

Collaborative Solutions, Inc.
Moderator: Valencia Moss
May 15, 2020
10:22 a.m. EST

SLIDE 1

Valencia Moss: Hello, everyone, and thank you for joining us. Today's webinar will begin promptly in two minutes.

Hello, everyone, Happy Friday. Thank you for joining us for the HOPWA/COVID-19: A Review of Notice CPD-20-05 CARES Act Instructions and Related Flexibilities for HOPWA. Today's webinar is being recorded and will be available for on-demand viewing immediately following today's presentation.

If you would like to download a copy of today's PowerPoint presentation, please select number 1 located in the links box and select Open. As we go through today's webinar, you will also be referencing Setting Up a Substantial Amendment for CARES Act Funding, which has also been uploaded in the links box, select number 2.

And lastly, number 3, the Notice for CPD-20-05 is loaded in the links box and will be referenced in today's webinar. You select number 3 and select Open.

If you have any questions that you would like to submit to our presenters, please use the chat box located in the left-hand corner of your screen. When we get to the Q&A portion of today's webinar, your questions will be answered in order.

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

Kate Briddell: Good morning. Collaborative Solutions is pleased to present this webinar and we're glad to have you all here today. Today's speakers are from the Office of HIV/AIDS Housing.

SLIDE 2

We have Rita Harcrow, Director of the Office of HIV/AIDS Housing, Amy Palilonis, the Senior Program Specialist at OHH, and Katie Pittenger, the Financial Operations Analyst. Monitoring the chat box today are, myself, Kate Briddell, and Crystal Pope from Collaborative Solutions.

SLIDE 3

Today's webinar objectives are to review the major provisions of HOPWA Notice CPD-20-05, issued May 8th of 2020, on the CARES Act Implementation Instructions and Related Flexibilities for HOPWA; to provide information about the May 4th, 2020 memo related to substantial amendments; to identify where webinar participants can go for additional information and assistance; and to answer questions.

SLIDE 4

Just a reminder, guidance related to funding and implementation of COVID-19 activities is evolving as new information and requirements emerge. HOPWA grantees and project sponsors should stay tuned on the HOPWA listserv and the HOPWA guidance for COVID-19 page on the HUD Exchange.

SLIDE 5

With that, I now turn things over to Rita. Go ahead, Rita.

Rita Harcrow: Hi. Thanks, Kate. Hi, everybody. This is Rita Harcrow, and I'm going to walk us through the first three provisions of the HOPWA notice on implementing the CARES Act.

And this is a reminder note. We've had several webinars before this one where we've answered questions and provided some guidance, and the information we had available at that time before the notice. So where there's updated guidance in this particular webinar, you'll see that in red on the slide.

SLIDE 6

In this webinar, I'll be covering the purpose, the award information, and the eligible activities provisions of the notice. OK.

SLIDE 7

The notice that was issued on May 8th is intended to: A, provide grantees the information needed to assess your funds, and B, provide grantees and project sponsors the information needed to carry out the work.

SLIDE 8

The CARES Act appropriation to the HOPWA program was \$65 million, to be used to prevent, prepare for, and respond to COVID-19 for HOPWA eligible households across the country. The CARES Act provided that those funds would be distributed to formula grantees and to competitive renewal grantees.

For formula grantees their allocation is based on sharing of \$53.7 million using the 2020 formula metrics. The competitive grant allocations are based on sharing \$10 million divided up in proportion to the current renewal grant awards. In addition, the CARES Act provided that 2 percent of the total CARES Act HOPWA appropriation would be used for technical assistance.

SLIDE 9

So what can grantees do with CARES Act fund? The general provisions include that, A, funds are to be used to maintain operations, and that provision is in line with an anticipation of additional costs that you might experience in the community related to carrying out the work of HOPWA during the pandemic, and during a recovery when more households are eligible, when your clients are able to pay less of their share due to their lost income.

And then, funds may also be used, B, to carry out any HOPWA eligible activity, but it has to be done in a manner that addresses the community needs related to the pandemic. And C, additional provisions allow funds to help in separating households for isolation when it's needed. And finally, D, CARES Act funds can reimburse costs the grantee incurred as early as January 21st, when the cost is related to preparing for or responding to COVID-19.

In previous webinars, we've advised grantees can use either non-HOPWA funds or your current HOPWA awards to pay for COVID-19 activities now.

And then, later, you'll be able to reconcile those costs back to the CARES Act award.

And I just wanted to plug a reminder here that that is an availability to your community to assist people who need it right now before your CARES Act funds are in your line of credit. Just please keep documentation of those costs, documentation of your intention to reallocate those costs later. And later, be sure to just be able to show us that's what you did.

