

Steve Ellis: Hello, everyone. Welcome to today's HOPWA webinar on The Clarification of the Rent Standard Requirement for the Housing Opportunities for Persons with AIDS Program.

Before we go into some introductions, just some quick housekeeping. So, please feel free throughout today's webinar to use the chat feature for any comments about rent standards, any questions about rent standards.

As you might have seen on the last webinar—and you'll see at the end of this webinar—we are also planning an office hours on this topic in early August. So, any information, any questions you have for this topic would be much appreciated in the chat box.

So, particularly then, we expect a high number of questions. So, as always, we may not be able to get to every question today. But we will make sure to either follow-up after today's webinar or we will make sure to include it in the next office hours.

Also, a housekeeping note. We will make sure that all materials are available after today's presentation. The slide deck can be sent out immediately after today's presentation and the recording, slide decks, and transcripts will end up on the HUD Exchange in just a few days as soon as they can. So, people who need to review this later on have the opportunity to do so.

So, my name's Steve Ellis. I'm a Senior Analyst at The Cloudburst Group. I'm joined today with my coworker, Heather Rhoda--

Heather
Rhoda:

Hello.

Steve Ellis: --also from The Cloudburst Group. I will throw it over to the Office of HIV Housing to introduce themselves.

Amy Palilonis: Hello, everyone. I'm Amy Palilonis. I'm the Deputy Director of the Office of HIV/AIDS Housing. Also, with me actually in the room today is Rita Harcrow, the Director of the Office of HIV/AIDS Housing. We also have Vanessa Larkin and Kate Briddell from OHH in the webinar today with us as well.

For today's webinar, we are going to walk through the notice issued last week that clarifies the rent standard requirements for the HOPWA Program. We know that housing costs have risen exponentially across the country in recent years. We hope that this notice will clarify the options available to grantees in setting local rent standards that will hopefully lead to more client choice and options for the people served by the HOPWA Program.

We are going to share a lot of information with you all today and walk through the notice. We look forward to taking your questions. Please don't hesitate to ask any questions that you all have today, or if you read through the notice after the webinar today, or have more questions, please don't hesitate to submit those through HOPWA@HUD.gov. With that, I will now turn things back over to Steve and Heather.

Steve Ellis: Thank you, Amy. So, as Amy mentioned, today, our goal is we want to help everyone break down and digest the CPE Notice 2210 or the clarification for HOPWA rent standards.

So, here you'll see some of the topics we're going to cover today. As you can see, we are following pretty closely to how the notice itself is outlined.

So, once again, we just want to go through the different sections, and help explain them, and make sure everyone understands what's there. When we get through that, we'll talk a little bit about some of the documentation that would be required depending on some of the options that you might choose.

Then we'll also talk about next steps particularly for you grantees out there listening. What is it that you need to do based upon this notice? We'll go through some question and answers that people have submitted.

So, let's start with talking about the purpose of this rent standard notice. Why was this particular notice issued?

So, the purpose of this notice is to clarify HUDs guidance on applying the rent standard requirements at the regulations you see here while HUD and HOPWA consider potential rulemaking changes to update HOPWA rental assistance requirements.

So, this clarification, the goal is to give grantees flexibility regarding what amounts may be used when establishing a rent standard. So, you should have gotten the email from The HUD Exchange that announced the notice. It has it in it. But also, when we share this slide deck with everyone, you'll see here the hyperlink that will take you to the notice. We will make sure that also ends up in the chat if individuals need to follow along as we go through today's presentation.

So, how did we get here, right? Let's talk a little bit about the background regarding HOPWA rent standards.

So, the short of it, HOPWA regulations require that grantees establish a rent standard. So, we'll come back in just a moment about what a rent standard is and what that means.

But a rent standard is those amounts which include rent and utilities that set the limit for housing costs for unit sizes ranging from efficiencies to six-bedroom units. So, rent standards alone aren't the only requirements when households are looking at utilizing their HOPWA rental assistance.

So, the rest of this will also talk about some of the additional requirements. Although, we won't go into some specifics on those topics today.

So, it does talk about that you have to use your rent standards along with rent reasonableness and resident rent payments requirements to determine the maximum allowable subsidy in a unit. So, just that quick reminder when it comes to rent reasonableness, there was a webinar at the second CARES Act Conference that there was an overview of rent reasonableness.

So, we'll also share that link in the chat in case you need a refresh on rent reasonableness. But you need to make sure unit meets your rent standard and rent reasonableness. Particularly, when you are determining portions of rent, you need to make sure that the household follows the resident rent payment requirements as part of the HOPWA Program which is the maximum, the 30/10 or welfare rent when you go through a rent calculation.

We want to stress that because households cannot pay more than what a HOPWA rent calculation asks them to pay. So, you'll see here throughout the slides, we will make references to Section 8, or HCV programs, or trying to align the programs as closely as possible. So, we want to make sure though that one of the clear differences is that households cannot pay more than that 30/10 or welfare rent.

So, if you do have questions about rent reasonableness or rental calculations for the HOPWA Program, please look up that webinar that I'd mentioned as well as that Wright Curriculum Training that was recently published.

So, let's go back to the rent standard. So, the rent standard shall be established by the grantee and shall be no more than the published Section 8 fair market rent or the HUD approved community wide exception rent for the unit size.

So, this is what HOPWA regulations say, but particularly this particular topic got a little bit confusing, right? Particularly when it comes to community wide exception rent. We'll talk about that in just a moment.

But particularly, we want to stress because a lot of the work for this notice is particularly falling upon the grantee because you will see from HOPWA regulations, it's the grantee—not a project sponsor—that sets the rent standard.

Also, the regulations state—and we'll circle back to this at the end of today's presentation—but also on that unit-by-unit basis, the grantee can increase the

amount of the rent standard by up to 10% for 20% of the assisted units. So, within your program, you've always had a little bit of flexibility to go above your rent standard regardless of what methodology you use and that flexibility still exists.

So, once we keep going through the background, it's a quick history of why HUD and HOPWA needed to release this information. So, the HUD community wide exception rent—which is a phrase from HOPWA regulations when they were issued in 1992—describes something that basically no longer exists. Community wide exception rent applied to the Section 8 program.

Once the Section 8 Program became the HCV Program, that terminology ceased to exist. HOPWA tried to define that in different ways even though the idea itself wasn't there.

So, the whole purpose of this is to help redefine HUD community wide exception rent and allow all of the options that you can use to establish a rent standard. So, while your current rent standard regulatory requirements remain, this notice serves to provide clear and consistent guidance in absence of the term “HUD approved community wide exception rent” in the Section 8 HCV Program.

To help explain some of those options and to go into the new definitions of community wide exception rent, I will throw it over to Heather.

