

**COVID-19 Office Hours: Chat and Q&A**  
**June 25<sup>th</sup>, 2021**

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June 25, 2021 2:30 PM from Norm Suchar to everyone: Hello Everyone!

June 25, 2021 2:30 PM from Kayla Thompson to everyone: To join the webinar via the phone, please call in using:

+1-415-655-0002 Access code: 185 207 6880

(If you need to call in toll-free, call 1-855-797-9485)

June 25, 2021 2:31 PM from Greer Hannan to everyone: Please update us on the prospect of renewing the waivers that are expiring June 30. Thanks!

June 25, 2021 2:33 PM from Kayla Thompson to everyone: To fill out the poll, please follow this link: <https://www.menti.com/ex8xnpufs3>

June 25, 2021 2:34 PM from Tara Carruth to everyone: Good Morning, We are unable to select all that apply in the poll.

June 25, 2021 2:34 PM from Latesha Balam-Totten to everyone: CDC's COVID Data Tracker by County

<https://covid.cdc.gov/covid-data-tracker/#county-view>

June 25, 2021 2:35 PM from Latesha Balam-Totten to everyone: CDC's COVID Variant Classifications and Definitions

<https://www.cdc.gov/coronavirus/2019-ncov/variants/variant-info.html>

June 25, 2021 2:35 PM from Latesha Balam-Totten to everyone: CDC's COVID Data Tracker by Variant

<https://covid.cdc.gov/covid-data-tracker/#variant-proportions>

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June 25, 2021 2:36 PM from Lesa Weikel to everyone: For ESG/ESG CV/CoC RRH - If a landlord requires that the tenant pay a mailbox key fee at move in, would this be an allowable fee if the landlord charges the fee to every lease?

June 25, 2021 2:36 PM from Sharon Price Singer to everyone:  
<https://www.cdc.gov/media/releases/2021/s0624-eviction-moratorium.html>

June 25, 2021 2:38 PM from Shonda Gray to everyone: Is income-based rent considered a housing subsidy?

June 25, 2021 2:39 PM from Trew Crocker to all panelists: from Vernet Sherrill to all attendees: 2:39 PM

Can you please put the ERAP kit link in the chat?

June 25, 2021 2:39 PM from Latesha Balam-Totten to everyone: ERAP Media Toolkit  
<https://www.dhs.pa.gov/ERAP/Pages/ERAP-Media-Kit.aspx>

June 25, 2021 2:41 PM from Marlisa Grogan to everyone: @ Greer - we're continuing to work on an updated megawaiver that could possibly extend some of the waivers expected to expire 6/30.

June 25, 2021 2:41 PM from Greer Hannan to everyone: Thanks @Marlisa

June 25, 2021 2:41 PM from Sharon Price Singer to everyone: @Shonda, it depends on the type of unit--so, a unit that is part of the LIHTC program is income based, but a subsidy like a Voucher can be used with it. If it's a Project Based Section 8 unit, that is a susidy and another subsidy cannot be used with it.

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June 25, 2021 2:44 PM from Adelina Correia to everyone: Will there be an update on the FY21 CoC NOFA?

June 25, 2021 2:44 PM from Marlisa Grogan to everyone: @Lesa, fees that are required for all tenants (i.e., not just ESG-assisted clients) per their lease, such as a mailbox fee, can be paid for with ESG assistance

June 25, 2021 2:44 PM from Thomas Bates to everyone: Is there ever a situation where an LIHTC program would consider "Expected Family Contribution" from the FAFSA as income? A friend in Seattle reached out to me and had encountered a program denying someone bc this number (which is not income) put them over income. I cannot imagine why an LIHTC would want to see a number from FAFSA. I suggested they check into local housing advocates that could assist.

June 25, 2021 2:45 PM from Norm Suchar to everyone: @Adelina -- We are working on the CoC NOFO, but we have no updates on the timing. Thanks.

June 25, 2021 2:45 PM from Adelina Correia to everyone: @Norm Thank you!

June 25, 2021 2:48 PM from Shonda Gray to everyone: @Sharon, Thank you!

June 25, 2021 2:52 PM from Lesa Weikel to everyone: @Marlissa - Thank you!