SLIDE 10

This is not an exhaustive list of how to use the CARES Act funds, but an idea of how you might want to use the funds. And this is in addition to continuing your operations in a greater quantity to assist those newly unemployed or newly eligible households.

So additional things you might want to consider, things like hotels or motels to separate families that you're assisting when isolation is required.

Transportation – that might not look like your normal transportation. So that's things like gas cards, paying for private vehicle mileage, or even medical transport, that might make sense now instead of a bus pass or other mass transit.

Helping households with basic requirements like nutrition, and that could be in the form of meal delivery, that's Uber Eats, food cards to shop online for grocery delivery, things that we all need right now to remain safe.

Access to medical care and medication assistance, expanded case management to help people navigate all these services that look different now during the community stay-at-home order, and things like cleaning costs and supplies, even personal protective equipment, like masks and gloves for your staff and your client households, as well as teaching them how to use it.

SLIDE 11

So from what date are those costs allowed? For CARES Act funds, eligible costs can be reimbursed as early as January 21st, and that's with documentation showing those costs were directly related to your communities' prevention, preparation for a response to COVID-19.

And the documentation for that might include things like meeting notes, case notes, e-mails, board minutes, those kinds of things related to your planning and expenses that you incurred during that time before your grant arrived.

SLIDE 12

The CARES Act is a federal response to a national disaster. And that means, many programs across the federal government are being allocated funds, all at the same time, all to assist the same communities in this emergency response. That means we have to be careful not to duplicate the same exact services to the same exact household.

So, how will you as a grantee make sure this doesn't happen? We do expect you to develop some procedures to prevent that, and HUD's working on additional guidance across all our programs to assist with that expectation. But in the meantime, you should assess and document what other resources are available in your community now, how you're working together, and determine policies on how you and those other programs are maximizing those resources to benefit your clients without duplicating.

SLIDE 13

Several of the next provisions on the eligible activities mention this option, this new one here in red, for HOPWA formula grantees. For formula grantees who expect they might use all of their CARES Act funds for COVID-19 costs and anticipate they might need more funds to respond to COVID-19, there is an allowability to designate a portion of the FY 20 formula allocation for COVID-19 purposes. And when a formula grant does this, it allows you to use the '20 formula funds in a manner that you've used the CARES Act award. The FY 20 funds though, should just be used after the CARES Act funds are expended.

Communities may determine the need for FY 20 funds to be used that way in their FY 20 plan. If you're forecasting that you will have that need, you could go ahead and put it in the plan, or if you determine later that you need additional funds as your CARES Act funds run out, then that would be an amendment to the FY 20 plan.

The portion of FY 20 funds identified and approved for COVID-19 response will benefit from the same benefits and flexibilities that we're talking about in the CARES Act.

SLIDE 14

CARES Act funds have an increased administrative cost cap. So Congress recognized the need to allow for higher costs of managing a new grant during an emergency situation and while everybody is working remotely, and also, administrative costs associated with getting funds contracted quickly to providers, and assisting people who need the support as soon as we can.

The CARES Act allows for a 6 percent cap for grantees and 10 percent cap to project sponsors for the CARES Act funds, and also for those FY 20 formula award amounts designated for COVID-19 response.

SLIDE 15

Short-term Rent, Mortgage and Utility assistance paid by the CARES Act can assist households in preventing homelessness for up to 24 months, instead of 21 weeks. The 24-month limit also applies to those FY 20 formula award amounts designated for COVID-19 that we've talked about.

But remember, all the other requirements for STRMU are the same, and that's ensuring that funds assist a household in maintaining their current residence and ensuring that households have access to case management and supportive services as appropriate.

SLIDE 16

Hotel/motel stays. Again, this slide describes that CARES Act funds may be used, as well as that portion of the FY 20 formula funds that are designated for COVID-19 after the CARES Act funds are expended.

Hotel/motel costs are generally allowed for HOPWA eligible households already. But with this CARES Act provision, the hotel or motel may be used to lodge one or more household members that are not HIV positive in order to achieve isolation, so to separate the household, and that's intended to protect the health of the people living with HIV within that same household. Reminder, this cost should be billed in the leasing budget line item.

OK, and now, I will turn the presentation over to Amy Palilonis who will tell you more about how to execute your grant agreement and other provisions of the HOPWA implementation notice. Amy?

SLIDE 17

Amy Palilonis: Thanks, Rita. I am going to walkthrough what the notice says about grant agreement execution, plan requirements, reporting, and technical assistance. And I'm going to start with the requirements and information for formula grantees.

So all formula grantees will sign a grant agreement in order to accept the CARES Act supplemental funding from HUD. Each field office will provide the grant agreement to their respective formula grantees and will inform them of the process for executing it.