Heather
Rhoda:

Hi, everybody. Thank you for attending today. So, like Steve mentioned, he just started with a background of why we're here today.

So, the notice lays out a few things. First of all, it provides everybody with a reminder about current HOPWA regulatory options when establishing a rent standard and it also clarifies what the phrase “HUD community wide exception rent” means now in the absence of changed Section 8 HCV regulations and the additional flexibilities because of that reinterpretation by HUD. Next slide.

(Long pause)

So, one of the regulatory options that currently exist—and it's still usable—is a grantee can choose to use the fair market rent as their rent standard, okay? So, this is one of the regulatory options. There are two of them.

Just a little bit of background about FMRs. An FMR, they're estimates of the 40th percentile gross rents for standard quality units within a designated area. So, in an EMSA, or in a county, or a group of cities, or a group of towns, or a couple of counties.

FMRs for each unit size—so, meaning efficiencies to six-bedrooms based on the number of bedrooms in the unit—includes a rent amount and the cost of utilities.

So, there's an assumption that that total amount will cover all the housing costs for units of different sizes. The tenant paid utilities though do not include cable, television, or internet.

A couple of important pieces about FMR's—we get this question often and even generally just about when somebody establishes the rent standards. Steve touched on this a little bit regarding rent reasonableness.

So, for example, if your rent standards were set at the FMR, even if the gross rent for a unit—meaning the rent that the landlord is charging plus an applicable utility allowance amount. That added together equals the gross rent. If that amount were to equal exactly your FMR or if it was below the FMR, you still need to complete rent reasonableness.

Rent reasonableness, they go together with rent standards. But it's a completely different process than when you set your rent standards themselves.

So, here we've laid the foundation. You can still use FMR if FMR works for your area as a rent standard. So, that's one option that you still have.

Here is a link where you can find the FMRs. These are published annually right around maybe October I think, or they used to be. But I would definitely make sure to take a look at your local FMRs if that's what you're using. Next slide.

So, oh! Here we have a poll. Since we're talking about FMR, Steve is going to launch a poll. There are going to be two questions and they're specifically about using the FMR as the rent standard.

(Long pause)

So, here we go. “Are your current rent standards set at the FMR? Did you or do you think your only option was to use the FMR?” Say all this time you've been, right? Offering and delivering TVRA rental assistance. Did you think the only thing you could do was the FMR?

(Long pause)

Steve Ellis: We'll give it another moment. It looks like the answers are slowing down. As a quick reminder to everyone—particularly if you have specific questions you'd like answered—please feel free to throw it in the Q&A. We'll try to address anything in chat, but sometimes the chat goes so quickly that we will miss specific questions.

So, if there is anything particular, please throw it into the Q&A. All right.

Heather

Rhoda: So, we're curious. Are your current rent standards set at the FMR?

Steve Ellis: Let's reveal the results.

Heather

Rhoda: "Yes", "no", "not sure"? "Did you or do you think your only option was to use FMR as your rent standard?"

Steve Ellis: So, here you should be able to see the results from today's poll. So--

Heather

Rhoda: So, we have about—oh, go ahead, Steve.

Steve Ellis: I was going to say it looks like almost 75% of those answering said their rent standard is set at FMR which seems like it could be problematic with rising rents. So, this notice will definitely be useful to explain your options, as well as clarifying what options that you do have particularly if you thought FMR was your only option when it came to establishing a rent standard.

Thanks for answering, everyone.

Heather

Rhoda: Yep, great. Thank you.

(Long pause)

Okay. Now we're going to move on to another option. Remember when I first started talking about fair market rent, I was referencing that there were in current HOPWA regulations—as Steve mentioned in the previous slide—were two regulatory options that are available.

One, you can adopt the FMR as your rent standard or you could adopt the HUD community wide exception rent as the rent standard. But because this term isn't used the way it used to be under the HCV program, right?

The notice is now interpreting what the HOPWA HUD community wide exception rent means. In this notice, you'll see that there are two different options about what that means. That's what we're going to talk about next.

Okay. Here we're going to talk about the first option. Both of these options are described on page three of the notice. We put a link to the notice in the chat. So, if you're able to or if you have it handy, you might want to reference that. But you don't need to.

So, HOPWA now interprets the HUD community wide exception rent can mean a couple of things. Note—under Option one, a grantee does not need permission

from its field office to use Option one on page three as the rent standard for their program.

But pay particular attention because there are certain caveats about that. So, what does it mean?

So, a HOPWA grantee could adopt the HCV—Housing Choice Voucher Program—payment standard set by local public housing agencies, Public Housing Authorities—PHAs—even if that amount is set at the basic range or the exception payment standard.

The notice describes that for PHAs, the term “basic range and exception payment standard” means something very specific. So, the basic range that we’re talking about here would mean a PHA who has set their payment standard between 90%-to-110% of the FMR. When a PHA does that—sets their payment standard within a basic range—they don’t need HUD approval to do that.

Another option within Option one, there could be some PHAs in your local area that have exception payment standards. A PHA can set an exception standard below 90% of the FMR or above 110% of the FMR for designated parts of their FMR area. They can do this with HUDs approval.

So, here we’re talking about—in just quick summary—FMR is still an option, right? But we all know that for most places, the FMR is not a viable option to give folks a wide range of choice to secure a unit or you can adopt your payment standard at the HUD approved community wide exception rent without permission from your field office if your local PHAs payment standard is set at the basic range or at the exception payment standard amount.

(Long pause)

Next slide. Don’t worry. We have some examples of some of these options going forward.

To finish up for Option one, we just wanted to clarify because I know there are several PHAs that are required to use small area FMRs as their payment standard and there are some that opt-in to use them. But under Option one, if a local PHA that’s serving in your area is using small area FMR, you’re not able to use that under Option one.

But you could potentially use this under Option two when you’re contacting or you want to make a request, and develop a proposal, and justify that, and submit that to your local field office. So, just note that using small area FMR is covered under Option two.

When a grantee sets their rent standard for their service area based on a PHA payment standard, right? The basic range or the exception payment standard, they're going to be adopting the payment standard of each PHA operating within the grantee area.

So, for instance, in Maine, a grantee that serves the entire state, if they want to under Option one, use the high community wide exception rent at the basic range or the exception payment standard, which could mean adopting up to 24 payment standards, right? So, you would use each of the local PHA payment standards in your service area.

(Long pause)

Feel free to jump in, Steve, anytime you want to add anything.

Steve Ellis: You're doing great so far.

Heather

Rhoda: So, let's talk about an example of Option one. So, HOPWA grantees may set their rent standard for their service area and adopt each of the local PHA payment standard.

So, here we have an example. Fort Landing is a HOPWA grantee and there are four PHAs operating within their service area—Fort Landing without HUD permission. You don't need permission from your field office. You could use all four of the PHA payment standards, right?