June 25, 2021 2:53 PM from William HIGGINS to everyone: Hello all.. Here from Maine CoC Board and EHV program with lived experience. The Maine CoC is not a legal entity to sign the MOUs with PHA's. Our Collaborative Applicant is maine Housing which received 99 of about 180 EHV's. Who gets to sign the MOUs? It would be interesting for Maine Housing to sign as a PHA and the collaborative applicant (close as we have as a legal entity for CoC)

June 25, 2021 2:54 PM from Caroline Crouse to everyone: @William Higgins- please have the CoC email ehv@hud.gov

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June 25, 2021 2:55 PM from William HIGGINS to everyone: I will do that.

June 25, 2021 2:55 PM from Aidan Rich to everyone: Good Afternoon from Kansas City! I have a few questions regarding ESG-CV funding: (1) Medicinal marijuana is legal in Missouri, but not Federally. Would a temporary shelter be able to allow clients with a medical card to use the substance in their individual units and still be funded by ESG-CV? (2) We have an agency who owere serving clients with CDBG funding and then switched to ESG-CV funding without leaving their program. What date should they be exiting CDBG and entering ESG-CV in HMIS? Should it be the date they began filling out ESG-CV entry paperwork, when the agency switched the funding source from CDBG to ESG-CV for the program as a whole, or something else? (3) What is the threshold for an agency to count as a DV-agency and be exempt from using HMIS versus a comparable database? We found an FAQ from HUD saying that the main purpose of the agency must be assisting DV clients. Does that mean it needs to be in their mission statement, over 50% of their clients must be DV, etc.

June 25, 2021 2:55 PM from Aidan Rich to everyone: Sorry I know that is a lot

June 25, 2021 3:00 PM from Amy Stewart to everyone: Is the chat function working? It's been blank for me for a while.

June 25, 2021 3:01 PM from Caroline Crouse to everyone: @Amy- I think it's working- I saw your message.

June 25, 2021 3:02 PM from Jennifer Prins to everyone: @Thomas LIHTC rules are set by the IRS, so advocacy on income limits or calculations would likely have to directed to the IRS. Since that's tough, it might be better to talk with your local allocating agency (likely your state housing agency) about advocacting together.

June 25, 2021 3:05 PM from Thomas Bates to everyone: I will share that info as well, thanks!

June 25, 2021 3:06 PM from William Snow to everyone: @Aidan - RE: your second question, it depends on how your project is operating. This question likely needs to go through the

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AAQ. But we need to understand a few more details. What kind of project is this? Are the services from the different funding sources happening at the same time or all services provided by one source and then the source completely ends and it switches to another? I recommend reviewing this resource if you are talking about a homelessness prevention or rapid rehousing project:

<https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-HMIS-Project-Setup-for-ESG-CV-Funded-RRH-and-HP.pdf>.

June 25, 2021 3:07 PM from Marlisa Grogan to everyone: @Aiden - for your third question - A Victim Service Provider (VSP) is defined as "a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Such term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs. If this is not the agency's primary mission, they are not a VSP.

June 25, 2021 3:08 PM from Aidan Rich to everyone: @William it's an emergency shelter program paying for Hotel vouchers.

June 25, 2021 3:10 PM from William Snow to everyone: @Aidan RE: your third question on DV threshold. This all turns on how we define a victim service provider. In our recently released HMIS Comparable Database Manual we state the following: VSPs are prohibited from entering into HMIS. This includes those agencies who meet the definition above and those who receive funds through HHS Family Violence Prevention and Services Act (FVPSA), DOJ Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking. I would recommend looking at the first few pages of that manual to review tools around determining if you need to use a comparable database or not: <https://files.hudexchange.info/resources/documents/HMIS-Comparable-Database-Manual.pdf>.

June 25, 2021 3:11 PM from Brian Roccapriore (he/him) to everyone: @Aiden: The comparable database decision tree might be able to help you in your decision: <https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf>

June 25, 2021 3:12 PM from William Snow to everyone: @Aidan - please send that question in your ES program to the AAQ. But add details about how the funding sources interact. I want

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to verify with a few others on this before giving an answer (just want to make sure we give you the right answer on that).

June 25, 2021 3:14 PM from Aidan Rich to everyone: @Marlisa @William @Brian Thank you all for your answers. I will make sure to follow-up with an AAQ for the ES question.