SLIDE 18

This slide shows the steps formula grantees must take to receive the supplemental CARES Act allocation. Each formula grantee must submit to HUD for review: a signed form SF-424 and SF-424D, the Certifications at 24 CFR Part 91.225(a) and (e), or 24 CFR 91.325(a) and (e), as well as a substantial FY 2019 Action Plan amendment that meets the requirements of 24 CFR Part 91 and the recently published notice.

The waivers HUD published allow a grantee to provide no fewer than five calendar days for citizen comment, rather than the usual 30 days for each substantial amendment. We included a link to that waiver memo further along in your presentation, and you'll see that when we talk about the waivers.

Each grantee should post the approved substantial amendment on its website with a summary of citizen comments received within the comment period.

SLIDE 19

Each substantial amendment that grantees submit to HUD will be subject to the review process set forth in 24 CFR 91.500. HUD is intending to expedite its review of the submitted substantial amendments.

If the substantial amendment is not disapproved by HUD, both HUD and the grantee will sign the grant agreement, and then HUD will establish the grantee's line of credit in the amount of funds included in the FY 2019 Action Plan substantial amendment, up to the grantee's supplemental allocation amount.

SLIDE 20

Something new that is included in the Notice and that Rita already covered briefly, is that HOPWA formula grantees also have the option to designate a portion of their FY 2020 regular HOPWA allocation to COVID-19 response.

The Notice states that HOPWA formula grantees may use a portion of their FY 2020 allocation on allowable activities to prevent, prepare for, and respond to COVID-19, including the provision of personal protection equipment. And they can do so if they carry out the following actions:

The COVID-19 activities are identified and approved in their FY 2020 Annual Action plan and – as Rita mentioned, and all CARES Act funding has been expended first. Grantees with previously approved FY 2020 Annual Action plans may amend their AAPS to include such activities and resubmit for approval.

And all FY 2020 formula funds used for COVID-19 response will receive the same benefits and flexibilities as CARES Act funding for administrative costs, STRMU, and hotel/motel stays as the ones described in the notice.

So, the portion of the FY 2020 regular HOPWA allocation that is used for COVID-19 response will have the same increased caps on administrative costs, the increased time limit for STRMU, and the flexibilities for hotel/motel stays. They'll have the same flexibilities as the CARES Act supplemental funding has.

SLIDE 21

So that was the grant agreement and plan information specific for HOPWA formula grantees. I'm now going to talk about competitive grantees. We are

actually planning a CARES Act webinar specifically for competitive renewal grantees next week.

It looks like it is going to be on Wednesday, May 20th at 4:00 P.M., Eastern. We will be sending the registration info for that competitive grantee specific webinar through the listserv. So please look for that if you are a HOPWA competitive renewal grantee.

Competitive grantees will sign a grant agreement in order to accept the CARES Act funds from HUD. To initiate this process, each competitive grantee should submit a descriptive package to the office of HIV/AIDS Housing that includes a brief description of the planned uses for the grant funds, within 15 days of the publication of the notice, so by June 1st, 2020. This should be sent to the HOPWA e-mail box which is HOPWA@hud.gov.

And the competitive grantees will also need to submit a completed HOPWA budget form, which is the HUD 4110-B, as well as completed forms SF-424 and SF-424D. The brief description of planned uses of the grant funds should include the following information:

It should list the type and amount of each eligible activity the competitive grantee anticipates carrying out with the CARES Act funding, the process the grantee will use to carry out the work quickly, and how eligible households will access the assistance during any time the grantee's main operations are closed due to local public health directives.

Just to reiterate, the competitive grantee's submission is due to HUD within 15 days – 15 business days of the publication of the notice, so that would be June 1st, and this submission is to be sent to the HOPWA e-mail box which is HOPWA@hud.gov.

SLIDE 22

So for the review process on HUD's end, Office of HIV/AIDS Housing will review the descriptive packages submitted by competitive grantees using the following process: HUD will expedite its approval or disapproval of the descriptive packages.

HUD recommends that jurisdictions with disapproved descriptions revise and resubmit within 15 business days after HUD sends the first notification of its disapproval. And HUD will expedite its approval or disapproval of the revised descriptions after receiving the re-submission from the competitive grantee.

After the submission is approved by the Office of HIV/AIDS Housing, OHH will forward the approved submissions to the respective field offices. OHH will inform the field offices when the grant agreement may move forward for execution, and local HUD field offices will re - inform their respective competitive grantees of the process for executing the grant agreement after the grantee description is submitted, reviewed, and approved by the Office of HIV/AIDS Housing.