If they're set at the basic range or at the exception payment standard. We just wanted to add a quick note and a little caveat here. When you're doing this, though just pay attention to the HCV payment standard amounts because with this option, it's possible that say for instance, two of the PHA payment standards might be set within the basic range and the other two you're using might be set at exception payment standard amounts.

So, just be aware of the amounts of each payment standard schedule that you're using. When you use this option, the rent standard will apply in assisting families residing or seeking to reside in a PHA area regardless of the project sponsor implementing the rental assistance program in that area.

Steve Ellis: So, that would mean particularly for project sponsors, if you fall within a jurisdiction that has multiple PHAs, make sure you're tying your payment standard to where the client's living, not your service area, right?

So, particularly, if you want to use one PHA payment standard, Heather will discuss as part of Option two. But here that means, right? You have to apply

payment standards according to where the client lives, not where you serve or contracted to serve.

Heather
Rhoda:

(Long pause)

So, we have Option one. Okay, Option two. Now remember, this is included on page three of the notice itself.

So, here we're going to be talking about options that do need approval from your local field office. They're still called HUD community wide or HOPWA community wide exception rent, but these are different than what I described in Option one.

So, first of all, I described in this notice HOPWA grantees could propose, and justify, and receive approval as long as all the documentation requirements are met and they're making a good justification.

A rent standard outside of the FMR or the HCV payment standard. Remember, basic range, exception payment standard amount. This option allows for these two different options here.

So, a grantee could establish a rent standard based on documented housing costs and the housing needs of low income people living with HIV in the grantee service area, or even a defined subset of that area, or adopt the HCV payment standard of one of multiple PHAs in the grantee service area to apply as the payment standard for the entire service area, right?

So, this could be particularly helpful if you are a grantee that serves an entire state or if you're a grantee that serves the majority of a state, right? To narrow down the amount of PHA payment standards that you want to adopt. You could propose, and justify, and to submit to HUD, and request being able to use one payment standard. That payment standard—all the amounts, right? From efficiency units to six-bedroom units would apply to your entire service area.

(Long pause)

Next slide. A couple of things to note. Rent standard amounts under Option two, will only be approved in circumstances where grantees are able to document those other allowable options for establishing rent standards do not provide eligible families with reasonable selection of decent, safe and sanitary units.

For Option two only, the information that's described on page three of the notice, grantees should direct their request--we're going to get into that later, the documentation process and the request process—to the community planning CPD, Director of the HUD field office serving the grantee.

Here we have a link with CPD field office contact information if you don't already have that or know that. But I'm sure y'all do know, right? Who your field office is?

Okay. So, we're going to talk about some options under two, okay? Remember on the previous slide, we had two and there's a little a and a b.

Well, the first one, a grantee may establish a rent standard based on documented housing costs and housing needs. Here's an example of what could follow under that one.

So, we're going to use Port Landing again. Port Landing is a HOPWA grantee whose service area is Fun City, EMSA. The grantee could propose—under Option two—and justify and receive HUD approval to use as its rent standard the small area FMR amounts for its entire service area.

So, this is where small area FMRs could be applied. Just note though, small area FMRs, some folks might be completely familiar with this, and some may not. Look at them and read them carefully because small area FMRs are specifically set at the neighborhood level by zip code, right?

So, in certain areas, take even Portland, Maine where I live. There are three or four different zip codes in Portland. So, 04101 in Portland may have a very different set of small area FMR amounts for zero-to-six-bedroom units and over 101, we only cover a certain area within Portland. So, it's that specific.

So, just look at them carefully. On a small area, FMR amounts allow for higher housing costs or higher rent standard amount in higher rent neighborhoods and lower housing costs or lower rent stand amount in lower rent neighborhoods. The intention is to work closely aligned with rents in certain parts of your state, town or city.

Small area FMR amounts can be found using this link provided here on the screen. So, that's an example of Option two. Small area FMR need HUD permission, right? We're going to get into all that information later on in the presentation.

(Long pause)

Okay. We have another example under Option two. A grantee may establish a rent standard based on documented housing costs, right? Housing needs.

Port Landing is a HOPWA grantee whose service area is Fun City EMSA. They don't want to adopt small area FMR, but the grantee does want to propose, and

justify, and hopefully receive HUD approval to use as its rent standard 150% of the FMR for its entire service area.

So, that's also an option under two. It's essentially setting your own payment standard amount using the FMR as a basis in this example and percentage above the FMR—150%, 140%, 145%.

I don't know about you, but this is really exciting. I wish when I was a HOPWA grantee, we had these flexibilities too. I know I haven't been a grantee for quite some time. I really feel like these options and the flexibilities described in this notice will definitely help grantees and more importantly, help people that are looking for units.

I know there are situations where people have been awarded HOPWA tenant-based rental assistance. They're looking, and looking, and looking for units and they can't find anything. There's only so much time, right?

Somebody can keep looking and then you want to award it to somebody else. So, I think there's some real opportunity here for folks and for your HOPWA programs.

(Long pause)

Okay. Now we're going to finish off. I'm getting ahead of myself here, sorry. We're going to finish off under Option two. Remember, Option two, this you do need field office permission.

So, the other one under Option two was adopt the HCV payment standard basic range or exception rent of one of multiple PHAs, okay? So, say an example, Port Landing. Port Landing's very busy. Port Landing does a lot. I use Port Landing every presentation as the grantee as an example.

So, their service area is Fun City EMSA. In this EMSA, there are four PHAs operating HCV programs. Port Landing may propose, justify and submit to HUD to get approval from their field office to just simply use one PHA payment standard for its entire service area instead of four.

So, this could be particularly useful for a state for either a grantee that's serving an entire state or a grantee that's serving a broad area that has multiple PHAs located in those areas. How's everybody doing?

Steve Ellis: We've gotten some great questions, some great feedback. Some people even echoed that they were excited, Heather, when you said that—

Heather

Rhoda: Oh good!

Steve Ellis: --you were excited. I want to echo it also. I think this is a very exciting opportunity for everyone. Particularly as Heather was saying, as someone who does TA, we've heard for a long time about people unable to find units. Grantees and project sponsors unable to find units. This is really opening the door to have some flexibilities to find the right rent standard for your budget and your community needs to make sure individuals get and stay housed.

Heather
Rhoda: Great.

Steve Ellis: So, before we go through some of the additional and important information that's included in the notice, we will address some of the questions that have been thrown into the chat and Q&A at the end. But basically, a lot of people have been asking about specific examples of, "Can you use it?"

I said we will go through those. But once again, as Heather was going through those slides, keep in mind the answer is yes or probably as long as you follow what option it is, right?

