidance in the chat box about serving undocumented individuals, and it really depends on who is providing assistance whether or not you need to ask or verify that.

I mean, that being said, rental arrears are eligible to be paid using STRMU or CARES Act STRMU, as long as for the regular STRMU that period doesn't go over the 21 weeks in a 52-week period or longer if you're using the waiver. But for just this individual client, it might make the most sense, I think to put that in AAQ, I don't know if anybody else has any other input on that.

Christine Campbell: But, can you talk a little bit about having to use so much of your budget for one client because of some of the arrears?

Amy Palilonis: I mean, there's not really any limits on our side besides the time limits, and so it's really about your local program planning and decision making, and policies and procedures, if you're going to put caps on assistance, or if you're just going to follow the time limits.

I can't – I mean, paying for that much arrears is eligible as long as it's within the time periods. So I can't really say whether or not you should do that. It really just depends on the needs in your community and your priority setting, and sort of the policies and procedures that you're developing.

Christine Campbell: Thanks.

Emily Fischbein: Well, we have a question that I think may need a little more reassurance. If a client is receiving TBRA assistance ongoing monthly TBRA assistance, can they also receive STRMU assistance to help with utilities?

Crystal Pope: No. So that's something that people have continued to ask. There is no new magic with the – unfortunately with the CARES Act money that would allow an overlap between TBRA and STRMU.

And that includes paying utility overages that people are unable to pay. STRMU may not be used for that, same if somebody is receiving a housing choice voucher and unable to pay those – those are things that you would have to really look to other sources of assistance for.

Christine Campbell: A client applies for rental assistance due to loss of income because of COVID, but income is still above the 80 percent income guidelines for household size- are we able to assist?

Amy Palilonis: No. No, I mean, if the household is over 80 percent of AMI, then unfortunately they're not eligible for the program.

Rita Harcrow: And so, I don't know if this goes back to that PUA question if they're receiving certain types of unemployment, PUA is counted. But I'm really not sure if that's still being carried out because it was CARES Act, and I know that some of those unemployment sources have since ended. But as long as it's income that can be counted, then as Amy said, 80 percent is 80 percent. That's statutory.

Emily Fischbein: OK, we have a question that's a little bit different for a change, but it has come up – I've seen it come up before. What is the guidance on household repairs as a means to prevent individuals from becoming homeless, or their housing – preventing their housing from falling to substandard?

Amy Palilonis: So, unfortunately household repairs aren't eligible under STRMU, one way to be creative would be if – to pay for the entirety of the client's rent or utilities for a period of time to free up some of their funds in order to make the – those household repairs, but really the HOPWA money, it needs to be spent on rent, mortgage, and utilities and can't be used on those repairs.

But if there is a way to free up some of their income by paying their full rent in order for them to make the repairs – you know, if it's really causing the housing to be substandard, or unsafe, or there's just a need for these repairs, you could approach it that way.

Emily Fischbein: Thank you, Amy.

Christine Campbell: So we've had a couple of questions about being able to pay the full rent with STRMU versus – so can you talk a little bit about when you'd be using STRMU versus TBRA?

Amy Palilonis: So I guess the difference between TBRA and STRMU is that for TBRA there's a requirement that the assisted household pays a portion – you know, something towards their rent, meaning a percentage of their rent. So either 30 percent – it's typically 30 percent of adjusted income, and so – but if there is no income, then there is no client contribution towards the rent, I wanted to clear that up. As I was saying it, I could tell that I could be confusing people.

And then, for STRMU it's more needs based in how you determine the total rent paid, and there is no specific requirement that the client or the household contributes to their rent each month as they are receiving assistance.

And tenant-based rental assistance is considered permanent housing, more long-term. STRMU as in the name is more short-term, it's really needed to address more short-term financial hardship, or folks needing just a little bit of help for a shorter period of time in order to stabilize their housing.

I mean, there's ways to – if a household has no income at all then either for TBRA or STRMU you'd be paying the entirety of the rent. It's just that for TBRA if there is income, you are paying a percentage of that towards the rent. I don't know if I answered that question at all, but …

Christine Campbell: Thanks, Amy.

Emily Fischbein: We have a question that – someone is using funds to pay for hotel-motel, and then they're anticipating they might like to use STRMU after that, when that time period is up. And I think their question though, is they're having trouble finding affordable housing. So I don't know if we need more information, or if you have an answer – about how to use STRMU after hotel-motel assistance is up?

Crystal Pope: I think the only way you can do that is by using the recently released flexibility that OHH has provided, and I think they could speak to that as well, is that you would need to use PHP, permanent housing placement to put them in a unit, and then follow that by the use of STRMU for some period. That is not something that is generally been accepted as good practice, but it is being made available now as long as either the PHP or the STRMU is – comes from CARES Act funding.

There's a lot of – I think there's a lot that you have to do in those cases to be able to really be sure that somebody will be stable going forward, but we were thinking that people will run into those cases. And I don't know, Amy, if you or Rita want to say something more about that?

Rita Harcrow: Right. So that's the kind of flexibility that we're talking about. So really assessing that situation, looking at housing stock and seeing what's possible for that household.

If I understand the question right there's a real lack in your community of affordable housing units, and so someone might be in a hotel longer than we would normally want to see. But given the pandemic, that's also something that we've tried to offer as much guidance as we can about the importance of using those hotels-motels if necessary to keep people safe.

Kate Briddell: Great. Thank you, everyone. That's all the time we have today for our Office Hours Q&A for STRMU. Hopefully you all liked this format, and we will be doing more of these in the future for those topics that you indicated you were interested in.

Thank you all, again, for joining us today. We hope you can stay well, and we look forward to working with you in the future.

Amy Palilonis: Thanks, everyone.

END