SLIDE 23

So just a little bit more on the expectations for competitive grantees. So, competitive grantees are expected to continue implementing their current permanent supportive housing renewal grant, as approved by HUD.

The supplemental grant funding under the CARES Act is not required to be spent on permanent supportive housing activities. Rather, it can be used for eligible activities outlined in the HOPWA regulations in accordance with the CARES Act and the implementation notice. It is expected that the activities undertaken with the CARES Act funding will be necessary actions in order to prevent, prepare for, and respond to COVID-19.

SLIDE 24

The Notice laid out some expectations for both formula and competitive grantees for their project sponsor agreements. Grantees are expected to execute new or amend existing project sponsor agreements for the supplemental grant funds within 14 calendar days of the execution of the formula or competitive grant agreement.

This is just a reminder that the HOPWA regulations specifically state that the selection of project sponsors under the HOPWA program is not subject to the procurement requirements in 2 CFR 200.

SLIDE 25

As Rita mentioned earlier, the CARES Act provided \$1.3 million in technical assistance funding to existing TA providers for capacity building around COVID-19 preparedness and response. The TA funding provided under the CARES Act will be used for the development of webinars, resource guides, and other TA materials to assist grantees in administering the supplemental grant funds, and implementing activities related to COVID-19 preparedness and response.

If you are a grantee and you think you would benefit from some individualized TA related to responding to COVID-19, or just for regular HOPWA program administration, you should submit a technical assistance request via the Request Program Assistance webpage on the HUD Exchange portal.

The link to request the individualized technical assistance is on the slide. And in the TA request submission process, you should select HOPWA: Housing Opportunities for Persons with AIDS as the topic and write “Health Preparedness Response” in the subject line.

SLIDE 26

So the Notice contains some information related to reporting, both for CARES Act funds, as well as information on available extensions for just the regular APR and CAPERs that are due within the next six months.

So for the CARES Act funds, grantees will report information to HUD on the use of the CARES Act funds including, the number of individuals assisted with the CARES Act funds and the types of assistance provided.

Reporting will be through the HOPWA APR/CAPER or through a similar combined data collection instrument to be specified by the HUD. The reporting requirements are still being finalized. But this is definitely something that we will push out a lot of guidance on, and more information on that will be forthcoming.

The Notice also included information on APR and CAPER submission extensions. So any HOPWA grantee with a CAPER or APR due to HUD

within six months of the date of the Notice may have up to a 90-day extension to submit their APRs or CAPERs. This extension will allow a grantee to submit their APR or CAPER within 180 days of the end of their program or operating year.

Any grantees that wish to utilize this extension should submit an e-mail to HOPWA@hud.gov and notify their local HUD field office that they wish to use this extension for the submission of their APR/CAPER.

SLIDE 27

There will be some additional CARES Act reporting requirements for grantees that receive \$150,000 or more in CARES Act funding. All recipients of \$150,000 or more of CARES Act funding must submit a quarterly report to HUD containing information regarding amount of funds received, the amount of funds obligated or expended for each project or activity, a detailed list of all such projects or activities with a description for each, and detailed information on any subcontracts or sub-grants awarded by the grantee.

The content and format for this reporting is still under development. HUD is working with the Office of Management and Budget to ensure this requirement can be fulfilled by grantees in a manner that utilizes existing reporting streams to the greatest extent possible. Some more information will be coming out about these additional reporting requirements as we have it.

SLIDE 28

So as many of you know, HUD released a Memorandum discussing the availability of regulatory waivers of certain HOPWA and other CPD program requirements back on April 1st of 2020. The link to that waiver memo is included on this slide.

Grantees may make use of the regulatory waivers by notifying their local CPD director by e-mail to their specific COVID-19 email address two days before they anticipate using any of the waiver flexibilities. And if you haven't checked out that waiver memorandum yet, you definitely should do so, again, with the link that's provided on this slide.

We are expecting to issue more waivers, really, in response to COVID-19 related needs that have identified – that have been identified by grantees and our TA providers. And we're also planning on issuing guidance on the administrative flexibilities provided by OMB.

So, any additional waivers that we will be publishing, as well as any additional guidance related to those OMB flexibilities will be made available on Hud.gov at the link provided on this slide, as well as sent out via the HOPWA mailing list.

SLIDE 29

So any questions that you may have related to the HOPWA Notice, waivers, or HOPWA program guidance related to the implementation of COVID-19 activities should be directed to our HOPWA Ask A Question portal. The link to that is on this slide. And in step two of the question submission process, you'll need to select HOPWA: Housing Opportunities for Persons with AIDS.