Some of those options do not require field office approval. Some of the options do and if you do need field office approval there's some additional documentation that will go along with it.

So, I really like reading through the chat and seeing how creative people are being particularly when people are throwing in examples of how they're addressing client's needs. I want to say that's what's exciting for me is a lot of you listening. You're really already thinking this through about how to help per se.

So, as we get to the end, we'll talk about when you've decided on what you want to do, what those next steps are. We got a "Woo hoo! This is exciting---"

Heather
Rhoda: Right. I've got to admit I'm loving—

Steve Ellis: --in the chat.

Heather
Rhoda: --the questions and the comments.

Steve Ellis: Yeah.

Heather
Rhoda: Some of the questions and comments, you'll see that we'll be getting to some of the points later on in the presentation because I'm looking at some of the

questions and such. They'll be addressed. If not, office hours. That'll be here before you know it.

Steve Ellis: So, let's talk about some of that important information included in the notice. So, the notice provides additional HUD approval for the use of the PHA payment standard or exception rate as the HUD approved community wide exception rent, right?

So, once again, helping to define this idea when a HOPWA grantee has determined and documented that FMR is not adequate. So, particularly when it comes to Option two.

So, if a PHA is using FMR as its payment standard—as we are aware that there are many that still choose to do that—grantees that wish to use a rent standard amount higher than the FMR, you must use Option two and apply to the field office for approval or exception, right?

So, for you communities listening, that in TA we've always said your options are the FMR or the community wide exception rent. You say that your housing authority's payment standard is FMR.

So, if your options are FMR and FMR, you will need to go through that Option two and submit the documentation request to the field office to use something different. Once again, we'll walk through that. But even those options for communities that have felt stuck, you have some flexibility and path forward to choose something different to help your HOPWA clients.

So, due to prior lack of clear and consistent guidance regarding the meaning of HUD approved community wide exception rent, HUD and HOPWA is also not going to make any findings and discourages auditors from making any findings against grantees on or behalf the date of this notice or during the 120 days following this notice, right?

So, it's well aware, right? That this is confusing, right? What terminology do you use particularly because different HOPWA resources slightly define community wide exception differently?

So, just to make you all aware, right? That HUD will not be making findings on this topic.

If your auditors have any questions, this would definitely be that place that you would want to keep this notice either printed out or put it in your grant file or if you use electronic grant files, save it and put it there, so your auditors are aware of HUDs instruction when it comes to this particular topic.

However, right? This spot that's there, over the next 120 days following the publication of this notice, HUD and HOPWA do expect the grantees to update policies for determining their rent standards and be able to support any rent standard amounts above FMR as provided by this notice.

So, what that means is particularly grantees—and we'll go over next steps—but grantees if you are going to change your rent standard, HOPWA does expect you'll do that in the next 120 days. Make sure that all of the documentation—including updating your policies, and procedures, and everything else outlined in this notice—is done within that 120-day window.

So, some additional topics that are part of the notice that we just wanted to circle back on, make sure everyone's aware particularly some of the things that still apply even though there's this exciting update for the definition of "community wide exception rent" and your options for your rent standard.

So, does the unit-by-unit rent standard increase—also known as the 1020 rule—still apply? So, yes, it does, right?

So, even grantees as you update your rent standard to whatever methodology you choose to use, that 1020 rule still applies. So, you're still able to increase your rent standard on a unit-by-unit basis by 10% for up to 20% of your assisted units in your portfolio.

That does not change because of this option, and it does not change regardless of the method you use to create your rent standard.

Heather

Rhoda: Right.

Steve Ellis: But we do want to stress ultimately, it is the grantee's responsibility for how they split up this 20% across their service area, right? Different grantees will do it different ways.

So, project sponsors listening, if you're not sure or your grantee hasn't established a way, please reach out to them because ultimately, it's the grantee's responsibility to make sure that the 20% of your entire service area, right?

So, they need to be the one ultimately tracking that regardless of the methodology for approving the 10% overage.

Heather

Rhoda: So, just a quick recap. Under Office, you go to page three of the notice. Under Option One, if you were to pick Option one, right? Say you're staying with FMR—1020 rule still applies.

You're adopting the local PHA payment standard that's set within the basic range or an exception rent, right? This 1020 rule applies.

You're picking something and take it a little bit further. You are opting instead to do something under Option two, right? Remember when we gave those examples of one of the options was a grantee could establish a payment standard at 150%.

With the permission, justifying, proposing from the field office. On a case-by-case basis, whatever your methodology is—whatever you've established as your rent standard—this rule still applies.

Steve Ellis: So, there were a lot of questions or things I've seen in the chat where someone will say, "Our rent standard's \$1,000 and a client found an apartment that was \$1,025." This is particularly those situations that project sponsors reach out to the grantee—

Heather Rhoda: Right.

Steve Ellis: --because maybe you don't need to totally reestablish your rent standard. Maybe you just need to look at this unit-by-unit increase—or the 1020 rule—as a way to make sure you're meeting the needs of clients.

So, let's start talking about documentation particularly for grantees. Grantees take note. You've got some homework to do, right?

So, as part of this notice, grantees must document the rent standards in your program, policies, and procedures, right? This is something that it has always been stressed that it should be a part of your policies and procedures. But particularly, making sure that you are updating them once you update your rent standard.

Most importantly, you need to make sure that those policies and procedures are available for HUD review to make sure that they understand and can line up the methodology you use to establish your rent standard, right?

So, this doesn't mean that you need to submit your policies and procedures to your field office regardless of the methodology you use. But you do need to have them available.

So, once you know what your rent standard is or you seek approval from your field office and get it, immediately update your policies and procedures. That way you are aware. The field office is aware. OHH is aware. Project sponsors are aware. Clients are aware, right?

So, that's a really important piece in all of this. You do eventually need to identify your rent standard amounts in your project sponsor agreements or contracts when it comes time.

As you all can see, given some of the options that are put out there, grantees must also pay special attention to monitor the project sponsors to ensure compliance with the rent standard amounts for the assisted units throughout its service area, right?

So, you're going to open the door potentially to a new rent standard. So, as you start monitoring project sponsors whether it's remote, right? Whether it's sort of a desk audit or it's a monthly audit—whatever that is—grantees, really pay attention to make sure your project sponsors are adequately and correctly implementing whatever new flexibilities you are utilizing as your rent standard.

This last bullet point about maintaining documentation for supporting your grantees determination that the use of FMR does not provide families a reasonable selection of decent, safe, and sanitary units, right?

So, this will definitely be something we'll talk about as part of documentation. But just keep in mind, right? Particularly if you need to seek field office approval, just make sure that you are keeping—whether in a paper file or an electronic file—all of the information that you've submitted to your field office as well as any approval that you get back.