June 25, 2021 3:16 PM from Marlisa Grogan to everyone: @Aiden - for your first question: HUD is aware that many states are passing Marijuana laws; however, the federal government has not approved it as a legal substance, even when prescribed medically. That being said, the CoC Program interim rule does not prohibit recipients or subrecipients from serving individuals or families based on active substance use. HUD requires only that all program participants meet the minimum eligibility criteria set forth in the ESG or CoC Program regulations and the Fiscal Year (FY) NOFA under which the project was funded (for CoC) and that recipients comply with all local and federal requirements.

HUD strongly encourages recipients to implement a Housing First approach, which means avoiding the implementation of policies that place a stringent burden on persons accessing housing and maintaining their placement in the program...

June 25, 2021 3:16 PM from William HIGGINS to everyone: I thank all HUD staff for the opportunity to participate and learn as a member of the maine coC Board here. My personal training is as a naval submarine officer and nuclear engineer, after graduating from the naval Academy in 1981. I was still a homeless veteran four times between 2002 and 2009. I have been housed with a partial and now a full VA disability since 2010.

June 25, 2021 3:18 PM from Marlisa Grogan to everyone: @Aiden - (cont'd) The CoC Program has released no guidance, but HUD has directed PHAs to develop policies internally about their position on dealing with current residents who use medical Marijuana. That guidance may be found at: <https://www.hud.gov/sites/documents/MED-MARIJUANA.PDF>. It clearly states that medical Marijuana is not legal for the purpose of admission for Section 8/HCV or public housing, and a Reasonable Accommodation may not be provided. This guidance did not address a position on medical Marijuana for other HUD programs, including the CoC Program, however recipients should be advised that a policy could be released at any time.

Federal law prohibits the use of illegal substances on Federal property, and persons who are known to be in the business of cultivating, selling, or distributing illegal substances, and those who knowingly

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facilitate such activities, are in violation of Federal law, and are subject to Federal enforcement action, including potential prosecution

June 25, 2021 3:18 PM from Kayla Thompson to everyone: To fill out the poll, please follow this link: <https://www.menti.com/ex8xnpufs3>

June 25, 2021 3:19 PM from William HIGGINS to everyone:  
<https://www.linkedin.com/in/williamhigginsjr/>

June 25, 2021 3:22 PM from Bethany Hamilton to everyone: Is there a way to share this poll more broadly?

June 25, 2021 3:22 PM from Shonda Gray to everyone: Can ESG-CV admin funds be used for marketing expenses for the program?

June 25, 2021 3:23 PM from Jessica Pauley to everyone: An HMIS question - if we have a client who disappears after being served in an project (RRH for example), what is the appropriate option to chose? We have been choosing data not collected or no exit interview completed, but both of these show as a destination error.

June 25, 2021 3:26 PM from Marlisa Grogan to everyone: @Shonda - marketing and advertising costs used to outreach to potential program participants could be eligible costs under the ESG program. ESG and all Federally funded programs follow the guidelines in 2 CFR 200, which outline cost principles and administrative requirements generally for federal programs. Part 200.421 allows for advertising costs if the costs incurred are for program outreach and other specific purposes necessary to meet the requirements of the Federal award. Permissible advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.

June 25, 2021 3:27 PM from Marlisa Grogan to everyone: Child Tax Credit Info:  
<https://www.irs.gov/credits-deductions/advance-child-tax-credit-payments-in-2021>

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June 25, 2021 3:27 PM from Sharon Price Singer to everyone: Treasury ERA Dashboard  
<https://nlihc.org/era-dashboard>

June 25, 2021 3:27 PM from Shonda Gray to everyone: @Marlisa, Thank you!

June 25, 2021 3:28 PM from Suzie Tolmie to everyone: Will someone please tell me if HUD REQUIRES HOPWA grantees to enter client-level data into HMIS, or merely ENCOURAGES? It is so hard to find guidance on this. What are the nuances?

June 25, 2021 3:28 PM from Jennifer Prins to everyone: Can you talk about what further guidance or support might be on the way in relation to the Secretary's recent letter? Will that be a topic on an upcoming call?

June 25, 2021 3:29 PM from Maria Davis to everyone: Thanks to all the presenters and snappers for another great Q&A session!

June 25, 2021 3:30 PM from Marlisa Grogan to everyone: @Jennifer - yes! More to come re: Secretary Fudge's letter on assisting those with a criminal history.