So, that's it for my portion of this presentation. I am now going to turn it over to Katie Pittenger who is going to tell you more about the recently released HUD memorandum on CARES Act Flexibilities for ESG and HOPWA Funds Used to Support Coronavirus Response and Plan Amendment Waiver. Katie?

SLIDE 30

Katie Pittenger: Hi, there, yes. Can you hear me?

Amy Palilonis: Yes.

Valencia Moss: Yes, we can.

Katie Pittenger: OK, great. Thank you. All right. So as Amy mentioned, the next few slides are on the memo HUD published on May 4th, on CARES Act Flexibilities for ESG and HOPWA Funds Used to Support Coronavirus Response and Plan Amendment Waiver – that's a mouthful.

SLIDE 31

All right, so this memo covers flexibilities for ESG and HOPWA formula funding and plan amendments. It advises HOPWA formula grantees to prepare plans as soon as possible. Grantees have the option to submit a brand new plan for 2020, but HUD recommends amending the most recent plan with a complete HUD review. So for most of you, that's the 2019 plan. Amending the most recent plan provides for expedited HUD review process.

SLIDE 32

The memo includes a very detailed IDIS instructions attachment called Setting Up a Substantial Amendment for CARES Act Funding. This document came out on the listserv on May 7th, and I believe it's also provided in the links in this webinar. But if you're not able to – I saw some questions in the chat, if you're not seeing this, we'll make sure that you get access to this document.

This is the guide that formula grantees will use to set up their amendments and go through the amendment process. Please review it even if you have submitted plans in the past and are very familiar with the screen. Hopefully, some of you joined the webinar yesterday reviewing these IDIS instructions for amendment. A link to that presentation should be coming out on the listserv very soon.

SLIDE 33

Grantees should work with their field office to submit an amendment on the correct plan. If you are getting CARES Act funding from multiple CPD programs, you can submit one amendment for all grants at the same time, or, submit them separately. IDIS instructions in the webinar yesterday give a lot more information on that process. Once HUD completes the review and the amendment is accepted, the grant agreement will be issued.

SLIDE 34

So for formula grantees, they will need to submit the SF-424, the SF-424D, and Certifications, and load those into IDIS. As Amy mentioned earlier, the competitive grantees also need to submit the SF-424 and 424D with their submission package.

Formula grantees must also upload a summary of the citizen participation efforts, and a summary of the comments and views and any reasons why the views were not accepted. Again, the IDIS instructions go into more detail on how to upload these documents. The Con Plan Desk Guide is also a helpful document to you for navigating this process.

SLIDE 35

So we've gotten quite a few questions on completing the SF-424, so we thought it might be a good idea to just run through these clarifications quickly. This slide deck is in the links as well, but this might be a (inaudible) screenshot.

So, for the SF-424, you need one SF-424 for each CARES Act grant. So if you're also receiving ESG CARES money or CDBG CARES money, each of those will need to be separate. This is an application that is new, and we'll be using the standard CFDA number for HOPWA.

The funding opportunity number and title should reflect the notice that Rita and Amy discussed earlier. The information is here for that. And then, for the proposed date, the start date should be the grant term start date, which should be after the funds are in place. We realize that that is an estimated date since the grant agreements aren't yet signed.

For the end date, it should be three years after the estimated start date. And this is just a reminder to folks that both HOPWA formula and competitive grants are three-year grants, and the CARES Act grants are also three-year grants, with the start date of the period of performance being the date of execution of the grant agreement.

And we've had a couple questions about this - there is no penalty for spending faster than those three years.

Excuse me. For estimated funding, we expect to see the full CARES Act award on lines A and G, and for signing the grant agreements it can be signed electronically, but a wet signature should be on file locally.

SLIDE 36

So just to wrap up this section, use the memo in the attachment to submit formula plan amendments. As we said, grantees can choose to add CARES Act to funding to a new plan, but it is recommended to amend the most recent plan with a complete HUD review. And of course, there is more information coming in future webinars.

I think that's it. So I think it's going back to Kate.

Kate Briddell: Yes, thanks, Katie. And I think we had some questions. Crystal?

Crystal Pope: Yes. And there's one in particular, Rita, I think we wanted to clarify about, you know, we talked in this presentation about setting aside a portion of FY 2020 funding for COVID-19, and somebody asked whether they also would be setting aside FY19 money for COVID-19.

So, and really the – and, Rita, you can correct me if I'm wrong. But the substantial amendment for FY 2019 is, actually to accept the CARES Act funds and to explain how that will be used. People will be using some of their FY19 money just as the regular – in the regular delivery of their services for things that are related to COVID-19, but it is not designated as anything that's separate or has special conditions on it.

Rita Harcrow: Right. And it's really tricky because we're using the numbers 19 and 20 a lot, when we talk about all of these situations with COVID-19 and the FY19 AAP being amended.