I think one thing that we noticed as part of the CARES Act in some of the waivers is there was a lot of position change, right? Turnover in agencies or grantees.

And so, when it came time to document that certain waivers were requested and approved, it was tough to find those emails. So, this is definitely that place that right away start saving this. So, if there is a change in position or responsibility, that particular HOPWA program has all the documentation it needs for now, or future monitoring, or request from HUD.

So, adjusting the rent standards overall and when do they need to be readdressed or reviewed? So, do they?

Yes, obviously, they do. But when adjustments are effective for currently assisted households is not defined in this notice. So, this is a little different than some of the previous webinars regarding establishing rent standards.

So, as a quick background, right? So, when we're talking about rent standards, we're talking about HOPWA rental assistance because we're talking about regulatory requirements, not any local imposed caps on things like STRMU or PHP. I think about TBRA, facility-based housing, those things.

Heather

Rhoda: Master leasing.

Steve Ellis: Master leasing. So, you set that rent standard and then every so often you need to review or readdress that rent standard.

So, particularly as part of this notice, grantees should reassess the rent standard amounts annually and adjust to correspond to the HUDs annual updates to FMRs.

So, particularly just looking at this around every October, right? Particularly as FMRs come out is a good time to look at your rent standard and make sure it's still meeting the needs, that you don't have too high of rent standards, you don't have too low of rent standards.

So, particularly if you are going to change your rent standard or if your rent standard is somehow tied to FMR, whether it's MFR, small area fair market rent, your Housing Authority payment standard—because that is most likely tied to FMR in some way, shape or form—you will need to adjust your rent standard for the 90 days following the release of the FMRs.

So, start to keep in mind that come every fall there's going to be additional requirement to review. Doesn't mean you need to change it. Doesn't mean these options will go away. But you do—as the grantee—need to step back and look at this annually just to make sure you are doing the best for your clients and your budgets.

As for when to implement new rent standards especially for families who are currently utilizing HOPWA assistance, grantees should have written policies and procedures detailing when these will take effect.

So, we won't go into a lot of detail on that today because particularly, you all I am sure are already busy, right? Thinking through what you need to do for rent standard, punching some numbers, looking at budgets.

So, soon we'll come back to this idea of having to readjust your rent standard, and when any changes will take effect, and how to implement that. But we do just want to take note to sort of put all of this together into the bigger puzzle and make sure it all fits within your normal operating year.

Heather

Rhoda: But there isn't a requirement to make adjustments in a year or in two years to people who are currently leased up. The notice does not describe that. It's up to the grantees to come up with a policy about how that will be handled which is a little different than past presentations about creating rent standards. But we're going to go into further detail about that during the office hours in August.

Steve Ellis: So, if we haven't talked about rent reasonableness enough, let's talk about it at least one more time. I'm sure it's going to come up a little bit in the questions and answers, right?

So, does rent reasonableness still apply? Yes. It absolutely does, right? Probably for the 15th time in this webinar, we keep talking about regulation state. You have to create a rent standard and it needs to meet rent reasonableness.

So, regardless of what your rent standard is, you need to make sure each individual unit meets the rent standard. So, that rent standard sets the limit for housing costs which includes the rent plus utilities of units for different sizes once again ranging from efficiency units to six-bedroom units, right?

So, conducting rent reasonableness is a method to determine if that gross rent—the unit rent plus utilities for a proposed unit—is reasonable compared to unassisted units in the private market.

So, particularly, if you are a grantee or a project sponsor that you have a lot of questions about rent reasonableness, right? Or maybe you're unsure if you're doing rent reasonableness correctly, you will definitely want to look at this refresher because sometimes we've seen issues when people will go down the wrong path and start to do rent reasonableness for assisted units.

Say they're pulling units from their TVRA current utilization, right? You can't compare against currently assisted units. So, there's different methodologies that you can do to do rent reasonableness. There's different systems out there to help you.

But just to circle back, right? You still need to always make sure the unit meets rent reasonableness.

(Long pause)

All right let's talk about some of the considerations that grantees should use when establishing a rent standard.

Heather
Rhoda:

So, if you're wondering what amounts should you use, right? Should you stick with the regulatory options that have kind of always been there or do you want to take advantage of some of the flexibilities detailed in the notice?

So, let's take a look at and talk about some things you might want to consider. So, as we've been talking about sort of like we've been saying "rent reasonableness" over and over again, and "rent standards" over and over again, HOPWA grantees using funding for rental assistance must have a rent standard that sets the limit for housing costs for each unit size from an efficiency to six-bedroom units.

You need to strive for balance, right? Between efficient use of HOPWA rental assistance dollars and increasing affordable housing options for low-income people living with HIV and their families.

Rent standard amounts—if they're set too low—limit finding acceptable units or limit where somebody can live specifically like in a neighborhood that's close to medical care, transportation, employment, schools or other resources. Amounts that are too low could also unintentionally concentrate the housing options or choice to higher poverty areas. Rent standard amounts that are too high could limit the number of families that pop up grantees are able to serve, but also afford families with greater choice and greater opportunity to expand options where they can live and live closer to medical care, live closer to transportation, live closer to grocery stores instead of convenient stores, live closer to employment, schools and other resources. So, it's absolutely a balance.

(Long pause)

So, a few things we thought we would just mention. When you're thinking about what factors or things you should be thinking about as part of your planning for establishing your program rent standards.

So, you might want to think about the location and condition of units in your service area. Are units in generally good condition and meet inspection requirements or the opposite? Are they not in good condition or don't meet inspection requirements?

Condition of units will definitely drive how fast or how quickly units can be leased up and continue to be assisted with proper rental assistance. The number of units currently receiving HOPWA rental assistance, you definitely need to have an idea of what your budget could support going forward, right?

So, the folks that are currently receiving rental assistance right now have a rent amount that's already been agreed on with the landlord and that your current rent standards met rent reasonableness. So, changing your rent standards may not necessarily affect the people that you're serving right now, but it could affect the people you're serving when you get landlord requests for rent increases, right?

When a landlord submits a request for a rent increase before you're going to be approving that at all, you want to know if it's going to meet your current rent standard—whatever you're setting it at, the options described in this notice—and does it meet rent reasonableness, and can your budget support that increased housing assistance payment cost—that half-cost going forward.

So, it's something you're definitely going to have to forecast and budget for. In addition, if you're using any of these options here, how many people do you

intend to serve based on estimated need, based on information you put in your application—say competitive application to HUD if you're a competitive grantee—and based on your waiting list because you'll want to know.

You'll want to have an idea of what your rent standards amount are. In addition, how many people you think you could lease up at that new rent standard amount and then how that would affect your cost.

Anything to add, Steve?

Steve Ellis: No. No, great.