So, if the question was – so I know some of the other programs like, I believe, ESG, they were able – because of the way their CARES Act provisions were worded, grantees could go back and forward in designating their COVID-19 response and getting those other benefits that are associated with the provisions.

For HOPWA, the provision only goes forward. So we –for HOPWA benefit from the CARES Act funds and the provisions that go along with the COVID-19 response are applicable to that pot of money, and then to – the pot of

money that's designated in FY20 formula funds, specifically, in those community planning processes.

So, it's just – like Crystal said, your FY19, whatever you're using currently, you can carry out the regular activities you're already doing. And I assume you're already dealing with folks who are experiencing, you know, issues related to COVID-19 and using your regular budget line items you already have in play, but not with those added flexibilities of the CARES Act provisions. So I hope that's helpful.

Crystal Pope: Great, thank you. Kate, do you want us to continue with questions or did you want to go through the rest of the slides?

SLIDE 37

Kate Briddell: I think we should go through the rest of the slides. Thank you.

Crystal Pope: OK.

Kate Briddell: Yes. So we want to make sure that everyone stays informed, like we said earlier, guidance is coming out quite rapidly. So all of the guidance for formula grantees and project sponsors related to infectious disease preparedness and response and COVID-19 will be sent through the HOPWA mailing list.

So if you are not a subscriber, please make sure you subscribe. Enter the requested contact, your contact information, and select HOPWA, and then select subscribe. Updates on HOPWA guidance for COVID-19 is also available on the HUD Exchange. There is a HOPWA COVID landing page.

SLIDE 38

Finally, some resources, these slides have hot links to the guidance webpage that we just mentioned. The waiver memorandum from earlier in the month, the CPD director contact information for those of you who are going to be exercising those waivers, also the information about your allocations for the CARES Act funding, and then the Notice that we just spoke about today.

SLIDE 39

Also, please be reminded, you can get answers and get assistance through the AAQ and TA requests. So, for answers, go to the HOPWA Ask A Question portal and ask your questions that are either program policy or COVID related.

And you can get technical assistance on implementing your COVID response. So from planning, program development, problem solving, anyone needing TA assistance, any grantees to manage your COVID related response, submit a request online. And again, these slides will be coming out with hot links.

SLIDE 40

And now, we've reached the end of our slides and can move on to additional questions. Crystal?

Crystal Pope: Great. Thank you. So we have a number of questions. We'll try to get through as many as we can. One to start with is from a HOPWA competitive grantees that's receiving two separate awards. Katie, people wanted to know how many of the SF-424 forms they need to submit?

Katie Pittenger: Yes, thank you. So, HUD's accounting department will need a separate SF-424 for each CARES grant. So there are a handful of HOPWA competitive grantees that are receiving multiple awards. So that will mean separate SF-424s will need to be submitted. And I think that we'll probably be going into that in a little bit more detail on the competitive specific webinar. I think that will be happening next week.

For formula grantees that are listening that might sound a little different than what you've heard in the past. So for ESG and CDBG, they have grantees receiving multiple tranches of funding, but they're also dealing with a single grant number.

But for these very specific HOPWA competitive grantees, they're actually separate grant numbers, and so we will need separate SF-424s. And our office will be reaching out to those specific grantees to make sure that expectation is clear. I hope I answered that clearly.

Crystal Pope: Great. Thank you.

Kate Briddell: Thanks, Katie. We have another question. When – will we need to do separate CAPER reports for CARES Act funding? If it will be a different form, do you have advice on what information we should have our sponsors track now before we know what will be required?

Amy Palilonis: This is Amy. I can take this question. So a lot of the reporting requirements are still being worked out, and we're trying to get those worked out as quickly as we can and we'll definitely push all of that guidance out when we have it. We do know that all grantees will report information to HUD on the use of their CARES Act funds.

Just some of the basic information that will definitely be collected will be the types of assistance provided and the amount spent on each CARES Act funded activity, as well as the number and demographics of individuals assisted with the CARES Act funding.

We're not sure exactly sort of how this will be collected yet. So reporting will either be through the regular HOPWA CAPER or APR, or through similar combined data collection instruments. But again, that still needs to be worked out and more guidance will be provided on that as soon as we have it.

And then, again, as I had mentioned earlier, all grantees that are receiving \$150,000 or more of the CARES Act funding will also have an additional requirement to submit a quarterly report containing information regarding the amount of funds received, the amount of funds obligated or expended for each project or activity, a detailed list of all the projects and activities with descriptions, and then detailed information on any sub-contracts or sub-grants awarded by the grantee.