Heather

Rhoda: Next slide. So, more factors. So, take a look at your current and future HOPWA allocations or awards. What is your current budget right now for rental assistance?

Remember when you're thinking about and looking at TBRA budget, facility-based housing, or master leasing, it's all your costs. All your costs play into this. It's not just the housing assistance payments cost. The amounts that you're paying to landlords, right? On behalf of the HOPWA assisted household.

If you're using HOPWA funding to pay for staff time—right? —and cost to deliver TBRA, facility based housing or master leasing? If you're using HOPWA funding to pay for that, those costs get charged to let's take TBRA, for example. Those costs get charged to the TBRA line also.

So, if you're forecasting amounts and considering increasing your rent standards, make sure you're considering all your costs, not just the housing assistance payments. Let me see.

Also, if you've been managing or delivering a rental assistance program—say TBRA again, for example—you probably have a rough idea of the number of landlord requested rent increases that come in, right?

Do you get a handful every year whether they have a lease, and their lease expires, and they renew, or they had a lease for a year and they didn't renew a written lease, but they're going to month-to-month? Landlord rent increases are usually on an annual cycle.

So, have a rough idea about requested increase because that will also affect your budget too. Also, your attrition rate. How many people are leaving the program, right? Each year or each month because that will give you an estimate of where you have a window and your budgeting when you're setting rent standards or just budgeting day-to-day.

So, forecasting just generally expenditures is critical. Make sure to regularly review your actual cost against forecast and expenditures.

So, consider these things and local need when you're trying to figure out what you want for your rent standards.

Steve Ellis: Absolutely, because particularly this stressed idea of overhead costs if charged to HOPWA, right? That this is definitely very exciting option.

Heather
Rhoda:

Yes.

Steve Ellis: So, make sure you're incorporating all costs as you plan your budget and forecast. Don't accidentally just increase your rent standard and you can't afford the staff to delivery tenant-based rental assistance.

Heather
Rhoda:

So, here we're going to talk about some of the rent requests and documentation requirements for Option two. We're hopefully going to have some more information about this too during the office hours and maybe even an associated form or tool that grantees can use optionally—it's not required—can use when they're submitting a request in documentation to their local field office.

So, here we're going to touch on some documentation requirements. I said that like five times, right?

Documentation—so, when a grantee proposes using Option two, the grantee must submit—along with its request to their field office—the following information and documentation. Of course, the grantee information, right?

The name of the grantee, the HOPWA grant numbers for the active grants for which the rent standard would apply assuming they would apply to all your grants. But make sure you submit information on the grant numbers, your defined service area, right? For which the rent standards apply. Grantee contact name, the person at the grantee who submitted the request to HUD and the grantee contact email.

Steve Ellis: Before I move on to the next slide, I just want to highlight to participants listening that the next slide will talk about some of the options for community wide exception rent that require field office approval. So, what I have been reading through chat, this is definitely one of those places that people have said that “If we want to do—” fill in the blank “—what do we need to do?”

So, this is definitely that place to watch to see if you choose an option—

Heather

Rhoda: Yeah.

Steve Ellis: --what it is that your grantee needs to submit.

Heather

Rhoda: Right. So, here in the presentation, we described three options, right? For pop-up community wide exception rent. But just because it's not listed like in one and two, it might end up falling under number three, okay?

So, don't think it's not an option Definitely discuss that with your local field office.

So, we talked about adopting the HCV payment standard within the basic range or exception rent of one of multiple PHAs in your service area, adopting small area FMR, or a grantee-defined rent standard based on documented community housing costs. So, those are the three things that we talked about.

So, let's just touch on the first one—the HCV payment standard of one of multiple PHAs. So, when you're submitting your request to your field office, make sure you have all that grantee information, and be sure to include, and document in the request the name of the PHA whose payment standard you're going to be using, and attached documentation of the payment standard, right?

So, for example, documentation should include information about whether the PHAs payment standards are set within the basic range or set using exception payment standard amounts. We'll get into more detail about this in the office hours, right, Steve?

That's a punt. That's called the TA punt.

Okay. So, small area FMR. Going on to number two. So, along with the grantee information, be sure to include the following—list of the metropolitan areas within your service area or an attachment of it, right? You can find that information on the HUD website—HUD Exchange.

List of the zip codes where the small area FMR will be used in your service area. Maybe you're not going to use it for the whole service area. Maybe you're going to use it for a subset.

Certain zip codes, right? Rents in that area beg using small area FMR amounts because it will open up an area and they're more aligned with actual housing costs. So, that's a kind of a way to use the subset.

So, you could find a list of the zip codes. You could find it right on the HUD website. There's a link that shows all the zip code amounts.

If it so happens that HUD does not publish small area FMR for all zip codes in the grantee service area, include a description of a plan to establish rent standard for that uncovered area. What are you going to do, right?

Assuming you're going to use small area FMR for your whole service area and you have four, five, six zip codes that don't have a small area FMR amount, just include as a plan what you're going to do to make sure you're also covering that area. So, you're going to want to identify the area as a portion where there isn't a small area FMR amount, describe the methodology that you use to determine a rent standard for that area.

This could include options such as defaulting to FMR or using a local PHA payment standard, basic range or exception rent. You also want to include defined rent standard amounts for different unit sizes from efficiency through six-bedroom units for the uncovered area.

You'll notice when you're looking at small area FMR rent, you'll have a list of zip codes. You'll have the efficiency units. Not all amounts will be the same. Some amounts will be lower, and some amounts will be higher.

But in certain zip codes, you might see that for an efficiency, it's all \$800 in certain zip codes. In other zip codes, it's \$2,000 in certain zip codes. So, just make sure you're paying attention to those amounts.

So, for the grantee-defined rent standard, be sure to include information and documentation in your request to include information and description of the type of community-wide exception rent proposed. Example of approvable methods could include—these are examples—defined percentage range, right? Like we talked about earlier above or below the local PHA payment standard. Define percentage rates above or below FMR. You could use a previously HUD issued FMR or another example that would fit under grantee defined rent standard.

In addition, supporting documentation should clearly define and justify the community-wide exception rent standard being proposed to include submitting the following reason for choosing the grantee-defined community wide exception rent. Methodology you use to determine that, documentation of actual housing costs in the defined service area for each of those unit sizes, source documents for units that are currently available, documentation of housing needs for clients in the service area, and then rent standard limits for efficiency to six-bedroom unit, and how utilities are incorporated into the proposed rent standard amount—how you accounted for that.

Remember, all rent standards—regardless of how you set them—the methodology you use? That amount includes rent plus the cost of tenant paid utilities, but not including cable, television or internet.

Steve Ellis: We're almost there, everyone. This is a lot particularly for a Wednesday. So, we thank you all for sticking with us. We're almost through and we'll get to the Q&A.