Again, we're still working on the format for this and we are trying to make it as, you know, least burdensome as possible on all of you, and we'll definitely be pushing out guidance about that once that's more fleshed out and finalized. So stay tuned.

Crystal Pope: Great. Thank you, Amy. And the stay tuned that you keep hearing, really, emphasizes how important it is to keep up with guidance as it's changing, and HUD has really been trying to respond to some of the requests that came in right after all of this started (and) after the first waivers came out.

And so, a lot of things have – and – you know, are being developed and have been developed as a result of what grantees and project sponsors are asking for, so you will still see some changes going forward.

Another question that we have is, do we need to keep separate records for CARES Act fund expenditures, or can we combine these expenditures with our normal HOPWA line items, like for STRMU and supportive services and so forth?

Katie Pittenger: I can answer that one. This is Katie. So these funds – CARES Act funds should be separate and should be treated as a separate grant under Grant Based Accounting, and that includes setting up separate projects and activities in IDIS. And we'll be giving out some more IDIS – HOPWA IDIS specific guidance soon for both formula and competitive grantees that include activity setup.

In the meantime, though, grantees should be thinking about this money as a separate stream of funding. And if it's possible – it's not required, but it's a good idea to try to separate out the CARES Act funding on a separate voucher, just so it's easier to sort, group, and track and identify when you're looking at this information later.

And if you have questions, send those through to AAQ, especially, if you are trying to figure out how to tease this out, if you're amending existing contracts with project sponsors, you know, that's something that folks are trying to think through.

Crystal Pope: Great. Thanks, Katie. There's another question here. If we designate a portion of our FY 2020 allocation for COVID-19 response and include this in our 2020 AAP, but later find we need to designate additional 2020 funds for this purpose, would that be possible? It's difficult to gauge how much we need at this point.

Rita Harcrow: Hey, this is Rita. I'll try to answer that - this is in line with what Crystal and I were talking about earlier. So the designating of the 2020 formula funds, designate a portion of that that's new, and, again, it can be a little bit tricky, especially, now, trying to – agreed- it's difficult to gauge and try to figure out what the needs might be over the next year or two years or more.

So, yes, you can, you know – if you've already been using funds that – you know, your separate non-HOPWA funds or your current HOPWA award that you intend to move to your CARES Act award and you can already see, OK, we're going to likely use this money pretty quickly and we might need more, that's fine, if you want to go ahead and have those discussions for your planning process.

But if not, and something happens later and you identify that need, then you could reach out to your field office and discuss how to walkthrough that amendment process. So, you know, there will be options available and we're, again working on more guidance for all of those things, and that will be one of the – certainly, one of the areas that we want to make sure that we're providing good guidance and information about that.

And, do we have any other questions?

Crystal Pope: Yes, we have a few. This is a question about the use of CARES Act money in conjunction with regular HOPWA funds. And it reads, can current clients receiving TBRA assistance, meaning, on their regular – through their regular HOPWA program, who have lost income through loss of employment be assisted with the COVID HOPWA funding, meaning the CARES Act funding? There might be insufficient funds to assist them through the current contract since the extra financial support was not anticipated - which is a very good question.

Rita Harcrow: So I'm not sure if I understand. Is the question, assisting with a higher portion of their rent portion, or what other – or other ...

Crystal Pope: Yes.

Rita Harcrow: ...sorts of activity – OK.

Crystal Pope: So this would be how to use TBRA under CARES Act funding to supplement your program. And so, in this case, a – the program did not anticipate paying so – such a great portion of the rent or, you know, that people would lose so much income during this time, and so the HOPWA payment goes up and they may not be able to keep up with that. And that would be a way that they could use the CARES Act TBRA dollars if they've designated those to help cover that increased cost.

Rita Harcrow: That's exactly right, and that was one of the anticipated expenses that communities might face. If you have a strong TBRA program, and suddenly, many of your assisted households are not able to pay the share of rent that you were used to them paying, that's going to be a cost burden on your HOPWA program, so the CARES Act can accommodate for that.

So I don't know if that answers the question. I think there are some nuances there about, do you – do you have to pay a portion of the CARES Act and a portion out of the regular HOPWA and – you don't. I mean, you could – you could certainly pay whatever portion of the grant needs to be paid, even out of your HOPWA funds that you already have in place. But still keep the TBRA funds and assist households out of that money as well ...

Crystal Pope: Right.

Rita Harcrow: ... just to keep the – yes, just to keep the accounting easier. So there would not be an expectation you have to tie it together that way.

Crystal Pope: Right. I think that there is some confusion on some people's part about exactly what the CARES Act funds can be used for. And, just as a reminder, any of the HOPWA eligible activities could potentially, if you identify those as COVID-19 related needs, could be covered by your CARES Act money.