So, as we wrap up today's slides, let's talk about next steps particularly for grantees. So, once again, grantees, you have some homework. But grantees, keep in mind that you're going to be able to share this homework with your project sponsors, as well as those getting the assistance.

So, here are your next steps, right? Review the notice carefully. Take time. Read it. Write on it, right?

I think when the notice came out, I probably read it five or six times through just to make sure I got the gist of the idea before I really started digging in. That way, if you review this carefully and keep rereading it, you have a good idea of what your options are before you go into these next steps.

So, as Heather said—and we want to stress again—please review your rental assistance budgets, right? Both your housing assistance payment costs, your utility costs, as well as any relevant overhead costs to see what space or room you have for any flexibility or changes.

Make sure you're aware of the current number of households receiving assistance and any applicable wait lists, right? So, you want to find that balance between your current needs, future needs, and how people can find units.

Review and assess the community need to ensure that rent standards are set to afford a range of housing options within different neighborhoods within your service area. One reason I'm so excited for this notice--particularly this bullet point here, right? This different neighborhood within your service area.

This is such a great way for communities that are looking at equity and HOPWA equity to really start bringing an equitable lens to your program. So, even if you're starting with your rent standards for your rental assistance, if you have the budget, if you have the capability and flexibility to do so, we are aware in many communities, voucher holders are kept to certain neighborhoods because rents are so high, and those neighborhoods may not always have the best amenities. They may not have the best options around.

So, this is that way to break through that and allow persons with HIV and their families to move to neighborhoods, to have better amenities, to have better things around that are closer to items and resources that they need.

So, this is such a great way to bring an equity lens to your programs. With that in mind, grantees, please involve not only your project sponsors as part of this process, but also persons with lived expertise, right?

The people with HIV in your community that are getting HOPWA assistance, they are the real experts on your program because they are the ones who are living within this program. They are the ones that the rules and policies effect.

So, please use them and their feedback when you're thinking about your rent standard and how you want to increase it if you have the money to do so. Apply this to all of that, right? All of your HOPWA assistance particularly if you have multiple budget line items and activities.

Also, review your service area housing stock or current portfolio of housing options, right? So, you can see where some units are that might be nicer, that might be more livable, right? That might do better for habitability or inspection.

My guess is this is also going to be that place that you're going to want to involve your project sponsors and persons with lived expertise, right? As well, as just what you generally know from living and working in your community.

So, bring all of these things into play as part of your next steps when you're figuring out what's next. While we're going to answer some questions and we're going to have the office hours, push comes to shove, if you have questions about the content of this notice, please send an email to HOPWA@HUD.gov and the fine folks at the HUD Office of HIV Housing are more than happy to help address any questions that come up as part of this process.

(Long pause)

All right, question and answer time. So, there is some common questions have come up as part of our Q&A. We will definitely begin to address some of those. We've been answering some of them in chat, some of them in Q&A, asking people to put them in Q&A.

So, we just wanted to answer some of them out loud to make sure everyone's aware. The first to stress again, is to make sure that everyone knows that this webinar, these slides, the recording and transcript all will be available for review as soon as possible and will be posted to the HUD Exchange as soon as we can. A notice will go out on the HUD Exchange.

So, you'll have all of these materials as soon as possible. We'll also email the slide deck out as soon as we can, so people can begin to review them.

So, I think one of the questions that's come up quite a bit is understanding which rent standard options do require a field office approval and which ones do not require a field office approval or process. Heather, OHH? Is that a question you want to address?

Heather

Rhoda: I can or Amy? Go for it.

Amy Palilonis: I was writing an answer in the chat. Can you repeat that question?

Steve Ellis: Yeah! So, a lot of the questions are basically coming down to what options do not require submitting to the field office for approval and which ones do require submitting to the field office for approval.

Amy Palilonis: Sure. So, if you are a grantee and you want to utilize just the straight fair market rent, that does not require HUD approval. You can set your grant standard as the FMR.

Similarly, if you want to adopt the housing choice voucher payment standard set by the local PHAs in your service area—that is if the PHAs are setting their standard either at the basic range or the exception payment standard, you can do that without HUD approval.

So, basically that is adopting the PHA payment standards of all the PHAs in your service area if they are set either at the basic range or they have an exception payment standard.

For small area FMR, if the PHAs in your service area are utilizing the small area FMR, you can't just go ahead and use those. That does require a request to your HUD field office in order to utilize small area FMR as your rent standard and basically the second option for setting the community wide exception rent requires grantees to request HUD approval.

So, that option allows a rent standard based on the documented housing costs and the housing needs of low-income people living with HIV in the grantees service area. So, a grantee can justify and propose a rent standard that way or if you want to adopt the HCV payment standard in the basic range or exception payment standard of one of the PHAs in your service area, but you want to use that throughout your service area, that would also involve a request to the HUD field office for approval.

I can summarize that if that was not coherent. There's a lot of chats and messages popping up. I don't feel like I got them all. I got it a little bit—

Steve Ellis: So, is it correct—

Amy Palilonis: --off track.

Steve Ellis: That's all right. So, is it correct then to summarize to say if you're going to use the fair market rent or the HPV payment standard, that's between the basic range or exception? As defined in the notice, it does not require a field office approval.

Amy Palilonis: Yeah.

Steve Ellis: Everything else will most likely require field office approval.

Amy Powell-Lonis: Yes.

Steve Ellis: If you're not sure, either submit for field office approval or send a question at HOPWA@HUD.gov to be sure.

Amy Palilonis: Sure. That was a very to the point thing answer and I just rambled.

Steve Ellis: No.

Amy Palilonis: Yes.

Steve Ellis: No, I like your specific examples, right? But then, right? So, if you're listening and heard your specific example listed by Amy, you're well aware you're going to need to submit something. We'll send the slide deck that talks about what you need to submit.

But once again, if you're just using FMR or the payment standard between the basic range or exception, right? There's no field office approval requested or needed.

Amy touched on this. I'm not going to ask the question, but just to point it out again, right? That this is the request if needed comes from the grantee, right?

So, we keep stressing grantee. So, there's been a few questions about, right? "Do we submit? We have an administrative agent." It needs to come from the grantee, so those that are in direct contract with HUD. That's where it needs to come from.

Here is a question for OHH, right? When it comes to actually submitting this, right? Is it email sufficient, right? To send this along to the field office. Does it need to be a packet? Do they need to track down a carrier pigeon that will fly it over to their local field office, right? What does this submission look like? What's that process?

Amy Palilonis: Sure! So, it is an email submission process to your local CPD field office just including all of the information specified in the notice as well as the documentation examples that were covered in this presentation.

Steve Ellis: So, for someone like me who likes to build everything into a calendar for today, tomorrow and the next five years, do they need to seek approval from the field office each and every year for their rent standard?

Amy Palilonis: No, approval is not needed every single year if nothing is changing with your rent standard. But we do strongly encourage everyone to revisit their rent standards every year for appropriateness to make sure that they are still meeting client needs. If you do wish to make changes to your rent standard at that point, to absolutely request approval to update your rent standard.

Steve Ellis: Something for all of you listening just to store in the back of your mind. You have plenty of work to do in between now and 120 days. So, this will also be circled back in the future. But at least for some of you that have been asking about, right? "Is this something that we're going to have to do every year? Will it go away?" Pretty much once you seek approval unless you're going to change your methodology, you are all set.

Amy Palilonis: I guess I'll clarify. If you're using the FMR as your rent standard, then you'll need to update it every year with the FMR or if you're using your local PHA payment standards, you would need to update that every year as those are updated.

But if you request and receive approval for a HUD community wide exception wide, depending on the nature of the request you might not need to update that every single year.

Steve Ellis: So, this has come up a few times, but I think I just want to stress the question one more time. So, some of the people have typed that they have several PHAs in their service area. Can they adopt one PHA payment standard for their entire HOPWA service area? If so, what do they need to do?

Amy Palilonis They may adopt one PHA's payment centered for their entire service area?

Steve Ellis: Correct, even if there are multiple PHAs within that service area.

Amy Palilonis: Correct, yeah. So, in order to do that, you would need to submit that request with justification to your HUD field office to get approval to use the PHA payment standard of one PHA throughout your service area that encompasses multiple PHAs.

If you only have one PHA HUD standard, if you only have one PHA in your service area and you want to use their web standard, you could do that without HUD approval as long as it's in the basic range or an exception payment standard. But if you have multiple PHAs in your service area and you want to use the standard of just one of those, then you do need to request and receive HUD approval for that.

Heather

Rhoda: That's under Option two. So, look on page three under of the notice and it'll be described under that.

Amy Palilonis: Yes.

Steve Ellis: So, how about programs that want to use rent reasonableness as a payment standard?

Amy Palilonis: (Long pause)

So, just—

(Echo)

Oh, sorry. So, the question would be proposing to just have rent reasonableness be your payment standard?

Steve Ellis: Correct. To not have a rent standard and just do rent reasonableness.

Amy Palilonis: Right. So no, that is not allowable. So, rent reasonableness should always be a consideration when you're developing these rent standards. Obviously, there are rent reasonableness requirements for the individual units that clients are leasing up.

But a rent standard must be in place. The grantee can't just utilize rent reasonableness as a rent standard meaning they couldn't just have clients rent any unit as long as it is—

Steve Ellis: Right.

Amy Palilonis: --reasonable. There still needs to be a rent standard in place. As was covered on the slides, if you're requesting approval for a community-wide exception rent, you'll need to actually provide that rent standard—what the housing costs, limits. The housing and utilities cost limits will be for each size unit and there would be no way of doing that if your rent standard was just rent reasonableness.

Heather

Rhoda: Right.

Steve Ellis: So, I want to be mindful of time. We have just a few minutes left. Thank you everyone for your questions. With these few minutes, if there's any additional questions, please once again throw them into chat, throw them in the Q&A.

As I'm reviewing it, I've already got the whole office hours mapped out in my head. So, the more you can do to make me change that, the better. So, please continue to throw those things in because it's really great to see you all trying to propose, wrestle with these ideas and operationalize them on the ground. So, we'd love to focus on the office hours on the operationalizing that's for your programs.

So, with the last slides, we just want to remind people of the upcoming webinars and office hours because the HOPWA office—the Office of HIV Housing—is very busy, right? There's a lot coming up.

Time to be determined, but you can plan on the HOPWA rent standards office hours for August 4th. There will also be a to be determined office hours for the expedited waiver. Remember there was a webinar on that just the other week.

So, there'll be an office hours to think through that and help operationalize that. There will be an upcoming office hours on how to manage your budget and balances particularly if you saw an increase.

As you all have heard before, there will be a new HOPWA reporting tool for APR and CAPERs. That will be coming out in August. There will be a whole webinar series particularly for those of you working on the ground and for grantees that need help developing policies and procedures about how to be low barrier, right?

There was a lot of questions that we saw come up today that will be great as part of this, right? How do you be a low barrier HOPWA program. So, you're addressing the needs of your community according to the HOPWA regulations, and the OHH guidance, and not necessarily undo barriers.

If there's anything else that comes up, you have some wonderful TA firms out there. Many of you are in contact with them. So, if you have questions about anything HOPWA related, please reach out.

If you need technical assistance, this slide includes how you request that and there's always the HOPWA Ask a Question desk, right? So, many of you use this now. Please continue to use it.

For those of you that aren't aware, the "Ask a Question" is how you can submit a HOPWA question and get an answer for your question through a formal process. That's also here on this slide for all things HOPWA.

As we close out, Office of HIV Housing, do you have any closing remarks that you'd like to add?

Amy Palilonis: I would just say thank you all for being so engaged and for asking so many questions. The Q&A box was really busy every second.

But I really appreciate you all and all of the hard work you do. Obviously, this is complicated stuff. But we are trying to make it as easy as we can on all of you and obviously as easy as we can on our HOPWA program clients being able to find and maintain their units. We really appreciate all that you do.

More information is forthcoming on that office hours.

Heather

Rhoda: Yeah.

Steve Ellis: Yeah.

Amy Palilonis: Again, don't hesitate to ask questions whenever you have them.

Steve Ellis: Right.

Heather

Rhoda: The questions are amazing.

Amy Palilonis: Yeah.

Heather

Rhoda: I'm just so excited to see. It was just questions, questions, questions. So, they're great. So, that'll help really drive and focus the office hours, so yeah.

Thank you again for your participation.

Steve Ellis: I'll—

Heather

Rhoda: It makes it fun for us too.

Steve Ellis: Absolutely. For Cloudburst, we want to just echo what OHH said. We want to thank you all for all the hard work that you've done in your communities now and over the past two years, even before the two years. It's been a long haul for a lot of you.

I know a lot of you have been talking about the need for flexibility for maximum rent for a long period of time. Here it is everyone. I know it seems like it's a lot, but there's help out there. But keep in mind, this is all for your clients, right?

The reason that you all come to work every day—whether that's remote or in-person. So, we thank you for doing that and we thank you for carving out and a half of your very busy lives and schedules to spend with us today.

So, we'll send out the slide deck. Everything will end up online on the HUD Exchange as soon as possible. Thank you all again. Take care everyone.

Heather

Rhoda: Bye, everybody. Thank you.

Steve Ellis: Bye.

Amy Palilonis: Thank you.

[End of Webinar]