Rita Harcrow: That's right.

Crystal Pope: You know – right. And, but most of what you're hearing people talk about are the extra (kinds) of things and things related to infection control and food

delivery, and other things like that. But, do remember that it can cover these other regular activities that get extended.

Rita Harcrow: Right. And that's part of the expectation is that, you know, you may just see your people that you're already serving hit pretty hard economically right now and they need additional support and the CARES Act can come in and support in that way, including things like that longer STRMU assistance.

You know, it's just anticipated that you will have needs in your community. And part of the process of figuring out how you're going to use your CARES Act is to try to assess what those needs are and what other resources are not able to pick up.

Crystal Pope: Right.

Rita Harcrow: So it could certainly be TBRA, it could certainly be additional supportive services, like I mentioned earlier, case management might become more complicated now, as you're trying to navigate a new web of resources and navigate them remotely. So, those are normal activities that you're likely already doing, but additional money might be needed to carry them out in this current climate.

Crystal Pope: I also think that a couple of questions have come in about the three-year time period for the CARES Act funding, and even asking whether the funds need to be spread out equally throughout those three years. So I think we'd like to clarify that that is a three-year maximum and not an expectation that necessarily it will last for three years.

Rita Harcrow: Right.

Crystal Pope: And ...

Rita Harcrow: Spend it now - we actually hope, you know, costs have already been, you know, used that - you're already paying for things that you will later reconcile to this funding, because the crisis is now.

We don't know what it will look like in two or three years. But, no, there's not an expectation that you have to divide it up equally or plan in that kind of way. And the funding can be used on a shorter-term.

Crystal Pope: Right. And just remember, if you're using – if you're designating FY 2020 HOPWA funds for COVID-19, that can't be – that cannot be done until you've used up all the CARES Act money, which is another reason to use it as it's needed.

Another question is, do you recommend that we keep separate beneficiary records for those individuals served with CARES Act funding?

Rita Harcrow: So I would think that you – some of your CARES Act funding will support households that you're already serving. So I would not expect that you would have a completely separate record for that household just for the CARES Act funding.

But as was mentioned earlier, there will – you'll need to have some tracking even to show for the same household who benefited or a number that benefited from some of the CARES Act provision. Do you think that answered the question, Crystal, or if you want to read it again, or if there's others ...

Crystal Pope: No, I think that was ...

Rita Harcrow: OK.

Crystal Pope: Got it. Thank you. And I know that we're coming up on the end of the hour. Kate, did you have any additional questions that you had seen?

Kate Briddell: I just have another one, and I know that Amy had touched on this before. But, the question is, how will grantees be informed if their amendment has not been disapproved, and is there a timeline?

Katie Pittenger: This is Katie. I can jump in on this one. So, this will be a communication with the field office, so the field office will be reaching out. So your local CPD rep will be the one that will be in communication with you on that.

Kate Briddell: Terrific. Thanks, Katie.

Crystal Pope: And I was just going to say, because there are a number of other questions in here that are related to some very specific, you know, where do we charge certain types of things, and PPE, and other program implementation questions like that.

And because we cannot get to all of those, just a reminder that everyone is welcome to use the HOPWA AAQ which can be accessed through the HUD Exchange. It's there for project sponsors and grantees and interested parties to get more information, get answers to simple questions, or even more complicated ones.

So, we would encourage you to use that – the link to get to the HOPWA AAQ is in one of the resource slides here and the slides, Valencia, if I'm correct, will be sent out automatically to everybody after ...

SLIDE 41

Valencia Moss: Correct.

Crystal Pope: Yes.

Female: (Thanks).

Rita Harcrow: And then, Crystal, the webinar will be posted later too in total, right?

Valencia Moss: That is correct.

Crystal Pope: Right ...

Valencia Moss: ... both webinars and handouts would be available at the same time.

Rita Harcrow: OK, because I saw a couple of questions about slide delays not matching up with the content, and I think we're – you know, we're all working from home and on different internet systems, so I think there's just been some delays. But hopefully, that will clarify it if people can go back and watch.

Crystal Pope: Exactly. And then it will be – it will be also posted on the HUD Exchange in – Kate, I don't know how long that takes.

Kate Briddell: It usually takes about a week.

Crystal Pope: OK.

Kate Briddell: OK. Well, thank you all for this great information. And, folks, again, I changed the slide back to the AAQ and TA requests. So, again, there's the link for the AAQ.

And if you – your community needs some assistance in implementing planning program development, problem solving around how to use these CARES Act funds, please ask for some technical assistance. We and our other partner firms are happy to assist you.

So, again, thank you all for joining us today. Stay well and we look forward to working with you in the future.

END